

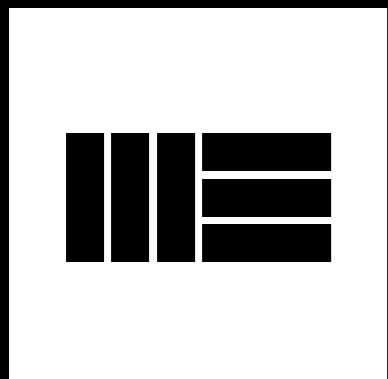
VASTERN COURT, CAVERSHAM ROAD PROOF OF EVIDENCE ON BEHALF OF THE APPELLANT IN RELATION TO HERITAGE MATTERS

DR CHRIS MIELE IHBC MRTPI

PLANNING INSPECTORATE REFERENCE: APP/E0345/W/21/3289748

READING BOROUGH COUNCIL PLANNING REFERENCE: 200328/OUT

MARCH 2022



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1.0

SUMMARY

VASTERN COURT, CAVERSHAM ROAD

SUMMARY

(ALSO BOUND SEPARATELY)

- 1.1 This proof of evidence ('PoE') is prepared on behalf of the Appellant and in relation to heritage matters.
- 1.2 It therefore addresses deemed Reason for Refusal ('RfR') 5 which is elaborated in the Council's SoC at paragraphs 1.5 and 6.58–6.68.
- 1.3 Section 2 of my PoE sets out my background and experience of some thirty years. **Appendix 1.0** contains my Curriculum Vitae and list of academic and professional publications.
- 1.4 I am a chartered town planner and member of the Institute of Historic Building Conservation ('IHBC'). I hold advanced academic qualifications in the history of architecture and urban planning, and maintain credentials in that area through publication and lecturing.
- 1.5 I have developed my expertise as a design and heritage assessor through experience over the last 20 years. This has included advising on many proposals of this nature and as a consequence of my work on the London View Management Framework, which is guidance to the London Plan and treats the management of strategic views in the context of major and tall developments.
- 1.6 I act regularly as an expert at planning appeals, call-ins and recovered applications, as well as in other jurisdictions.
- 1.7 I was not involved in promoting the scheme at Application stage in February 2020, but was invited to consider it last year, in June 2021. I visited the site and reviewed the Design and Access Statement ('DAS') and drawings and advised the Appellant and the Applicant that I could support the proposals. Montagu Evans prepared the Environmental Statement ('ES') chapter in support of the resubmission in October 2021.

- 1.8 As part of this instruction I also worked with the architects on the Design Code (CD1.47) which forms part of the revised application (now Appeal) submission. This was to explore the scope for the mitigation of potentially harmful effects on the significance of the assessed assets at reserved matters stage.
- 1.9 I have since visited the site again in the preparation of this evidence.
- 1.10 My main evidence treats those planning policies on heritage along with the 2021 National Planning Policy Framework ('NPPF'). I also look at the development context for the Appeal proposals and the land. The Appeal site falls within a local plan designation supporting tall buildings as part of planned, transformative change in this part of Reading. Whilst that planned change does not make a harmful impact on a designated asset acceptable, those policies (particularly CR10 and CR11 of the Reading Borough Local Plan, 2019) do demonstrate the direction of change in the townscape. The setting of many heritage assets in parts of the City Centre will change as a consequence of the development plan, and that factor needs to be taken into account, along with the history of recent consents and the general increase in scale across this part of Reading which is obvious.
- 1.11 As part of my assessment I consider the design of the scheme in order to contextualise my findings and because the site is in the wider setting of the heritage assets I consider.
- 1.12 There is, however, separate evidence on design prepared by the scheme architect, Mr Collado, and on townscape and visual impact, Mr Chard. My proof takes their findings as read and does not seek to replace or supplement their analysis.
- 1.13 In summary I find, in line with the Environmental Statement we revised, and as follows:
- 1.14 I identify a low order of less than substantial harm ('LTH') to the Grade II listed former Main Building of Reading General Station on an assessment of the proposals submitted for approval. I have considered whether and to what extent this low level of harm could be reduced or removed at reserved matters stage and with reference to the Design Code and indicative design work which Mr Collado's firm presented.
- 1.15 Otherwise, and in relation to the other two designated assets which are the focus of my evidence, my conclusions are in line with the ES' findings, that is a very low level of LTH to the significance of the Council Chamber and the Market Place / London Street Conservation Area. I explain why in the substantive analysis in this proof.
- 1.16 The ES identified a low level of LTH to the nearby non-designated heritage asset, 55 Vastern Road. The Council do not take a point on this impact in its Statement of Case ('SoC'), and since there is no statutory duty pertaining to setting impacts on this class of asset (see my comments in **Section 3.0**), I say no more about it.
- 1.17 The Council's SoC has made various allegations against the historic environment chapter of the ES.
- 1.18 Essentially, the Council allege the Heritage Impact Assessment's ('HIA') area of analysis (500 metres from edge of site) is said not to have been informed by a zone of theoretical visibility ('ZTV') study. This, it is alleged, would have thrown up other impacts.
- 1.19 The Council have not made any formal request for additional environmental information on the basis the assessment did not identify a likely significant indirect (that is, setting) effect.
- 1.20 The Council's Committee Report (CD3.1, paragraph 8.139) alleges multiple visual impacts from the Market Place/London Street Conservation Area, a large linear CA that follows the alignment of what was historically a main route from the south. However, apart from the impact I discuss from paragraph 1.21 below, the Council do not identify any specific impacts. London Street is a meandering street which is well enclosed in places and bisected by a busy road. I have to reserve the Appellant's position on rebuttal evidence to deal with any additional impacts.
- 1.21 The Council also now say (see SoC, RfR 5, page 6) that the proposals have a harmful setting impact on the Grade II* listed Town Council Chamber and Offices with Clock Tower (the 'town hall') in one of the views identified in an SPD supporting the local plan, from Duke Street looking north.
- 1.22 I have accordingly undertaken an assessment of this asset on the basis of the Council's non-verified imagery (no request for a surveyed AVR was made before exchange or since).

1.23 I do not think the view in question conveys an appreciation of the special interest of that important structure because of the distance, the incidental nature of the view and the partial vision one has of the building (its upper parts). I note that the adopted CA Appraisal (CD 7.43) identifies a good long distance view of the Tower of Laurence's from the north end of Duke Street, noting that there is a view of the town hall clock coming into view along with other heritage assets. The view modelled roughly in the Council's SoC is from further back, and does not enable this group appreciation. For reasons set out in my evidence, I do not identify a materially harmful effect on the ability to appreciate what is special about the Town Hall from the experience in this view. I note that Mr Bridgland for the Council concludes this impact comprises a very low order of less than substantial harm, which is not very much harm given the potential sensitivity of the asset in question (due to its high grade).



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Date: 29 March 2022

2.0

WITNESS BACKGROUND AND EXPERIENCE

VASTERN COURT, CAVERSHAM ROAD

WITNESS BACKGROUND AND EXPERIENCE

2.1 My name is Chris Miele and I am a Senior Partner at Montagu Evans' Central London office. I am a Chartered Town Planner (MRTPI) and a Member of the Institute of Historic Building Conservation (IHBC).

OUR PRACTICE

2.2 Montagu Evans is a leading firm of chartered surveyors, established in 1921. My partners and I employ more than 350 staff. Most are based in our new office at 70 St Mary Axe.

2.3 We provide all areas of development surveying consultancy, from rating and valuation to management and investment advice. The town planning consultancy has always been central to our business, and it is provided through our Planning and Development Department.

PROFESSIONAL BACKGROUND

2.4 An overview of my background and experience is provided within my Curriculum Vitae at **Appendix 1.0**, which also includes a list of my publications.

2.5 As a partner in the Planning and Development Department I provide specialist advice on sites that involve development on and adjoining sensitive land, and my particular work over many years has focussed on the historic environment.

2.6 I also provide townscape and visual impact advice and expert witness services but in this case, that evidence is being given by Mr Chard of Barton Willmore for the Appellant.

2.7 My public and charitable clients have included the Royal Shakespeare Company, the Trustees of the British Museum, of the South Bank Centre, and many universities (Oxford, Durham, Leicester, Sheffield, Sussex, UCL

and Kings). I have also advised the MHLGC on the National Holocaust Memorial and Learning Centre, in Victoria Tower Gardens near the Palace of Westminster (a WHS – I gave evidence to the recovered appeal inquiry) and the Rothschild Foundation on its Illuminated River Project. The latter involved the re-lamping of 15 bridges in central London to an artistic design by the internationally renowned lighting artist Leo Villareale. This entailed all planning advisory services, and the project is now being implemented.

2.8 Other current projects involving public or charitable clients include advice on the proposals for the conservation of Hammersmith Bridge and a new place of worship for 25,000 people in open countryside in central Beds (and featuring the largest clear span earth dome in Europe – resolution to grant received in April 2021).

2.9 My main body of client instructions come from private companies, and I work for the leading ones in this country. These include: Delancey, Orion, Hammerson plc, Chelsfield Advisers LLP, CIT, London and Regional, Qatari Diar, Land Securities, Henderson's, Threadneedle and many of the major house builders including Fairview, Barratt, Berkeley, St William (a JV with National Grid), and Taylor Wimpey.

2.10 I have over the years come to specialise in expert witness work, appearing mostly for commercial developments at Section 77 and 78 Appeals. I am approached regularly to act for local authorities but in all cases in the last years I was unable to act either because of conflict of interest (the Appellant was a client of the firm and identified a conflict) or because I could not support the proposals.

TALL BUILDING EXPERIENCE

2.11 I have a great deal of experience of advising on tall buildings' proposals in the settings of heritage assets, including ones of the highest value (World Heritage Sites). A selection of the tall buildings I have advised on is provided at **Appendix 2.0**.

2.12 I draw attention below to schemes that I have advised on which are of particular relevance to this inquiry and/or which demonstrate my authority to provide expert witness.

2.13 First, I have advised on several sites in Reading over the last few years. A notable example is the tall building proposed for Allies London, Royal Heights, to the east of the City Centre. It was consented in 2018.

2.14 First, I cite a sample of relevant schemes that demonstrate my understanding of this form of development:

- 39 Deansgate, Manchester City Council (ref:131314/FO/2021): Heritage, townscape and visual impact consultancy in relation to the consent for a redevelopment of the site to provide a 17 storey building comprising office use , flexible ground floor commercial units and sui generis 'drinking establishment', following the demolition of the existing building. The application received a resolution to grant planning permission in January 2022.

2.15 • Goldsworth Road, Woking, Wokingham Borough Council (ref: APP/A3655/W/21/3276474): Townscape and visual impact consultancy in relation to the consent for 929 residential units, commercial uses at ground floor and a homeless shelter within 5 buildings of varying heights ranging between 9 and 37 storeys.

- Langley, Brighton and Hove (ref: BH2018/0259): heritage, townscape and visual impact consultancy in relation to the consent for 208 homes alongside commercial floorspace. The building will be the fourth tallest in the city and the first Build to Rent scheme to secure approval in Brighton.

Second, I cite call-in inquiry schemes that demonstrate my authority on matters of national significance:

- Land at Citroen Site, Brentford, London Borough of Hounslow (ref: APP/G6100/V/19/3226914): acting for the appellant on the allowed appeal for 441 residential units (Class C3) including 50% affordable housing with ancillary facilities in buildings of 12, 13, 16, 17 and 18 storeys in height, with particular focus of the impact upon the Royal Botanic Gardens Kew World Heritage Site.
- National Holocaust Memorial and Learning Centre, Victoria Tower Gardens, City of Westminster (ref: APP/X5990/V/19/3240661): advising Ministry of Housing, Communities and Local Government on the upheld appeal for the installation of the Memorial and Learning Centre, with particular focus on the impact of the proposed development on the adjoining Palace of Westminster and Westminster Abbey including Saint Margaret's Church World Heritage Site.

PAST EMPLOYMENT

- 2.16 Before joining Montagu Evans, I was a professional officer of English Heritage (now Historic England, "HE", 1991-98) advising in connection with its statutory duties. I was then a Director at Alan Baxter and Associates (1998-2003) and Senior Planning Director at RPS (2004-05).
- 2.17 I joined Montagu Evans as Partner in 2005 and became a senior and owning partner in 2011.

ACADEMIC QUALIFICATIONS AND CREDENTIALS/PUBLICATIONS

- 2.18 Before settling in the United Kingdom, and whilst completing my masters and doctoral work, I held several academic and museum appointments at Columbia University, New York University and the Metropolitan Museum of Art and Museum of Modern Art, all in New York.
- 2.19 I continue to work as an independent scholar and have published widely in my specialist area, C19 and C20 architecture and planning, and in recognition of this independent historical work, I have been elected a Fellow of the Royal Historical Society and of the Society of Antiquaries. I have two pieces this year appearing in major collections of essays on William Morris (one from Routledge and the other from the V&A/Thames and Hudson).
- 2.20 I am an Honorary Professor in the Social Sciences Faculty at Glasgow University, and outgoing Chair of the Board of the Centre for Urban History at Leicester University.

3.0

SCOPE OF EVIDENCE

VASTERN COURT, CAVERSHAM ROAD

SCOPE OF EVIDENCE

- 3.1 I set out an overview of the characteristics of the site in terms of heritage designations followed by the Council's assessment of the same in the Committee Report (CD3.1) and Reason for Refusal ('RfR') 5.
- 3.2 The Appeal site does not contain any designated heritage assets, nor is it located in a Conservation Area. It lies within the setting of a number of listed buildings and non-listed buildings which are identified in the Baseline Study: Built Heritage Statement (CD1.39–CD1.41) which was submitted with the Appeal scheme.
- 3.3 Three of these heritage assets are identified in the deemed RfR5 and which form the basis of my analysis.
- 3.4 The proposals will lead to a change in the setting of the identified heritage assets and to varying degrees according to their location and proximity to the Appeal site.
- 3.5 As will be clear in my evidence, I am of the view that the proposals will not give rise to any unacceptable heritage effects.
- 3.6 The impact of highest magnitude is on the setting and significance of the Grade II listed Reading Station which led me to identify a minor / moderate adverse effect as part of the ES assessment (CD1.43). A minor-moderate impact is only just significant in ES terms and I would consider such harm to represent a very low degree of less than substantial harm in the language of the framework. The site comprises the setting of the station and any enhancements to the townscape quality of the area would have a beneficial effect on that setting. I leave it to others to set such benefits in the balance.
- 3.7 My instruction entailed advising the scheme architects on the submitted Design Code (CD1.47) and the indicative scheme that stands behind that (and which is submitted for approval). The purpose of that was to identify ways (materials, massing, appearance) which could mitigate the harmful impact I identified on the basis of parameters. In fact, I conclude that a scheme of the kind indicated would remove the potential for harm to the setting of the station.

- 3.8 In the ES assessment, I identify that the setting and significance of the locally listed 55 Vastern Road is affected to a minor extent. Given the building is not statutorily listed, such harm is not weighted harm in the terms of statute of paragraph 199 of the framework, and I note the Council do not appear to take any point in relation to the setting change to this building.
- 3.9 I note at this point that the building is under review for statutory listing. Whilst this does not alter the status of the building currently, I reserve the right to prepare additional evidence on this asset if it were to be added to the statutory list after exchange.
- 3.10 All other effects on significance are negligible, that is, not material as to materially affect significance but that still register very low down on the LTSH scale.
- 3.11 To be clear, I do not identify any level harm that would, in my view, give rise to an unacceptable effect on significance. It should be noted that where adverse effects have been identified, these are on the basis that the change in scale and the juxtaposition between the existing and proposed scales is considered to be harmful in the absence of detailed design proposals and a fully resolved architectural approach. The level of harm has been identified as a cautious assessment of the effects of the maximum parameters and without taking into account the full implications of the development plan designations.
- 3.12 My earlier comments on the potential for the indicative scheme and Design Code to remove all harm apply to these other assets equally.
- 3.13 The Council has reached a different view on the impact to some heritage assets and I summarise this here as it forms the scope for my evidence set out in this proof.
- 3.14 I treat deemed RfR 5 which states:
- (5) *By virtue of the proposed maximum height and siting of Blocks C and D the proposal would result in a detrimental effect on the setting of and therefore, the significance of the Grade II listed Main building of Reading General Station, the Market Place/London Street Conservation Area and the Grade II* Town Council Chamber. The public benefits of the proposals are not considered to outweigh the less than substantial harm caused to the significance of these designated heritage assets. Therefore, the development is contrary to Reading Borough Local Plan (2019) Policies EN1,*
- 3.15 *EN3, EN5, EN6, The Reading Tall Building Strategy, The Reading Tall Buildings Strategy Update Note 2018, and the Reading Station Area Framework (2010) and Section 16 of the NPPF.*
- 3.16 The Committee Report (CD3.1) and Mr Bridgland's SoC (Appendix K of the Council's SoC) criticise the study area and approach to assessing significance which informed the HIA/ES chapter on the historic environment. I return to these in my in **Section 7.0**.
- 3.17 The Committee Report explains the following heritage assets are most likely to be affected by the proposals:
- Former Town Council Chamber (Grade II*);
 - Main building of Reading General Station (Grade II listed); and
 - Market Place/London Street Conservation Area
- 3.18 The Committee report goes on to consider the impacts on these assets in detail. I will consider the Council's analysis in the relevant parts of my proof and respond to that analysis.
- 3.19 I note that the commentary and assessment in the Council's Committee Report and SoC, although they make reference to the locally listed 55 Vastern Road, do not attribute harm to the building's setting or significance. I therefore address it no further in this evidence notwithstanding my comment at 3.9.

COUNCIL'S STATEMENT OF CASE

Finally, and to assist the Inspector I have highlighted what I see as the substantive points made in the SoC:

- The scheme will be visible from Market Place/London Street Conservation Area – I note here that visibility does not equate to harm because a setting change can have a positive, negative or a neutral effect on significance or the ability to appreciate it.
- The Appellant has not examined Reading Station Area Framework ('RSAF', CD7.1) View 56 Duke Street and Market Place because it falls outside the study area which the Council say should have been larger.
- That the setting of the Conservation Area is harmed by the intrusion of bulky, tall buildings in views along Duke Street – making this criticism, the Council clearly have in mind the submitted parameters, which is the correct approach, however, the indicative design work and Design Code are material considerations of weight and so should figure in any consideration of the proposals.

- The Council identifies a low degree of less than substantial harm to the Conservation Area, albeit they do not expand on which parts or aspects of significance are affected. I assume this criticism rests on the perceived harmful impact on the setting and significance of the Grade II* listed town hall as seen from a particular vantage point to the south.
 - That there is no evidence provided to indicate that attempts to reduce harm have been made. I think this criticism overlooks the fact that the proposals have been formulated on the basis of environmental testing and that the proposals are presented in outline. The reserved matters stage provides an opportunity for harm reduction.
- 3.20 In summary therefore my evidence deals with the impact of the Appeal scheme on:
1. The Market Place/London Street Conservation Area in general terms and reserving my position on rebuttal evidence in respect of this asset and which aspects of significance are affected.
 2. The Grade II* Former Town Council Chamber.
 3. The Grade II listed Main building of Reading General Station.

4.0

INVOLVEMENT IN THE PROPOSALS

VASTERN COURT, CAVERSHAM ROAD

INVOLVEMENT IN THE PROPOSALS

- 4.1 I was not involved in promoting the proposals in support of the first application made in February 2020. Following the receipt of feedback from RBC on the contents of the February 2020 submission I was contacted by Aviva to support the resubmission of the ES in October 2021 and to review the scheme and its acceptability in relation to the impacts on heritage assets.
- 4.2 As part of this, I worked closely with the architects on the Design Code (CD1.47) before the Inquiry and with Mr Chard on the relevant images. I also oversaw and contributed to the revised ES chapter on heritage (CD1.43) and with reference to the response from RBC's Historic Buildings Consultant of June 2020 (CD2.9).
- 4.3 The Council's adviser identified harm to the Grade II listed Reading Station building, that the proposals would affect views from the Grade II listed Great Western House and that similar, though lesser impacts would be anticipated on Nos. 13 and 15 Station Road (Grade II); and the statue of King Edward VII' (Grade II).
- 4.4 The Council's adviser considered also that the proposed development would harm the setting of the Market Place/London Street Conservation Area (CA).
- 4.5 The level of harm to these heritage assets was not specified in NPPF terms in the adviser's response.
- 4.6 I note that the Council's adviser did not consider the Grade II* Council Chamber/Town Hall (Town Hall hereafter) to be affected by the proposals in their consultation response) and as such did not make comments on or assess the asset in any detail, and did not request any testing to be done.
- 4.7 Harm is now alleged to this Grade II* listed structure. (See paragraph 6.60 SoC from Council and paragraph 5.14 of Mr Bridgland's SoC), I note there was no formal request for further information under the terms of the ES regulations.
- 4.8 I have also had due regard to Historic England's ('HE') consultation response to the original application, received in April 2020 (CD2.29). HE highlighted that a view had not been provided looking north from Station Road towards the site which would enable an experience of the proposals beyond the listed station building. It is my understanding that upon HE's request, this view was provided and HE were re-consulted as part of the revised application but no further comments were forthcoming. I address this view in particular in Section 10 of my PoE.
- 4.9 In discharging this instruction, I have adhered to the RTPI Code of Conduct and prepared evidence consistent with the terms of the guidance to Part 35 of the Civil Procedure Rules and which governs the work of expert witnesses. The required affirmation concluding this evidence sets out my understanding of those duties. This includes confirmation that I am not paid under any contingency or success-fee arrangement.

5.0

POLICY CONTEXT

VASTERN COURT, CAVERSHAM ROAD

POLICY CONTEXT

5.1 In this Section I deal with the statutory provision relating to the settings of listed buildings and conservation areas, national policy and the development plan with its supporting documents. I leave the weight of different documents to others. Since this is a heritage case, I focus on statutory provision and the Framework's policies, mindful, also, that the development plan calls for transformational change which will inevitably affect the settings of heritage assets.

LEGISLATION

THE PLANNING (LBCA) ACT 1990 AND FRAMEWORK

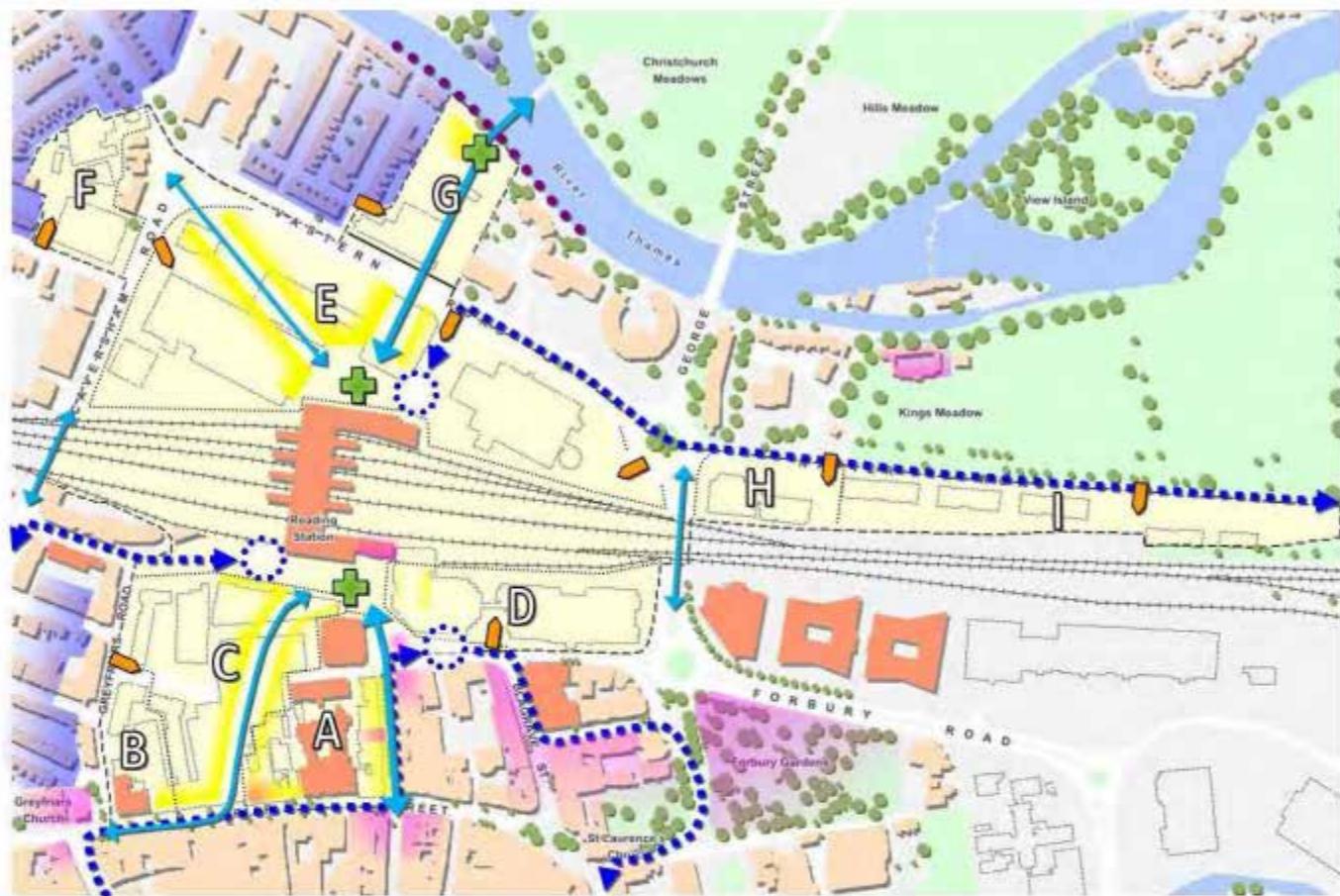
5.2 First is the familiar statutory provision relevant as set out at 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("PLBCAA"). This requires the decision maker to pay special regard to the desirability of preserving, amongst other things, listed building and its setting. The courts have clarified that any harm attracts particular weight in the planning balance, engaging a presumption against the grant of consent. That presumption is rebuttable on the balance of benefits. See the cognate policies in NPPF 199 – 204. The well-known decision in Barnwell Manor concludes that less than substantial harm does not amount to a less than substantial objection, effectively confirming what I have always understood to the case: decision makers are entitled to refuse applications or dismiss appeals even on the basis of LTSR.

DEVELOPMENT PLAN

5.3 The Reading Borough Local Plan (2019) (CD4.1) comprises the development plan.

5.4 The Reading Station Area Framework (2010) ('RSAF') (CD7.1) is an important document as part of the suite of supplementary planning documents intended to guide the regeneration and development of this part of Reading City Centre.

- 5.5 The table below identifies the development plan policies and Supplementary Planning Documents (SPDs) which are relevant to the proof of evidence. There is a detailed discussion of the principal policy designations relating to the site in the evidence of Ms Jasper for the Appellant.
- 5.6 The policy designations pertaining to the site and the surrounding area indicate that this location has been identified as suitable for new development which is of a greater density and height than the existing prevailing townscape.
- 5.7 Through the Reading Central Area policies CR1 to CR10 and the Reading Station / River Major Opportunity Area policy CR11, RBC have confirmed that they want locations near to the station to be marked with taller buildings and in a planned way that ensures density is secured through design-led optimisation.
- 5.8 The approach to densification in this area is enshrined specifically for the site in Policy CR10 (Tall Buildings). The site is located in the area identified at part i) of the policy under area CR10a, 'Station Area Cluster.' The part of the policy that relates to this part of the Reading Central Area states that: '*A new cluster of tall buildings with the station at its heart will signify the status of the station area as a major mixed-use destination and the main gateway to and most accessible part of Reading.*'
- 5.9 The policy wording indicates that RBC recognises that tall buildings are an appropriate approach to delivering sustainable development in this area which is characterised by high levels of accessibility and limited environmental constraints including highly graded heritage assets or landscape designations. It is notable that the boundary of the Major Opportunity Area and that area identified as the Tall buildings cluster policy CR10 extends to the south and meets the historic core of the city. The boundary identified in this way shows the Council has considered and expects change in these locations adjacent to the heritage assets.
- 5.10 Currently the area around the station and on this site is not marked by buildings of height, although there are a number of recent consents in the area which signal the significant changes to the townscape context alongside which the proposals need to be considered.
- 5.11 Given the adopted policies for this central area are all focussed on creating a new destination, the impacts of development proposals on this site should be looked at in context of policy of development area.



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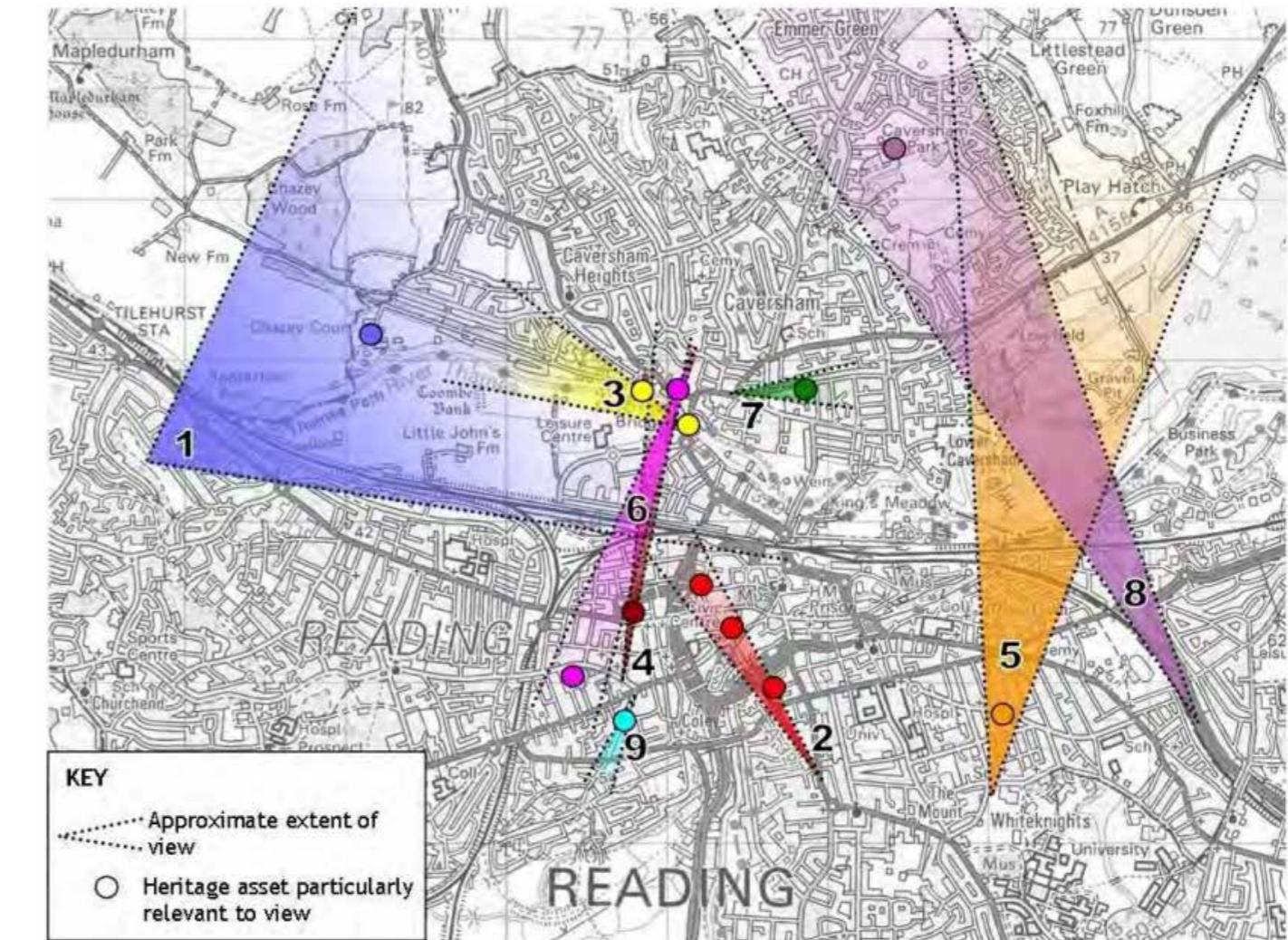


Figure 5.2 Extract from RBC Local Plan of key views and protection of heritage assets from policy EN5, Figure 4.2.

Figure 5.1 Extract from the RBC Local Plan showing the Station/River Major Opportunity Area Strategy, Figure 5.3.

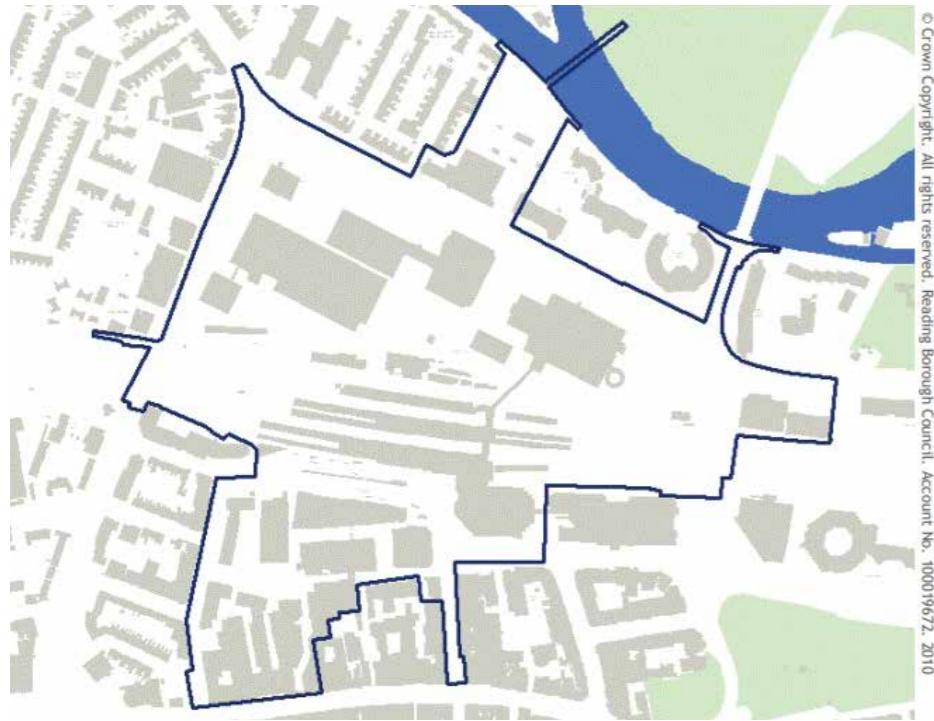


Figure 5.3 'Station Area' boundary, as identified in the RSAF, Figure 2.1.

DEVELOPMENT PLAN POLICY	KEY PROVISIONS
The Reading Borough Local Plan (2019)	EN1: Protection and Enhancement of the Historic Environment EN3: Enhancement of conservation areas EN5: Protection of significant views with heritage interest EN6: New development in a historic context CR2: Design in central reading CR10 Tall Buildings CR11 The Reading Station / River Major Opportunity Area policy
Supplementary Planning Documents	
Reading Station Area Framework (2010)	
Reading Tall Building Strategy (updated 2018)	

Table 5.1 Development Plan Policy

NATIONAL POLICY

NATIONAL POLICY	KEY PROVISIONS
National Planning Policy Framework (July 2021)	Chapter 12: Achieving well designed places Paragraph 126 Paragraph 130 Paragraph 131 Paragraph 132 Paragraph 133 Paragraph 134
National Planning Policy Framework (July 2021)	Chapter 16: Conserving and Enhancing the historic environment Paragraphs 189 – 208

LEGISLATION AND NATIONAL PLANNING POLICY DISCUSSION

The Inspector will be familiar with the policies on the historic environment in the Framework and supporting guidance in the PPG. Instead of reciting them, I think it is more helpful here to set out the broad approach that flows from these documents.

- The significance of the heritage assets affected should be identified and assessed (paragraph 194 NPPF). Heritage interest may be archaeological, architectural, artistic or historic (Glossary to the NPPF);
- The impact of the Proposed Development on the significance of the identified heritage assets is then to be considered (paragraph 199 NPPF);
- If the Proposed Development is held to cause harm to the significance of a designated heritage asset, such harm should be categorised as either less than substantial or substantial, and within each category the extent of harm should be clearly articulated (PPG paragraph 18). The nature and extent of harm is important to ascertain because that analysis informs the balancing out of any harm under the terms of 202;
- In either case, if a proposal would result in harm to the significance of a designated heritage asset, great weight should be given to the asset's conservation (paragraph 199 NPPF);
- Any harm to the significance of a designated heritage asset should require 'clear and convincing justification', as per paragraph 200 NPPF. A clear and convincing justification does not create a freestanding test requiring the demonstration of less damaging alternatives. To the extent that there is a test it is to be found in paragraphs 201 (in the case of substantial harm) or 202 NPPF (in the case of less than substantial harm). Post Bramshill¹, the question of harm vs heritage benefits can be dealt with either internally or as part of an overall 202 balance;

¹ City & Country Bramshill Ltd v Secretary of State for Housing, Communities and Local Government & Ors [2021] EWCA Civ 320 (09 March 2021).

	<ul style="list-style-type: none"> In either case, and particularly looking at less than substantial harm, the clear and convincing justification the Framework requires are countervailing public benefits, and these can include benefits to the way an area appears or functions or to heritage assets (through, for example, improvements to their townscape setting) or land use planning benefits; As a matter of policy, heritage benefits also attract great weight in the planning decision making (and assessment process). 		
5.13	I understand that if the decision made follows the above approach, then this approach is consistent with the extensive case law which has emerged in relation to designated assets since the publication of the Framework. I confirm I am aware with this body of case law, but I see no real benefit in me reciting it or summarising it. Any matters of interpretation in dispute as to the meaning of the statutory provision and policy would be subject to submissions or specific rebuttal evidence if deemed expedient.	5.16	On my reading of EN6 there is no reason why an outline application cannot be acceptable and in any case, there is a Design Code before the Inquiry which demonstrates how the scheme could be developed at Reserved Matters Stage in order to mitigate or remove any alleged harm caused by the Proposed Development. Furthermore, the Council validated the application presented in outline.
5.14	One area of debate is whether, in cases of harm, it is right as a matter of planning practice to take account of any countervailing benefits and to engage 202 only in cases of net harm (the so-called 'internal heritage balance' also known as the Palmer ² approach after a Court of Appeal decision). The alternative is to treat any harm at all as engaging the 202 balance, and then to introduce benefits to the affected asset (not engaging in the heritage balance but applying the Bramshill principle after another Court of Appeal decision). As I understand the decision just referenced, either approach is potentially open to the decision maker on the facts of a case. I leave it to others to say which applies in this case and on what basis. The difference in approach doesn't affect my qualitative judgement on impacts.	5.17	I note that the Council have criticised the assessment undertaken in the ES for not providing evidence of where attempts have been made to reduce potential harm arising from the proposals (Committee Report, CD3.1, paragraphs 8.143 and 8.145). I assume from this the Council are referring to the treatment of detailed design. However, I understand that an ES can only utilise the maximum parameters of the development. By contrast, it is fair for an expert in evidence to take the assessment one stage further and to look at how the parameters could be populated by detailed design and that is what I do with this written evidence.
5.15	Reading Borough Local Plan Policies EN1 and EN3 are general heritage policies that reflect the terms of the framework and statutory provision. I question the relevance of including EN3 in the RfR because, on my reading, this policy does not deal with the setting of CAs but rather with development in CAs. This is ultimately a moot point because the framework treats the setting of CAs.	5.18	Policy CR10 (Tall Buildings) is clearly an important policy because the site falls within CR10A, Station Area Cluster, defined as an area with potential for tall buildings. This is subject to specific provisions presented at limb ii): <i>"A new cluster of tall buildings with the station at its heart will signify the status of the station area as a major mixed-use destination and the main gateway to and most accessible part of Reading. Tall buildings in this area should:</i>
			<ul style="list-style-type: none"> <i>Follow a pattern of the tallest buildings at the centre of the cluster, close to the station, and step down in height from that point towards the lower buildings at the fringes;</i> <i>Contribute to the creation of a coherent, attractive and sustainable cluster of buildings with a high quality of public realm;</i> <i>Ensure that adequate space is provided between the buildings to avoid the creation of an overly dense townscape and to allow buildings to be viewed as individual forms;</i> <i>Be designed to fit within a wider planning framework or master plan for the area, which allows separate parcels of land to come forward at different times in a coordinated manner."</i>
		5.19	Limb v) of CR10a also contains a number of points which are relevant in the context of my evidence. I reproduce the pertinent provisions below for ease of reference: <i>"In addition to the area-specific requirements, all tall building proposals should be of excellent design and architectural quality, and should:</i>
			<ul style="list-style-type: none"> <i>Take account of the context within which they sit, including the existing urban grain, streetscape and built form and local architectural style.</i> <i>Avoid bulky, over-dominant massing.</i> <i>Conserve and, where possible, enhance the setting of conservation areas and listed buildings.</i> <i>Use high quality materials and finishes."</i>
		5.20	It appears to me this policy contemplates transformational change, as explained in supporting text (as set out at paragraph 5.3.35 of the Local Plan): <i>"The vision for Reading seeks to build on the status of central Reading as the dynamic and creative core of the capital of the Thames Valley. Tall buildings have an important part to play in achieving this. They have a symbolic role in marking the centre out as a regionally-significant hub of activity, and a practical role in accommodating the level of development that this status entails in a highly accessible location."</i>
		5.21	The point is made expressly a little later at supporting text 5.3.51, where reference is made to: 'Reading's emerging status as a regional capital of the Thames Valley' in the context of the architectural quality of proposed tall buildings. This policy also allows for outline applications to establish the principle of a tall building and accepts that the Design and Access Statement accompanying the application can be relevant: <i>"...the Council considers that outline planning applications for tall buildings are appropriate only in cases where the applicant is seeking to establish the principle of (a) tall building(s) as an important element within the context of a robust and credible master plan for the area to be developed over a long period of time. In such cases principles must be established within the design and access statement accompanying the application, which demonstrate that excellent urban design and architecture will result" (paragraph 5.3.51).</i>

² Palmer v Herefordshire Council & ANR [2016] EWCA Civ 1061 (4 November 2016).

5.22	I work a lot on tall buildings across London and the country, and based on my experience I would say this is an emphatic policy with ramifications for the way that Reading's heritage is appreciated. The Local Plan must contemplate, then, that the transformational change envisioned will potentially affect not just one but many heritage assets, up to the highest grade. This does not mean that there will be harmful impacts or, if there are, they will be acceptable but it does provide an important context for the decision maker.	5.29	This list of heritage sensitivities is clearly not comprehensive but if I read CR10 and CR11 together, then I conclude the policy framework underscores the reality of a changing context for all heritage assets in the city centre.	5.32	The Conservation Area ('CA') appraisal for the Market Place / London Street CA was adopted by the time the RSAF was drafted and finalised in 2010, and so also the Tall Buildings strategy in 2018. I conclude, therefore, that these documents are prepared with an understanding of the CA's proximity and its special interest. It says relatively little about setting, but does note areas of poor urban design (through road design, for example) and poor examples of modern architecture. It does not, on my reading, demonstrate any particular concern about the impact about tall buildings outside the CA boundary, but it would appear to predate both the Station Framework and the Tall Buildings Strategy. It is also pre-Framework.
5.23	Policy CR11 (Station/River Major Opportunity Area) is also relevant and for similar reasons to CR10 because it reinforces the station area as a major opportunity at a city-wide scale.	5.30	The following guidance documents are also material considerations. I either take them into account in presenting my evidence or I refer to them direction (for example:	5.33	The Tall Buildings Strategy (CD7.45) treats the historic environment at pages 16 and ff. It notes, amongst other things, that the historic core is a discrete part of the central area (which I take to be well defined, and I agree). The restrictive nature of these designations is noted. The implications of tall buildings on these matters is treated at page 19, where it is pointed out that locations in close proximity to the core could be considered. The drafting is, at this point, not entirely clear, but it appears to conclude that there is a) precedent for contrast in scale (the Abbey relative to the historic town) and b) there is a possibility for integration, helping to articulate the historic core. On my reading, this appears to suggest that contrast as between tall buildings and the historic environment is not necessarily harmful in this particular context, and if I am right about that, then I agree with it.
5.24	I think there is an interesting point here for the station, the asset which is at the core of the Council's concerns (on my reading of the papers).				
5.25	When the station opened in 1840 it served a very much smaller city, and one where the historic focus of development was to the south of it, and access was achieved by station road. The importance of Reading and the station have, as I understand the matter, grown quite considerably, such that the visual role of the old station as a marker, conveying arrival has changed. It stands as a reminder, and the existing change in scale around is a demonstration of how Reading has evolved. The station development presents an image of modernity and has a certain scale and presence, and the station building has become redundant, with a new use and so functions as an adjunct to the functional parts of the station.				
5.26	Foreshadowing later analysis, my opinion is that major new development associated with the station rebalances its legibility, reflecting the regional status and growth aspirations of the City.	5.31	To avoid duplication with other evidence, I do not discuss the Reading Station Area Framework. The listed station is in that boundary, and on the axis of planned new squares and an approach road enhancement which the document calls essential to the strategy to integrate this planned area with the existing shopping (see, pages 24 to 27). There is density guidance (which goes to building heights broadly) which shows the old station at the heart of a cluster of medium to high density development (page 35, see also sensitivity diagram page 38, which can be read alongside a local views diagram, page 42). The document was therefore prepared with reference to historic environment sensitivities, including older parts of the city centre which fall in the Market Place/London Street CA nearby.	5.34	There is a very good city-wide historical development summary, in Appendix 2: Cultural Heritage. This contains a clearer explication of the potential interaction, at page 14, which is helpful. Summarising this assessment, I conclude that it accepts that the historic environment is both varied (intermixed with modern development), lacking cohesion and context. I think this is a fair way to think of the historic resource. Clearly, there are good runs of old buildings of real merit and interest, but Reading's historic identity is not strongly expressed through the built remains of that history. It is, in short, an ancient settlement that has evolved considerably to the point where I do not think one would classify it as an 'historic town' (a term I use conventionally) even if it has some very valuable parts. These are experienced in the context of a modern thriving and growing city.
5.27	CR11e (North of Station) goes to this point to an extent. Within the supporting text to this policy, I note the following paragraph, 5.4.4 which identifies the station area as a " <i>destination in its own right</i> ". The text goes on to say that retail and leisure development will help " <i>draw the station into the core of the centre</i> " contributing to the activation of the surrounding townscape.				
5.28	Paragraph 5.4.8 recognises specific heritage assets within or close to the station area, including the listed station building itself and also making reference to the Market Place/London Street Conservation Area.				

5.35 In the study's Appendix 1: Townscape and Visual Assessment, a much more detailed analysis of viewpoints and key views within the central area is set out. Page 37 of this identifies a view near to the one highlighted by Mr Bridgland for the Council but closer to and focused on the church, and whilst the Town Hall tower is visible, the accompanying text (which is brief, I acknowledge) does not mention it.

COMMENTS ON THE SOC

5.36 Paragraph 6.65 in the Statement of Case states that:

'As set out in the committee report at 18.32, the cause of harm to the Main Building of Reading General Station, the Market Square/London Street Conservation Area and the Town Council Chamber derives from the scale and massing of the proposals and how this affects the appreciation of designated heritage assets. The appeal site is identified in both the Reading Station Area Framework and the Reading Tall Buildings Strategy as a suitable location for tall buildings. Notwithstanding this, the RSAF requires that proposals have no adverse impact on historic assets and their settings (policy CS33). Similarly, the Reading Tall Buildings Strategy requires that "All tall buildings proposals should... avoid detrimental impacts upon conservation area and listed buildings" (S 6.3 General Principles).'

5.37 Paragraph 6.66 goes on to state:

5.38 *"In the case of the Main Building of Reading General Station, the Market Place/High Street Conservation Area and the Town Council Chamber the proposals will create a degree of less than substantial harm (moderate, low and very low respectively) to their significance. As set out in the applicant's own Heritage Statement, Historic England recommends that where harm is identified, consideration should be given to options that might reduce or mitigate that harm. Even though the applicant's own assessment has concluded a degree of harm to a number of heritage assets no evidence has been provided to indicate that attempts have been made to reduce the harm."*

5.39 The design team also had available to it the background/SPDs cited earlier and which identify heritage as a consideration.

5.40 Of course I accept it is desirable to seek to mitigate, reduce or remove harm, but the decision maker in this case considers the planning merits of the proposals as now presented, giving weight (and in the case of designated assets particular weight) to harmful impacts.

5.41 The clear and convincing justification required as part of the LTSH balance does not, as noted, impose a freestanding test of optioneering. Accordingly, the fact that there may be some hypothetical option, now explored or presented, which has no or less harm is not material to the determination of this Appeal.

5.42 In this respect, I draw attention to, for example, policy CS33 in the RSAF which requires that *'historic features and areas of historic importance and other elements of the historic environment, including their settings will be protected and where appropriate enhanced... Planning permission will only be granted where development has no adverse impact on historic assets and their settings.'*

5.43 This is not part of the development plan, and it contemplates a binary situation, where harm leads to a fail without taking account of benefits. This approach is not consistent with the Framework.

5.44 Additionally, I note that the RSAF identifies at **Figure 7.1** Longer distance views and **Figure 7.2** Shorter distance views and it is recognised at paragraph 7.1 of the section on Views that *'It is likely that the scale of development proposed will have a significant effect on views within the station area and the rest of the centre, and on views of the centre from further afield.'*

5.45 The RSAF does not, however, treat any of these views as creating a protected silhouette or suggest them as comprising an absolute height threshold.

OTHER CONSENTS IN THE READING STATION AREA FRAMEWORK

I note that the ES assessed a number of recent consents within the area around the Appeal site, and these are included in the EIA work as cumulative schemes in the usual way.

I have considered the following nearby consents:

- The former Royal Mail site (which is recommended for approval and is due to be heard at planning committee the day after the exchange of this evidence, Ref.182252/OUT)
- The Former SSE site
- 29-35 Station Road
- Station Hill
- 55 Vastern Road (allowed at appeal the week before this evidence was exchanged)

5.48 Each of the above sites were located in the Reading Station Area Framework area and in the settings of listed buildings and the Conservation Area considered in the Appeal case. These cumulative schemes are shown on the plan at **Figure 5.1**.

5.49 I note briefly the assessment of the impacts on the heritage assets identified in the former Royal Mail Sorting site where officers identified a very low

- degree of less than substantial harm to the main Reading Station building (para 6.2.30 of the Committee report).
- Officers commented on the need to bear the context in mind, commenting at paragraph 6.2.29 of the Committee report that the RSAF recognises: *"The approach to building massing should be dramatic, with a new cluster of taller buildings forming a new and distinctive skyline for the Station Area as a centrepiece of the centre"* (paragraph 6.13 of the RSAF).
- Officers undertook a balanced assessment of the impacts of the scheme, commenting on the intervisibility of the proposals with the station building and recognising that ... it is inevitable that from some viewpoints the impact will be greater than others, with a reasonable approach being a focus on those specifically identified in the RSAF when reaching conclusions' (para 6.2.30).



Figure 5.4 Cumulative schemes in the setting of the site. The site is indicated in a light blue colour.

6.0

DESIGN CHARACTERISTICS OF THE PROPOSAL

VASTERN COURT, CAVERSHAM ROAD

DESIGN CHARACTERISTICS OF THE PROPOSAL

- 6.1 In this section I undertake an appraisal of the design, highlighting key features and I also to some extent assess the content of the proposals.
- 6.2 I undertake the assessment with reference to the National Design Guide (2021) (CD7.17) topic headings and for completeness, since an understanding of design is part of the contextual assessment necessary in setting cases, the National Model Design Code (2021) (CD7.18). There is design evidence provided by Mr Collins and townscape and visual evidence by Mr Chard. This analysis is not intended to replace that. It is here because the Appeal site forms part of the listed station's setting.
- SITE AND CONTEXT**
- 6.3 The site is currently made up of the retail park and its surface car parking which collectively take up a significant portion of the town centre's central area. I include an existing site plan at **Figure 6.1**.

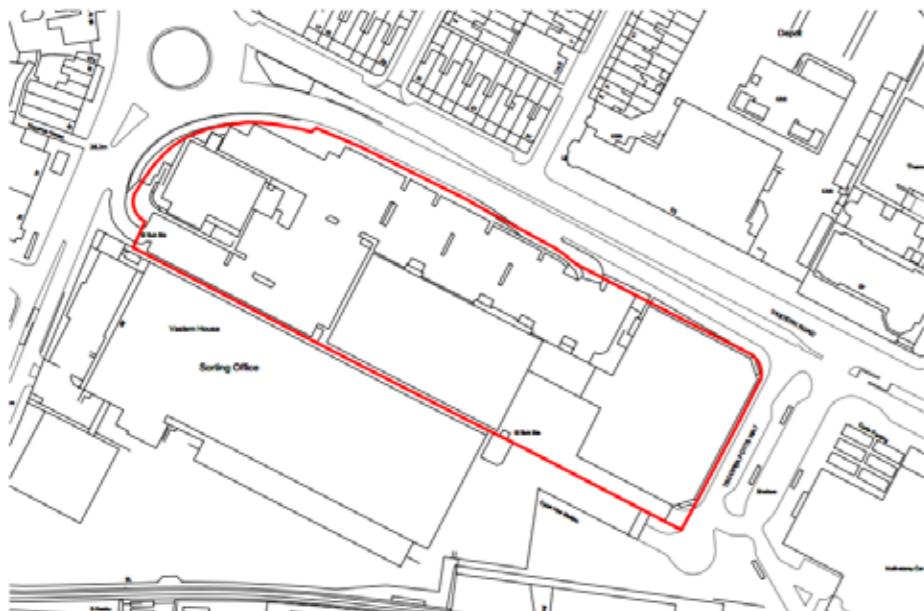


Figure 6.1 Site plan, extracted from the Design Code.

- 6.4 It is long and linear in footprint, (approximately 75 metres deep and 225 metres long) with approximately two thirds of its area taken up with surface car parking, providing very limited definition or enclosure to the street edges.
- 6.5 The immediate public realm surrounding the site is car dominated with disjointed and narrow pedestrian footways and limited crossing points.
- 6.6 The large box retail units at the southern and eastern edges of the site are largely inward facing, presenting unwelcoming blank frontages.
- 6.7 Their scale and proportions are focused solely on their internal requirements, offering no sense of character or positive interaction with the surrounding context.
- 6.8 The south-eastern corner of the site fronts onto the recently landscaped station square public space and taxi rank.
- 6.9 Vastern Road and Caversham Road form the site's western and northern boundaries. They are busy traffic arteries wrapping around the central area of the town centre, creating barriers to safe and accessible pedestrian movement.
- 6.10 Notwithstanding development from the 1980s (large box between Vastern Road and the railway), some evidence of historic urban fabric and street pattern remain to the north and west. The historic core lies to the south, whilst it has been eroded in parts through recent development, it remains appreciable and valuable, which is recognised in the CA designation. See my heritage assets plan at Section 7.
- LAYOUT**
- 6.11 The block structure is consistent with the outline nature of the application in providing a simple framework based on principles explained elsewhere in the evidence and in the DAS. These naturally allow for a degree of flexibility (such as uses, access points and building lines) as well as variation of articulation between each block.
- 6.12 The positioning and footprint of the proposed four blocks defined in the parameter plans are broadly aligned with the urban structure within the Reading Station Area Framework (RSAF, CD7.1). This is acknowledged in the Council's Committee Report (CD3.1).

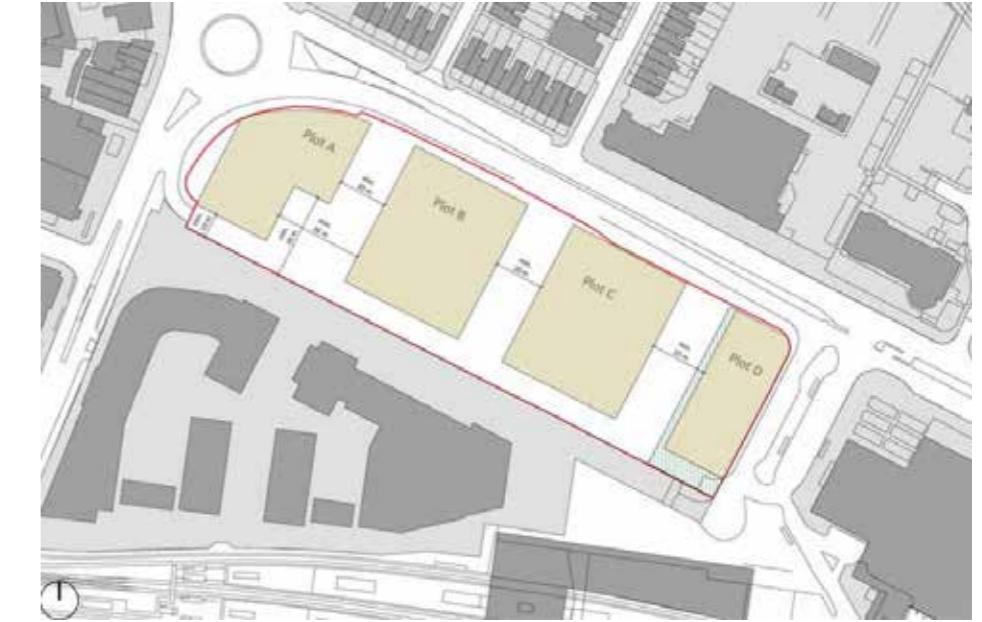


Figure 6.2 Plan showing the plot layout within the site, extracted from the Design Code.

- 6.13 In combination with the former Royal Mail Sorting Office to the south, the proposed site layout would create new pedestrian routes and spaces, as described by Mr Collado, whose evidence I adopt.
- 6.14 The parameter plans likewise set out a sequence of conventionally sized urban blocks defining public realm and streets, whose proportions and character Mr Collado explains.
- 6.15 The minimum 20 metre separation distance, increased to 23 metres along the principal Kennet-Thames Spine route between station and river has, I am advised, been set to protect amenity of outlook, and those distances are relatively standard ones in denser developments I am aware of in areas of similar intensification.
- 6.16 The Design Code (CD1.47) provides a diagram of hierarchy of frontages (see my **Figure 6.3**), with the most active or 'primary' frontages being rightly focused along the north/south link and proposed east/west Avenue. Secondary frontages are located along the Vastern Road where there would be strong potential for commercial/workspace frontages onto the main road.



Figure 6.3 Diagram showing active frontage hierarchy, extracted from Design Code.

- 6.17 The Code limits servicing or inactive frontage to the north/south links between block with minimum 25% to be active frontage in these areas. The ability to minimize servicing frontage for a mixed-use scheme of this density is extremely challenging and the Code provides flexibility.
- 6.18 The qualitative aspect of the north/south links will likely be an important factor in the future success of this development and their value in providing more intimate residential focused spaces relative to the more public routes on the edges of the site would benefit from being defined further. This point is an important one for the success of the scheme, and discussed elsewhere in evidence.
- 6.19 It is relevant to my evidence specifically insofar as those links connecting the railway provide access to the historic side of the settlement and the assets in question, which will therefore have some relationship to the new development by means of kinetic views and movement.

- 6.20 I think this does go to the setting point at issue. Seeing buildings set out according to a masterplan, in the space beyond the station (for example), conveys a destination and new identity for the town centre (which is sought by policy). Therefore, the visual effects of concern to the Council do not arise from some scheme in the background which has no relationship with the historic townscape. The connection is formed visually and physically uniting the older parts of Reading with this newer one and so giving the City Centre greater coherence. Put another way, the impact arises from a development which has a meaning in urban terms and a connection to the assets as well.
- 6.21 I contrast this situation with the situation I find in many of my setting cases, where there is a distant or background setting impact arising from a scheme that has nothing to do with the area within which an affected asset is experienced.
- 6.22 I recognise, furthermore and with reference to the other evidence, that the orientation of the site is favourable in terms of allowing potential for good levels of sunlight penetration to key areas of public realm, most notably the station square, the proposed Plaza at the western end of the Avenue link and Kennet-Thames Spine and pedestrian links between blocks. This again goes to my earlier point, on the integration of heritage settings (the station square) with this new part of the city.
- ### RESIDENTIAL QUALITY
- 6.23 This matter falls to others to consider, but the relevant matters comprise the hierarchy of public and private spaces, connection of lobbies to cores, and the treatment of those cores too. Additionally, I note (because it figured in the design review I undertook) that the Design Code demonstrates a limited number of units per core. Aspect of units has been considered.
- 6.24 This is relevant to my evidence only to the extent that I invite the Inspector to give weight to the coded, indicative scheme as credible for design development at RM stage. The point for me here comes down to not just the height of the proposals but also their mass and bulk as this is moderated by proportions and by the cladding design and materials.

HEIGHTS AND VIEWS

- 6.25 The heights parameters for each block are consistent with the RSAF in landmarking the station with the tallest building and decreasing in height towards the low-rise context to the west. This strikes me as a logical approach, recognising the importance of the station. I do not seek to reconcile this with guidance. Mr Chard discusses massing in context.

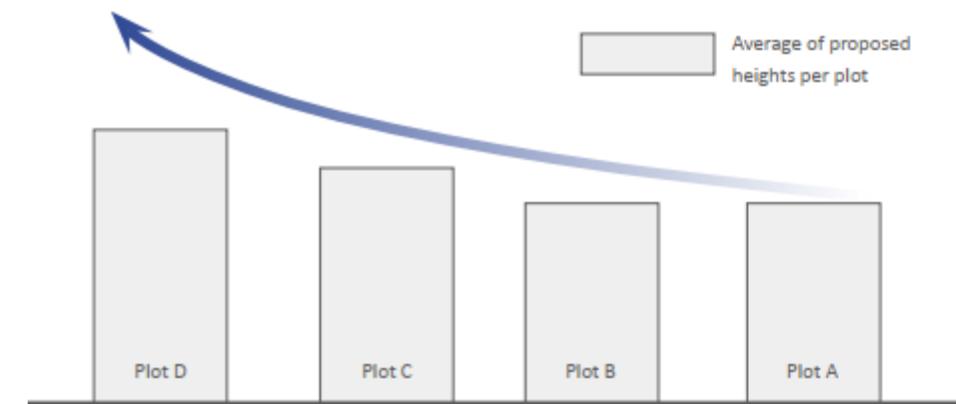


Figure 6.4 Illustrative diagram showing transition in heights across the plots, extracted from the Design and Access Statement.

- 6.26 There is also a heights strategy in place for each individual block, firstly positioning taller elements to the south-west corners to ensure a consistency and order across the development; and secondly in moulding the mass of each block to optimize sunlight penetration to courtyard spaces. Again see the DAS and Mr Collado's evidence.
- 6.27 The Committee Report acknowledges the scale of the tallest building (block D) is appropriate in terms of responding to the scale of envisaged development on the former RMSO site to form a 'gateway' to the station. The report takes particular issue with the scale of blocks D and C, which are said not to relate well to lower scale residential development nearby. This is a point for Mr Chard particularly, for the Appellant.
- 6.28 The Report's Figure 14 indicates that blocks A and B are proportionately taller in comparison to blocks C and D, relative to the Council's suggested heights for each development plot. It also highlights the RSAF's tall building height threshold of 35 metres and that blocks A and B should not exceed this.

- 6.29 The Committee Report acknowledges the spatial separation created by the width and severance of Vastern and Caversham Roads and the proposed uplift in scale is appropriate in acknowledging the edge of the town centre's central core.
- 6.30 The DAS and Design Code provide a good indication of how the pedestrian experience would perceive a varied sequence of buildings that bring a welcome structure to the townscape and humanized proportions of street width and building heights. A similar condition has been achieved along the Plumstead Road frontage at Woolwich Arsenal.
- 6.31 Importantly, the gradation in scale towards block D is clearly apparent, as are the openings to the north-south links between blocks.
- 6.32 Overall, the disposition of height across the site seems logical, as confirmed by Mr Chard and Mr Collado, which point, if accepted, again goes to the credibility of the indicative or Design Code generated scheme and hence the weight which may be given to it (which is not for me).
- 6.33 Critically, the height parameters are just that, upper limits, and the outline format is there to establish the principle. At RM stage, of detailed design for the equivalent of a full plot application, adjustments could be made to modulate the scale or address the concerns raised by the Council.

APPEARANCE AND IDENTITY

- 6.34 The approach to architectural form in the illustrative scheme is well considered and clearly rooted in its objective to introduce a strong and distinctive built character. I was party to the refinement of the indicative design, leading to the presented design code, and I comment on that basis and with reference to the discussions I had and advice I gave.
- 6.35 The predominance of red tones of brick for the residential elements bear a clear visual link with the character of the historic core of the town centre.
- 6.36 The simple framework of blocks allows for a bold language that is rooted in the heritage of the place but also sets a benchmark for the future character of Reading to emerge.
- 6.37 The Design Code sets out a clear and easily implementable series of rules, most importantly definition of base, middle and crowns of buildings. This allows sufficient flexibility to deliver a scheme that is ordered and responsive to its immediate and wider setting while also allowing space for architectural innovation and visual distinctiveness. It also allows for buildings that can have human scale, a set of proportional relationships that can relate tall to traditionally scaled and historic development.

- 6.38 The roof forms presented in the illustrative scheme are a reference to the surrounding residential context and create a good level of variety of roofscape.
- 6.39 My personal view is that the pitched roof forms could be used more sparingly to help accentuate lower rise elements for example, but the Code allows the flexibility to find an appropriate architecture through reserved matters stage.

- 6.40 The subtle contrast of a more formal language for the office building is successful at both the short range with the civic presence of columns responding well to the setting of the station square, and at mid-range where the gridded facades contrast with the void to solid ratio of residential facades.
- 6.41 The Code emphasizes the need to ensure a consistent, robust and high quality visual language is achieved, which is important in providing a criteria to work within at RMA.



Figure 6.5 Illustrative view of the scheme, extracted from the Design and Access Statement.

IEWS

- 6.42 The TVIA assessment (CD1.9.13) indicates an obvious uplift in scale, defining the edge of the town centre's central area in long and mid-range views. This is consistent with the objectives of the Council's RSAF.
- 6.43 Mr Chard explains, and I precis his evidence, that the variation in roofscape shown in the coded scheme can create a varied and characterful skyline bringing identity to this part of town.
- 6.44 At close range, a principal view identified by the Council is the Station Road view looking north with the station clock tower terminating the axial alignment of the high street.
- 6.45 I agree this is a distinctive local townscape view, one which should be protected and where possible enhanced. The illustrative view suggests that blocks D and C would, from different points and orientations, be positioned to frame the clock tower, be seen behind it, and from other locations maintain open sky behind it. I do not think that this more local viewing area has one single point of view, but rather it presents different prospects.
- 6.46 Whilst my assessment of the outline scheme (see my explanation in Section 10) is that the visual interaction with the tower on the main station building could lead to an element of harm due to distraction from the original roofline, I do not see that the presence of tall buildings in this view, with the illustrative detail of the scheme incorporated, is in intrinsically harmful to it (and bearing in mind it has a heritage dimension, which is my topic).
- 6.47 The presence of buildings to the north of the station and railway from within the historic core helps unite the two, overcoming the significant physical and perceptual barrier caused by the railway.
- 6.48 In the more immediate setting of the station, the buildings would be visible in the backdrop of the station, at more than 150 metres away which is relevant, but this foreshadows my later, substantive analysis and so will refer the Inspector there.
- 6.49 It should also be noted that emerging development on the former RMSO would also be apparent further to the left on the approach to the station and there is a benefit in creating a purposeful townscape composition to balance the visibility of north and south portions of the central area, either side of the station.

7.0

RESPONSE TO CRITICISMS

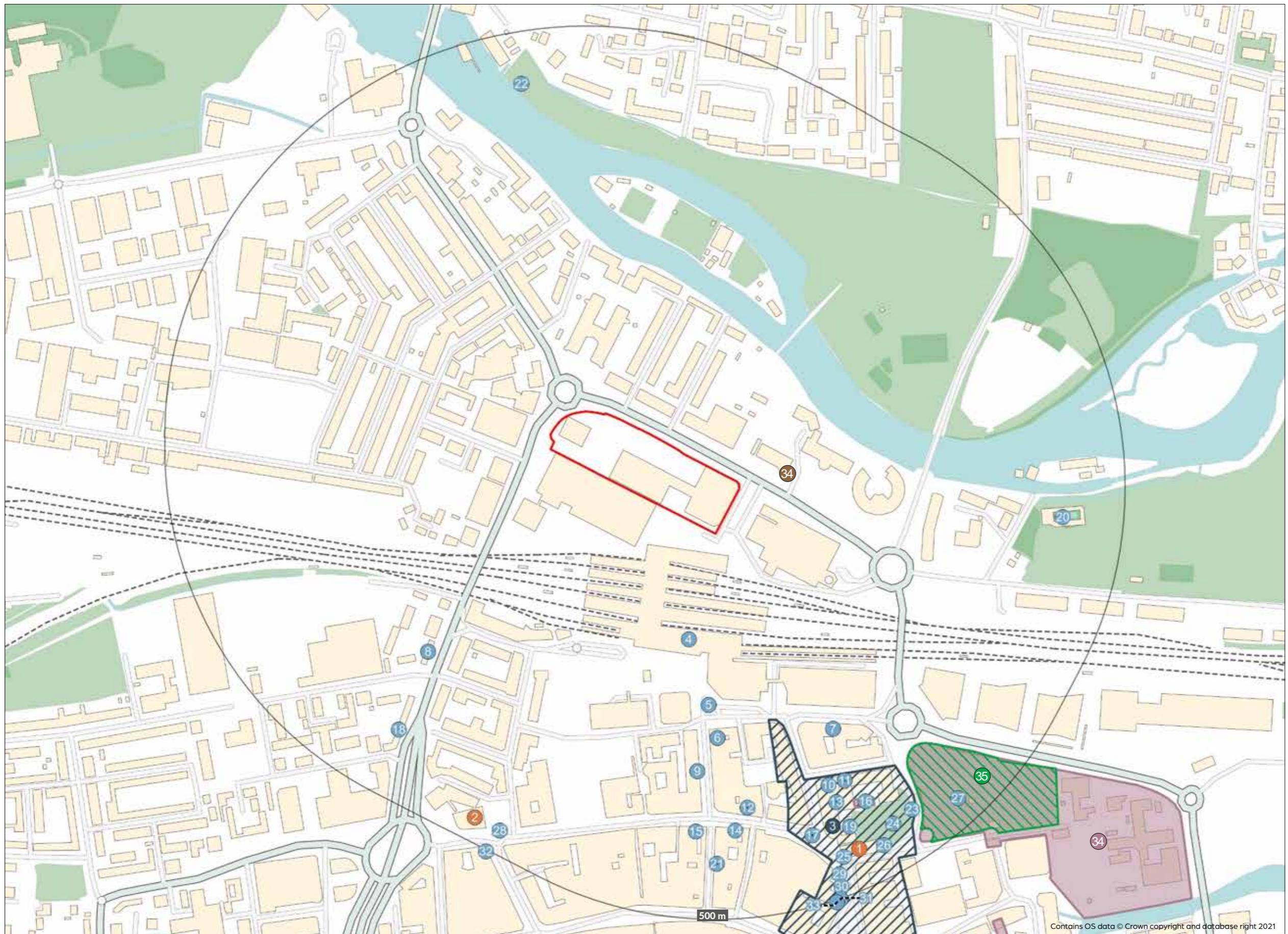
IN THE COMMITTEE REPORT

VASTERN COURT, CAVERSHAM ROAD

RESPONSE TO CRITICISMS IN THE COMMITTEE REPORT

- 7.1 I comment here briefly on the criticisms raised in the Committee Report (CD3.1) dated 15 February 2022 as to the robustness of the assessment carried out in the Baseline Study: Heritage Statement (CD1.39–CD1.41) prepared by my team and submitted with the revised ES in October (CD1.43) 2021.
- 7.2 I note that the Council's SoC and the Committee Report comment on the study radius, the completeness of the assessment of significance and the contribution made by the site to the significance of the assets identified.
- 7.3 I simply do not accept that the approach taken to setting out the significance of the assets is flawed or incomplete. The HIA, original and revised (with the consequent ES chapters) were before the Council for some time and it was open to the conservation adviser, planning officer or other parties to raise any criticisms and seek further information or clarification. They did not.
- 7.4 As to the comments on the study area, I conclude that 500m radius from the site boundaries is reasonable and proportionate, and clearly was deemed so by the Council at the time or else it would have requested a larger area. My heritage asset plan is reproduced at **Figure 7.1** for completeness.
- 7.5 Thus, and in my judgement, the 500m study area is proportionate to the nature of the proposals in my view, because of the urban environment in which the assets are already experienced, and which includes modern and larger development as well as areas identified as suitable for very significantly larger/tall development too.
- 7.6 Paragraphs 3.10 to 3.14 of the Heritage Assessment describes and explains the heritage receptors scoped into assessment. As explained there, whilst every ES should provide a full factual description of the likely effects of the Proposed Development, the emphasis of Schedule 4 of the 2019 Regulations is on the 'main' or 'significant' environmental effects to which a development is likely to give rise. The ES should be proportionate and not be any longer than is necessary to assess properly those effects.
- 7.7 In line with this approach, professional judgement has been applied to identify those assets that should be scoped in or out of the full ES assessment.
- 7.8 Thus, the ES does not purport to identify all likely direct or indirect effects but rather all significant ones.
- 7.9 The analysis and record of correspondence on the first ES led to the scoping of twelve receptors into the assessment in 2021. This is two more receptors that were scoped into the 2020 assessment and accepted as valid by RBC. This review was undertaken by my firm, and included two receptors, the Grade II* listed Former Town Council Chamber and the Market Place Conservation Area.
- 7.10 A full description of why the remaining receptors falling within the 500m radius were scoped out is set out from paragraphs 3.15 to 3.27 of the Heritage Assessment.
- 7.11 Notwithstanding the above, I note the Council's witness, Mr Bridgland identifies in his SoC (Appendix K of the SoC) that within 1km of the site there are 193 listed buildings, 4 conservation areas, 2 scheduled monuments, 2 Registered Parks and 11 locally listed buildings. I refer to the Tall Building Strategy which provides a very good analysis that concludes, first, that the historic environment has a mixed context and is not cohesive in many respects, and, furthermore, that there are a number of quite important assets located in disparate settings, not continuous with the core.
- 7.12 I do not know the point of Mr Bridgland citing these numbers but I do not understand him to be asserting that every one needed a full assessment. I think that would be unreasonable in the circumstances, and I do not understand his evidence will do that (at least judging from the main topics he covers in his statement appended to the SoC).
- 7.13 In fairness, the Council's witness goes on to confirm that '*In a dense urban context such as Reading, very few of these would merit full assessment of the impact the proposals may have on their significance; even with a tall building proposal such as this only the closest or those with particular sensitivities are likely to be affected*' (paragraph 2.2).
- 7.14 I note the Council's witness does not recommend that any other assets should have been considered at the application stage, nor does he scope more assets into those considered at this inquiry.
- 7.15 For the avoidance of doubt, the Appellant's scoping report at CD1.9.17 did not receive a response from RBC with a request for a wider scoping area nor were any further views requested in addition to those that had been agreed between Barton Wilmore and RBC in October 2019.
- 7.16 Finally, and as noted earlier, if in the course of assessing the application, the Council had found any grounds to ask for further receptors to be assessed, it was incumbent on it to do so, and particularly taking into account the requirements of the regulations. The SoC's assertions has not led to a formal request for new environmental information under the terms of the regulations either.

HERITAGE ASSET PLAN



LOCATION:
Reading Station Park

DATE:
October 2021

SCALE:
1:5,000 @ A3

FIGURE 7.1 Heritage Asset Plan.

▲ NORTH



MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)207 493 4002
WWW.MONTAGU-EVANS.CO.UK

Application Site

Conservation Areas

A. Market Place

Listed Buildings

Grade I

1. Church of St Laurence
2. Greyfriars Church

Grade II*

3. Town Council Chamber and Offices with Clock Tower

Grade II

4. Main Building of Reading General Station
5. The Statue of King Edward VII
6. Great Western House
7. Walter Parsons Corn Stores
8. Regent Place
9. 13 and 15, Station Road
10. Reading Museum
11. Former School of Art
12. 11, 12, 13, 14, and 15 Friar Street
13. The Concert Hall
14. 154, and 155, Friar Street
15. 147, Friar Street
16. Municipal Buildings
17. Queen Victoria Jubilee Statue
18. 29 and 31, Caversham Road
19. Small Town Hall
20. Kings Meadow Swimming Pool
21. 1-31, Queen Victoria Street
22. Caversham War Memorial
23. Wall and Gatepiers of St Laurence's Graveyard
24. Tracery Fragments to South No 10
25. Drinking Fountain on South Side of St Laurence's Tower
26. St Laurence's Church and Churchyard and Twelve Tombs in St Laurence's Churchyard
27. Maiwand Memorial
28. Quadrant Walls and Railings to Former No 64 (Greyfriars Vicarage)
29. 23-26, and 27 and 28, Market Place
30. The Coopers Public House
31. 32, Market Place
32. The Mitre Inn
33. Trustee Savings Bank

Locally Listed

34. 55 Vastern Road

Scheduled Monuments

35. Reading Abbey: a Cluniac and Benedictine monastery and Civil War earthwork.

Registered Park and Gardens

36. The Forbury Garden (Grade II)

8.0

**MARKET PLACE / LONDON STREET
CONSERVATION AREA**

VASTERN COURT, CAVERSHAM ROAD

MARKET PLACE / LONDON STREET CONSERVATION AREA

8.1 This and the following section are essentially concerning closely related impacts identified by the Council in its Committee Report (CD3.1) and Statement of Case. The first concern is the Market Place/London Street CA and which I treat in this section. The second concerns the setting of the listed town hall as appreciated from within the CA. These are distinct assets and I discuss these individually as a consequence and the two sections should be read together.

SUMMARY OF CONSERVATION AREA APPEARANCE AND CHARACTER

8.2 The history and significance of the Market Place/London Street Conservation Area is set out in the Heritage Assessment submitted with the application and I do not repeat that description in full here. There is also an adopted appraisal, at CD7.43. My assets plan identifies the boundaries of the CA. There is also a short adopted appraisal and much historical background in the Tall Building Strategy (CD7.44).

8.3 I extract at my **Figure 8.2** the CA maps provided in the CA Appraisal which split the area in northern and southern parts. These maps shows the linear form of the CA; the different colours highlight the listed buildings (red) and buildings of townscape merit (green) identified at the time of the appraisal's adoption (2007).

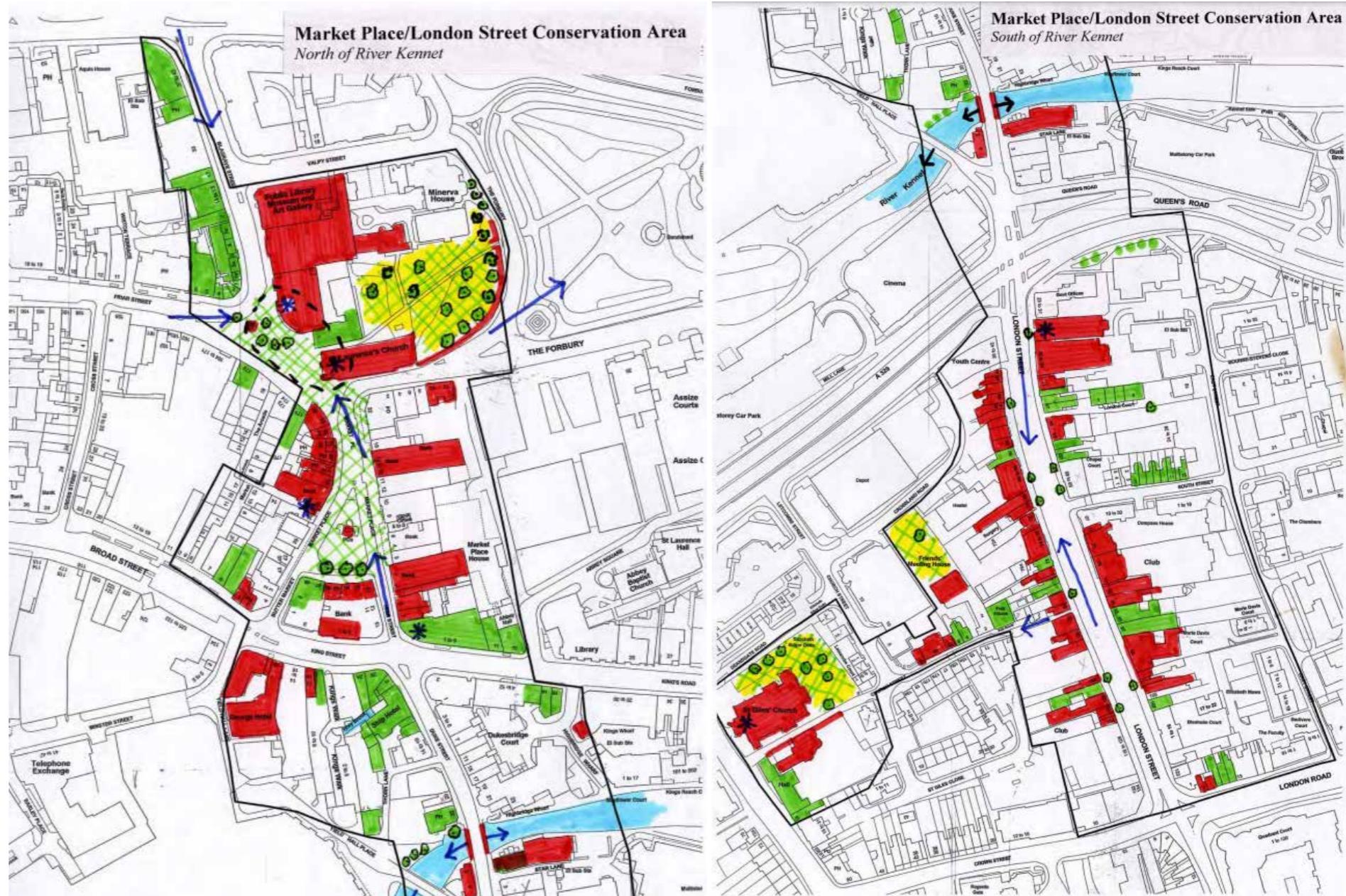


Figure 8.1 Market Place/London Street Conservation Area Maps (north and south), extracted from the adopted CA Appraisal, page 27.

- 8.4 In summary, the CA is situated to the south-east of the site and comprises most of the historic core of central Reading, including the Former Town Council Chamber, the Museum of Reading and the Reading Concert Hall. It is designated as a as a historically important local centre containing medieval, 18th, 19th and early 20th century architecture reflecting the commercial development of the town as a marketplace. The CA is split into four character areas. The character area to the north, Character Area 4, 'Market Place and environs of St Lawrence Church and Town Hall,' is the part of the CA which is closest to the site.
- 8.5 The conservation area comprises of a tight urban form and storey heights typically range from two to four storeys save for the more prestigious listed buildings along Blagrave Street.
- 8.6 The CA is separated from the site visually and physically by the railway. The wider character has an underlying and consistent urban character. The northern arm of the Conservation Area is nearer to the application site and on this basis was scoped in as it was considered there may be some visibility with the development proposals.
- 8.7 The core of the character area around the Market Place is located to the south around the municipal buildings and historic setting of the Church. The CA designation boundary does not include the Grade II listed former main building of Reading Station, which suggests to me that the Council did not consider it part of the core, irrespective of any views. I agree. Whilst there are views of it from the CA to the north, the station feels remote from the CA by reason of distance and, critically, interposing development on that axis line.
- 8.8 The Committee Report (CD3.1) refers broadly to visual impacts from the CA at paragraph 8.139, citing the areas of impact as including London Street and the 'medieval core' of Reading. The Committee Report and Council's SoC refer specifically to one view from Duke Street, looking north towards the site and the Grade II* listed town hall building, which they have roughly modelled. I presume therefore that this is the only viewing area of particular concern to the Council.

CONTRIBUTION OF THE SITE TO THE SETTING OF THE CONSERVATION AREA

- 8.9 As I discuss in previous sections above, the site is currently made up of a retail park and its surface car parking which collectively take up a significant portion of the town centre's central area.
- 8.10 The site is separated from the CA by the station, its buildings and associated infrastructure. Views of the site in its current state are not afforded from the CA and it does not make a material contribution to its character or appearance.
- THE COUNCIL'S POSITION**
- 8.11 The RBC Committee Report (CD3.1) assessed the overall effect of the proposals on the special interest of the Conservation Area at paragraph 8.143:
- In the case of the Main Building of Reading General Station and the Market Place/High Street Conservation Area the proposals will create a degree of less than substantial harm (moderate and low respectively) to their significance. As set out in the applicant's own Heritage Statement, Historic England recommends that where harm is identified, consideration should be given to options that might reduce or mitigate that harm. Even though the applicant's own assessment has concluded a degree of harm to a number of heritage assets no evidence has been provided to indicate that attempts have been made to reduce the harm.*
- 8.12 And then at paragraph 8.149 the Committee Report concludes:
- Therefore, by virtue of the proposed maximum height and siting of Blocks C and D the proposal would result in a detrimental effect on the setting of and therefore, the significance of the Grade II listed Main building of Reading General Station and the Market Place/London Street Conservation Area. This harm caused to the heritage asset's significance of these designated heritage assets must now be weighed against the benefits of the proposal.*

- 8.13 The Council's heritage witness (Appendix K to the Council's SoC) has concluded the following in respect of the effect on the Conservation Area: '*A low degree of less than substantial harm to the Market Square/London Street Conservation Area*' (paragraph 6.1).
- 8.14 Both the Committee Report and the SoC (both the summary document and Appendix K prepared by Mr Bridgland) include discussion of views of the proposals from Duke Street north, specifically reference in the main SoC as View 56 from the RSAF (CD7.1) (also in my **Section 9.0** below).
- 8.15 In considering the visual impact from this viewpoint, albeit by non-verified means, the Council are of the view that the impact seen from this viewpoint harms the setting of the CA by the intrusion of bulky tall buildings in views along Duke Street.
- 8.16 I note this specific criticism of the TVIA, and the HIA, and the fact this view was not modelled. These documents were in front of the council for a long time and I understand from my colleagues at Barton Wilmore that no consultation responses on this view were forthcoming following the consultation with RBC in October and November 2019.
- 8.17 The non-verified view prepared by the Council from Duke Street, and the references to the lack of assessment from this location leads me to assume that Mr Bridgland is relying on this view in his proof. I comment on the reliability of this image in **Section 9.0**.
- 8.18 Mr Bridgland identifies a low degree of harm to the Conservation Area. This is not, and I make no criticism of this, translated into an EIA category. I do not know if he considers this impact to be moderate (i.e. significant) or higher in ES terms.
- 8.19 I provide my initial assessment of the potential for harm to designated heritage assets arising from the visual impact in this view as part of my overall assessment.

IMPACT OF THE APPEAL SCHEME ON THE CONSERVATION AREA

- 8.20 My first observation is that the council seem to be asserting that there is a linear relationship between visibility and harm. This is not the case as set out in the Historic England Setting Guidance (GPA3) which explains you can have a beneficial, neutral or adverse impact on significance.
- 8.21 In my opinion, whilst this viewpoint is within the boundary of the CA, it is an incidental view which does not make a significant contribution to the character or appearance of the CA. I note that the Council state in their Committee Report at paragraph 8.183 that '*Overall, this is a picturesque streetscape whose character reflects the long, evolved history of this part of Reading.*'
- 8.22 I would disagree with this assessment. Whilst the architecture in the view is layered and the different styles contribute somewhat to an understanding of the townscape evolution, it is not a view of high townscape or heritage value.
- 8.23 Views of the Council Chamber roofscape and tower are glimpsed, but I don't consider that where one sees the roofscape of the Chamber at this point contributes materially to an appreciation of its significance because of the changing alignment of the road, distance and partial visibility of the asset and as a consequence.
- 8.24 Further, I don't consider the impact which is identified at para 8.143 of the Committee Report to undermine the special character of the CA. I note that Mr Bridgland disagrees with me, and that he finds a very low degree of LSTH, which on his analysis must be very low at its highest. I reserve the Appellant's opportunity to rebut on this point.
- 8.25 It is also stated in both the Council's main SoC (paragraph 6.66) and the Committee Report (paragraph 8.143) that no evidence is provided to indicate that attempts to reduce harm have been made.
- 8.26 On that second point, the Appellant did address and try to mitigate any harm through the evolution of the Design Code. I noted earlier in the policy section, with reference to the National Design Guide and the companion document, the National Model Design Code. The inspector will be familiar with those documents which place an emphasis on contextually based design. The point I wish to highlight is this. The thrust of this guidance is to support the use of Design Codes in exactly the way they are used in this

application. In light of current practice, endorsed by these documents, I consider the Design Code to be a material consideration of weight as it pertains to my area of evidence.

- 8.27 I address the level of harm now in my own concluding assessment of the effect of the Proposed Development on the character and appearance of the Conservation Area.

EFFECT OF THE SCHEME ON THE CHARACTER AND APPEARANCE OF THE CONSERVATION AREA

- 8.28 The ES assessment identified a negligible adverse effect on the character and appearance of the CA, and my conclusions on the effect are consistent with those findings.
- 8.29 Here, however, I highlight a minor error in reporting in the ES, which is not material to the findings. Where the magnitude of impact was judged to be 'negligible' in the qualitative assessment for this asset and others, this should have been specified in fact as being 'Very Low.' Working through the matrices, an overall effect of Negligible adverse is found and so there is no inconsistency in the overall conclusions, only in the way the magnitude of impact was reported.
- 8.30 An effect which has a magnitude of 'Very Low' means that 'There would be change, but it would be barely perceptible.'
- 8.31 I consider this impact now in some more detail with reference to GPA3. As I have set out above, the core focus and most sensitive parts of the Market Place Conservation Area are located to around the municipal buildings and historic setting of St Lawrence Church. There are of course glimpsed views of the wider townscape and in particular the larger buildings around the station.
- 8.32 Taking the location of the site and distance from the asset into account (some zoom at its closest point), and the nature of the interposing buildings of the main Reading station and associated modern development, the visual prominence of the development as seen within the CA will necessarily be limited by the orientation and the physical separation from the asset. Consented developments in and around the RSAF are visible from the northern most character area of the CA which mean the appeal scheme would be seen with other similar schemes in terms of scale, form, use and layout. Views of the development will signal

the intensification of the areas around the station as envisaged in the RSAF and associated policies, but this will accord with the already urban character of this part of the town centre.

- 8.33 I have already considered the effect of the development in the view identified by the Council, View 56, and I do not consider that the effect shown here, and the other visual effects captured in the TVIA lead to competition with or significant distraction from the core significance of the asset.

8.34 I recognise, as indicated in the Committee Report that there may be glimpsed views of the Proposed Development from other locations within the CA, such as from London Street as indicated within the CR at paragraph 8.139. This is to be expected and is common in these circumstances where dense redevelopments are promoted within relatively close proximity to historic cities which are covered by designations. I do not consider this as in principle or intrinsically harmful and I have described already my assessment of the proposals in that context.

8.35 The appreciation of the key areas of public realm in the CA around the Town Hall, Museum and St Lawrence Church, and the important silhouette of the rooflines of these buildings will not be materially affected by views of the proposed development.

8.36 I conclude that there is at the most a very low level of LSH to the character and appearance of the Conservation Area as a result of changes in its wider setting and some limited intervisibility with the Proposed Development from some vantage points. I consider it likely that when contextualised and considered with the detail of the Reserved Matters applications coming forward at a later date this harm could be reduced further and even reversed to a beneficial change.

9.0

**THE GRADE II* LISTED TOWN COUNCIL CHAMBER
VASTERN COURT, CAVERSHAM ROAD**

THE GRADE II* LISTED TOWN COUNCIL CHAMBER

DESCRIPTION AND HISTORY OF THE TOWN COUNCIL CHAMBER AND OFFICES WITH CLOCK TOWER

9.1 The Former Town Council Chamber commenced in 1872 to the designs of Alfred Waterhouse, a Gothic revival architect perhaps most notably associated with Manchester Town Hall and the Natural History Museum. It was then extended and altered, particularly in a phase dating to c. 1795.



Figure 9.1 Town Council Chamber and Offices.

- 9.2 The building was designed in an eclectic style drawing on French High Gothic and English late medieval precedents. It is arranged over three principal storeys with a five-order tower. Its decorative detail is rich and abundant, reflecting the architectural interests of the late Victorian period. A main aspect of its interest is the careful use of different coloured facing materials, a red brick distinctive to Reading in the C19 and grey brick, which have also a contrasting texture.
- 9.3 I have not inspected the interiors but understand from photographs that they are of good quality, as befitting a major public undertaking serving an important public purpose.
- 9.4 The town hall's immediate and local setting is important for forming an appreciation and understanding of the building's architectural and historic value.
- 9.5 Views to the building from the north and west particularly capture the drama of the building.
- 9.6 That proximity illustrates the association of the two forms of government, ancient and parochial and modern and secular. The complementary style of architecture uniting them demonstrates the Victorian interest in the evolution of modern institutions from ancient ones, and also illustrates their approach to town planning. This was to cluster civic and religious uses to create a townscape group that gives meaning and identity to points of emphasis in the townscape (for example, around junctions or other points of value or functional importance).
- 9.7 I note, and for completeness, that the Council do not allege any harm to the listed church.
- 9.8 At paragraph 8.140, the Committee Report (CD3.1) notes the following:
While the view of the tower from Duke Street contributes to the character of the conservation area, no evidence has been identified that Waterhouse intended this and it is not easy to appreciate the listed building from this location. The heritage sensitivity of this view is best considered in terms of the significance of the conservation area than of the Former Town Hall Council Chamber (or indeed the other 4 listed buildings in this view).
- 9.9
- 9.10
- 9.11

THE CONTRIBUTION OF THE SITE TO APPRECIATION OF HERITAGE ASSET'S SIGNIFICANCE

The site is visually and functionally separated from the site, and makes no contribution to an appreciation of the town hall's significance.

THE COUNCIL'S POSITION

At paragraph 8.139 of the Committee Report, the Council note the following in relation to Figure 28:

Rudimentary modelling using Google Earth data and software indicates that Block D of the proposal will appear directly behind the Former Town Council Chamber. This is not a verified view, but the modelling used is consistent with the verified views created for the Townscape and Visual chapter of the Environmental Statement. This view was not modelled in the TVIA since it lies c.150m beyond the 500m radius. While the proposals would not be the only modern building in the view up Duke Street/High Street, it would be the only one which does not reflect the grain and scale of the historic town. Accordingly, it would sit as a jarring element on one of the most historic routes into the town. The proposed development will be visible from other parts of the conservation area, particularly from London Street as it rises to the South, but the effect on the narrower streets of the medieval core is more pronounced. From many parts of the conservation area the proposals will not be visible. On this basis the impact on the conservation area should be seen as a low degree of less than substantial harm

I have a few observations on this assessment, which relates in the RSAF (CD7.1) to locally identified View 56 from Duke Street and Market Place (see extracted map at **Figure 9.1**).

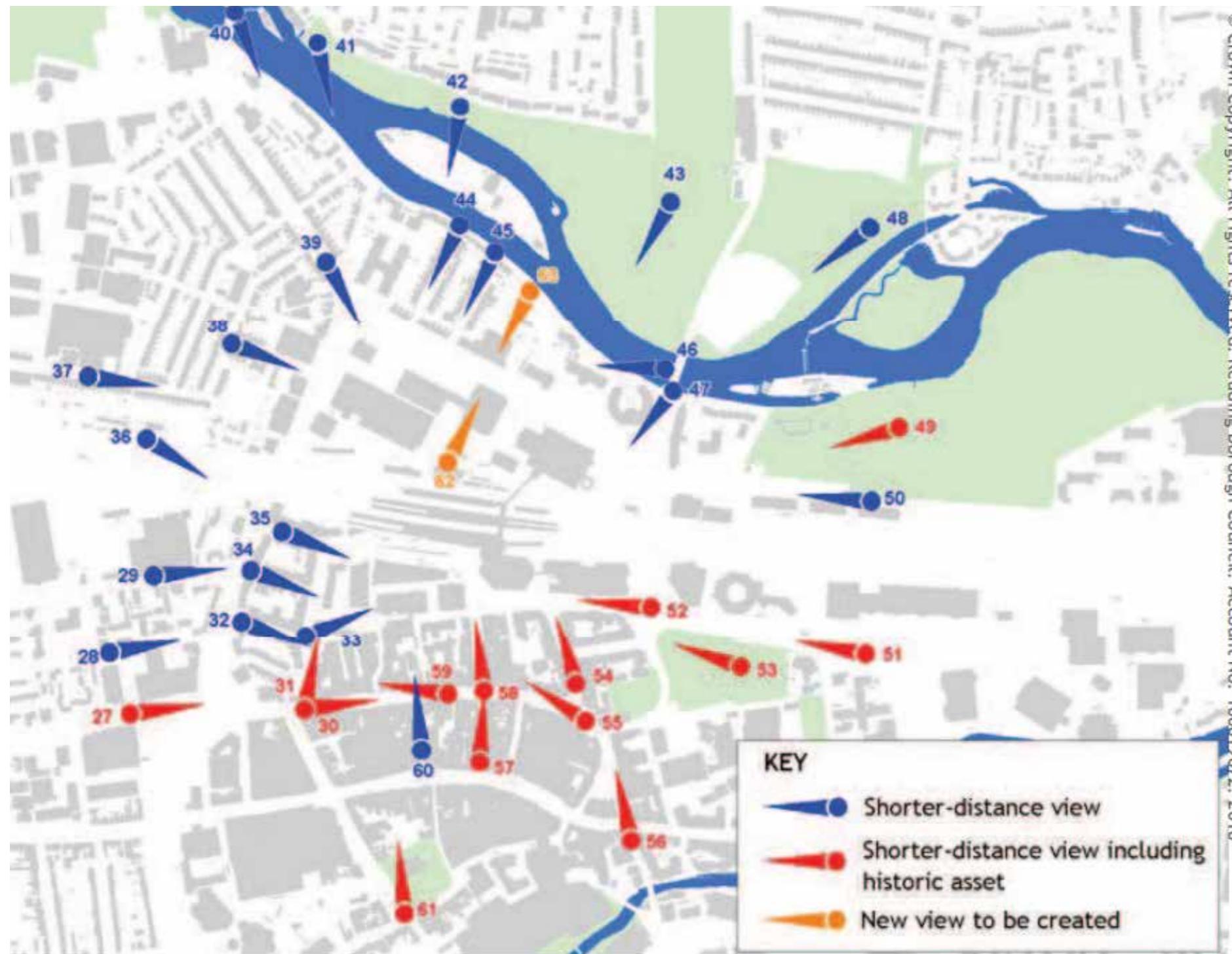


Figure 9.2 Shorter-distance views map extracted from RSAF, Figure 7.2. View 56 is shown in red, indicating it takes in heritage assets.

- 9.12 First, the excerpt alleges other impacts without any evidence even of the kind they illustrate in their SoC. Additionally, they say this is a view of particular historic importance without providing any evidence to substantiate that claim. The point is not whether it is or is not an historic route, and I can see it will likely be of some age given the position of the church relative to it, but whether the view provides an appreciation of the special architectural or historic interest of the listed building, and I will return to that.
- 9.13 First, it confirms the considerable distance as between the view point and the nearest part of the site, which is 650 metres on the Council's reckoning.
- 9.14 Second, I do not accept the Council's statement on the methodology followed by AVR London, which is best practice and deployed by a very established and experienced firm, working for close to 20 years in modelling in urban environments.
- 9.15 That methodology is explained in the TVIA, and relies on carefully surveyed base shots and the coordination of the building model with those survey points by digital convergence (I simplify considerably and commend that methodology to the Inspector's attention).
- 9.16 The Council do not provide a methodology statement to demonstrate their image is produced in the same way as a verified view. The google earth data relied on is not accurate for these purposes and the camera used for the survey is higher than the 1.6 metre eye height
- 9.17 Thus, I do not think any reliance can be placed on this image.
- 9.18 Even on this basis, the Council concludes not just a low level of LSTH but a very low level of LSTH. And that finding takes into account the high grading of the town council chamber.

THE IMPACT OF THE APPEAL SCHEME ON THE HERITAGE ASSET'S SIGNIFICANCE ALONG THIS VIEW LINE

- 9.19 Notwithstanding the health warning about this image, I feel I have to respond to it on a 'for-the-sake-of-argument' basis.
- 9.20 I must state clearly that my assessment of the effect of the Proposed Development on the significance of this asset is that the Proposed Development does give rise to a very low level of LTSH as a result of some limited intervisibility and in the absence of detailed design as would come forward at the Reserved Matters stage.
- 9.21 I disagree the effect is materially harmful to the significance of the Council Chamber however and for the following reasons:
- 9.22 First the impact is experienced over some distance.
- 9.23 Second, the town hall does not orient to the view line. It is incidental. The tower appears, rather, to be placed to close vistas from Friar Street and Market Place.
- 9.24 Third, this is a partial view of the listed building.
- 9.25 Fourth, the alleged impact will reduce materially as one walks forward into the scene and comes better to appreciate the architectural detailing.
- 9.26 Fifth, and notwithstanding that this position is identified in an SPD, I do not think it does represent one of value, communicating the special interest of the listed building. That same document shows two closer views (see **Figure 1.2**) which are, to my mind, meaningful. In that respect, I refer back to the Tall Building Study which presents a view from a point further north to that one roughly modelled by the Council, and to which no harm is alleged.

10.0

THE GRADE II LISTED READING STATION

VASTERN COURT, CAVERSHAM ROAD

THE GRADE II LISTED MAIN BUILDING OF READING GENERAL STATION

- 10.1 The station falls within the Station Area Framework (CD7.1). It is not located in or abutting the Market Place/London Street Conservation Area. It is visible in views to the north along Station Road and from Station Square. For the avoidance of doubt, Station Road does not fall within the Market Place/London Street CA.
- 10.2 The views prepared as part of the TVIA (CD1.9.13) which enable an understanding of this impact are Views 10 and 25. I note that the Tall Building Strategy document (CD7.44) does not identify either of the modelled views as key views although they are identified in the RSAF.
- THE HISTORY AND STATUS OF READING STATION**
- 10.4 The history of the development of the area around Reading station and the application site is set out in the Heritage Assessment submitted with the application and so I will not repeat that here. I do, however, want to make some salient points on the history, development and now status of the station itself in its context.
- 10.5 Reading station was opened in 1840 as a temporary western terminus of the original line of the Great Western Railway ('GWR'). The line was later extended to Bristol in 1841.
- 10.6 As first built, the station was typical of Brunel's intermediate stations, as a single sided station with separate up and down platforms to the south of the through tracks – this meant that all the up trains calling at Reading had to cross the route of the down through trains.



Figure 10.1 View of the station from Station Square.

- 10.7 The Great Western hotel was opened in 1844 to accommodate the additional tourists and day trippers visiting Reading as a result of the expansion of the railway. The station was later rebuilt and remodelled between 1865 and 1867 by Michael Lane, Chief Engineer of the Great Western Railway Company, and later in 1898 the single sided layout was replaced with a conventional design with up and down platforms linked by a pedestrian subway.
- 10.8 The station was later extended and adapted in 1965, 1989 and then between 2009 and 2015 as a significant major redevelopment to relieve the bottleneck on the railway network and to adapt the station for the arrival of Crossrail.
- 10.9 The station is 36 miles from London Paddington and is now the ninth busiest station outside of London, and the second busiest interchange outside of London, with 16.7 million passengers either changing trains or stopping at the station in 2020.
- SUMMARY OF SIGNIFICANCE AND CONTRIBUTION OF SETTING TO SIGNIFICANCE**
- 10.10 The Main Building of Reading General Station is considered of special interest, and consequently listed at Grade II, for the following reasons:
- The station's former association with Brunel and the Great Western Railway which linked London with the south-west of England, West Midlands and much of Wales



Figure 10.2 Station Square and listed building's immediate setting to the south.

- Its redesign in 1865–67 by Michael Lane, Chief Engineer of the Great Western Railway Company, reflecting the nature of growth and expansion of the railway at this time and Reading's popularity as a destination;
 - The building's imposing and distinctive Italianate design, its robust and symmetrical elevation to Station Square and square cupola/clock tower; and
 - The building's spatial relationship with Station Square and nearby assets of note, principally the Grade II listed statue of Edward VII and Great Western House.
- 10.11 The building forms a focal point of Station Square, sitting on its northern edge and orientating south into the open area of public realm. The building's setting to the north is defined by the lines of tracks that lead into and out of the station. The tracks have a separating quality, and so the site is functionally separated from the former station building, and certainly contributes nothing that aids an appreciation or understanding of its significance.
- 10.12 The recently redeveloped part of the station has reinforced a sense of focus on the historic building from Station Square, the sweeping line of the platform intercourse rising away to the west. This is mirrored to the east by the 1980s concourse, which encloses the buildings setting to this side and centres the historic station building, now The Three Guineas, with the public square.

10.13 I note presence of other tall and large buildings in the station's immediate setting, most notably Thames Tower, which further defines the bounds of Station Square to the south.

10.14 The key views of the station are largely from within this public square, and also from the direct southerly alignment of Station Road, where one gets a sense of the building's presence and experience of arrival moving north and where the building's symmetry is reinforced by the framing townscape along Station Road. That said, I do not consider that the scale of the station successfully closes that view. It is a relatively minor incident by reason of its scale and design.

THE CONTRIBUTION OF THE SITE TO APPRECIATION OF HERITAGE ASSET'S SIGNIFICANCE

10.15 As I note above, despite its relative proximity, the site is functionally separated from the historic station building by the railway tracks. There may be an opportunity to glimpse the square cupola of the station building from the eastern edge of the site, above the sweeping concourse, although I do not judge this to be a visual relationship of significance or value.

THE COUNCIL'S POSITION

10.16 The Council's position on the proposals in respect of the Grade II listed former station building are summarily defined at paragraph 18.30 of their Committee Report (CD3.1):

- "The view along Station Road towards the Station Square and its Clock tower is of strategic importance to the town's image.
- They will harm this high-quality view and detract from Reading's skyline by crowding views of the Station Clock Tower with detrimental impacts upon the existing public realm.
- They offer bulky and overly dominant massing with few visible gaps between buildings and a failure to offer a sympathetic composition of tall buildings gathered around views of the Station and clock tower.
- The upper storeys will be bulky with no setbacks or modelling of the building silhouette (and few controls offered in the Design Code to limit this)."

10.17 From reading the Committee Report and SoC, my understanding is that the harm alleged by the Council derives principally from the scale and massing of the Appeal proposals, and the potential impact this will have on the prominence of the listed building and in particular its clock tower. Mr Bridgland's SoC sets out the Council's finding of a moderate degree of LTSH.

10.18 I refer the Inspector here to my detailed consideration of the design proposals and Design Code at Section 6 of this PoE, which emphasises that the height parameters simply define the upper limits of the scheme, and that the detailed design and opportunity for adjustments and modulation has the potential to address the concerns raised by the Council as defined above.

10.19 I think it also important to note here, in my consideration of the points above, the Council's earlier comment within the Committee Report at paragraph 8.89, which makes reference to the narrative employed and the transformative change envisioned in the station's setting in the RSAF (CD7.1):

"It must first be recognised that the scale envisaged within the Tall Buildings policy CR10 and the RSAF will be highly visible and unlikely to be hidden by any existing natural or future, or manmade feature. Paragraph 6.13 of the RSAF inherently recognises this in that "The approach to building massing should be dramatic, with a new cluster of taller buildings forming a new and distinctive skyline for the Station Area as a centrepiece of the centre". Therefore, it is unsurprising that the wireline drawings show the new structures having a strong prominence within most views within the town centre and from further afield from the higher ground within and surrounding the town."

10.20 This is not to ignore that the RSAF also defines, at paragraph 6.33, that it is expected that new development should make a positive contribution to the area, conserving and where appropriate enhancing the character of and appearance of surrounding conservation areas and the setting of listed buildings. I set out my position on this point below.

10.21 On a methodological point, at paragraph 8.148 of the Committee Report, the Council states:

"No information has been provided to indicate how the proposals respond positively to the historic environment or how this has informed or shaped the new development. The

assessment above has demonstrated that the proposals do not make a positive contribution to the historic townscape."

- I have commented upon this in Section 5 of this PoE in the context of policy and the consideration of detailed design. I draw out this point below in specific consideration of the alleged impacts on the setting of the former station building.

THE IMPACT OF THE APPEAL SCHEME ON THE HERITAGE ASSET'S SIGNIFICANCE

- The assessment in the ES was undertaken on the basis of the parameter plans and the Design Code and concluded with an impact of minor / moderate adverse effect on the significance of the former Reading Station building. Specifically this impact on significance was identified, whilst not expressed exactly in these terms in the ES Chapter, to arise from the interaction with the architecturally important glazed station clock tower and the distraction and diminishing of the prominence of blocks C and D in some views from some vantage points. This was partly as a result of the height of the buildings that are proposed and that from some locations they appear behind this architectural feature. It was acknowledged that the distance between the receptor and the impact is 200m which will reduce the impression of the impact.
- The conclusion in that respect was a cautious one, and reflected the fact that the application is presented in outline. Thus, I am not able to assess a category of criteria which feature in GPA3, principally under the section 'Form and Appearance', and includes materials and character, etc.
- I have a few further observations about View 10, a focussed view north along Station Road. It is my understanding that this view was requested by HE following their initial consultation on the first application in April 2020 (CD2.29). In their consultation response, HE refer broadly to the potential impacts of the proposals on designated heritage assets in 'important views', this being one which was identified as not being sufficiently explored in the original application. I consider this view from a heritage perspective now.

- This axis is intended to integrate the existing core and near area, and so the presence of tall buildings in it helps achieve a desirable visual connection. I acknowledge that the clock tower is visible, marking a sense of arrival, but I am not aware any document seeks to preserve that silhouette without any intrusion. That would be, in my opinion, to give it more status than it warrants, because the clock tower is a relatively modest feature in this mixed context, and it is in my opinion best appreciated as part of the whole building composition from nearer to. It is a busy, urban scene, and I do not think that the principle of something seen beyond and rising behind it is unacceptable anyway.
- Nevertheless, the parameter massing has an obvious impact which would be intrusive, and so I conclude this is harmful. This and the nearer local effects I consider taken together comprise a low order of less than substantial harm on the basis of the outline. This is, as noted, capable of mitigation at RMA stage, even potentially the avoidance of any harm, if the design principles set out in the Design Code are adhered to.
- The decision maker must take into account the principles set out in the parameter plans but this must be read in combination with the Design Code as it is also submitted for approval and is a material consideration of weight and factor in the decision making process. I was closely involved in the preparation of the final iteration of the Design Code and factored this understanding into my assessment. The considerations I have factored into my assessment of the maximum parameters include the slenderness of the upper parts of the building, the width and proportion of the blocks, the articulation of the same, the use, the type of fenestration and the material palette.
- Otherwise I know that the place-making and legibility characteristics of the proposals will improve the urban realm on the site and are an appropriate response to the context of this part of the town centre and considering the policy context as I have discussed.
- To be clear as to my assessment in NPPF terms, I consider that this minor to moderate adverse impact would equate to a low order of less than substantial harm as defined under NPPF paragraph 202. The intrinsic value of the station is not affected, and I do not think the ability to appreciate its historic character, profile and architectural detailing is much diminished. It has the quality and identity of an object building, clearly linked to a major piece of infrastructure.

- Once the detail of the RMA pertaining to the site come forward, and as discussed in my Section 6, the detail at the primary scale, where the slenderness and articulation of the blocks will be appreciated, at the secondary, human scale, where the windows and interaction with the balcony, the light and shadow across the façade will be appreciated, and the tertiary scale where it will be possible to admire the detail.

- 10.22 The detailed design and illustration of these components will go to reducing the visual and setting impacts and could at that stage be judged to be a neutral or modestly beneficial effect, taking into account the benefits to the way the area, which comprises the station's setting, functions and appears.



Figure 10.3 View 10 from the TVIA (CD1.9.13).

11.0

POLICY COMPLIANCE

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POLICY COMPLIANCE

- 11.1 I have considered the performance of the Proposed Development against NPPF policies (CD7.36) in relation to each asset.
- 11.2 I confirm I have in mind the particular importance and weight that flows from the setting provision in Section 66 (1) in relation to the settings of the listed buildings.
- 11.3 I have identified a low level of LTSH to the significance of the former main building of Reading Station as a result of changes in its setting.
- 11.4 I have identified a very low level of LTSH to the former Council Chamber and the CA. This is 'Negligible' in ES terms and is very low, scarcely to register and was identified on the basis of outline application and in the absence of detailed design.
- 11.5 In NPPF terms this harm falls to be considered under NPPF paragraph 202 and weighed against the benefits of the proposals.
- 11.6 I move now to look at the development plan policies (CD4.1) which treat heritage and as identified in RfR 5 and in my Section 5 above. I have left the detailed treatment of these to others' evidence.

EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT

- 11.7 The relevant parts of Policy EN1, a general policy relating to the historic environment, states:
- Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:*
- Listed Buildings;
 - Conservation Areas;
 - Scheduled Monuments;
 - Historic parks and gardens; and
 - Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.
- All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits. Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.*
- Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration. Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.*
- The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.*

11.8 The level of harm I have identified is, in my view, not unacceptable. The clear and convincing justification comprises, however, planning benefits to be adduced and weighted by others, and so I cannot take that into account.

EN3: ENHANCEMENT OF CONSERVATION AREAS

Policy EN3 relates to the enhancement of Conservation Areas. The policy states the following:

The special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas. These may include:

- Reducing visual clutter caused by negative factors, such as poles and overhead wires, satellite dishes or unnecessary street furniture;
- Restoring original building features;
- Removing inappropriate additions or alterations to buildings;
- Protecting and encouraging the maintenance of green spaces and important trees, particularly where they are intrinsic to the history and character of the area;
- Improving signage and street furniture;
- Restoring or re-establishing appropriate paving, railings or walls;
- Sympathetic landscaping and planting;
- Improving or restoring green spaces, including front gardens, that are appropriate to the historic interest of a Conservation Area;
- Signage that reveals and promotes the Conservation Area and its boundaries;
- Interpretation panels to inform the public of the area's historical significance.

Where a Conservation Area Appraisal and Management Plan has been adopted for a particular Conservation Area, this will be a material consideration in determining applications for development.

11.10 As noted at paragraph 5.5 of my PoE, I question the relevance of including EN3 in the RfR because the policy, on my reading, does not deal with the setting of CAs. Nevertheless, and owing to the fact the NPPF treats the setting of CAs, I have addressed the impact of the proposals on the area's character and appearance in Section 8 of this PoE.

11.11 I concluded in the ES and above in my Section 8 that the proposals would give rise to a negligible adverse effect on the CA, or in non-ES terms, a very low level of LTSH to the ability to appreciate the special interest/significance of the CA, but which does not undermine its intrinsic character or appearance. Therefore, I see no conflict with EN3, assuming it applies.

EN5: PROTECTION OF SIGNIFICANT VIEWS WITH HERITAGE INTEREST

New development should not harm and where possible should make a positive contribution to views of acknowledged historical significance.

The following views merit special protection:

1. View from McIlroy Park towards Chazey Barn Farm, the Thames Meadow and the Chilterns escarpment
2. View northwards down Southampton St from Whitley St towards St Giles Church, St Mary's Church and Greyfriars Church
3. View upstream from Caversham Bridge
4. View northwards down Russell St towards the Church of the Holy Trinity
5. View over Alexandra Road Conservation Area toward the Chilterns escarpment
6. View southwards down St Annes Rd towards Downshire Square
7. View of St Anne's Church Tower from the west
8. View towards Caversham Park House from the A329(M), railway and surrounding streets
9. View southwards along tree-lined Coley Avenue

11.12 The appeal site does not feature within the key views identified under this policy. The visibility of the proposals has been considered and tested thoroughly in the submission materials and the key impacts identified. As I have explained elsewhere in my substantive analysis, I consider intervisibility with the proposals does not equate to harm to significance and do not identify conflict with this policy.

EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT

In areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:

- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);
- b. Sensitivity to historic context;
- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);
- d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.

11.13 As explained in the substantive analysis set out in this proof, I consider the requirements of this policy to be met by the proposals.

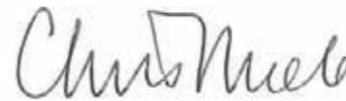
11.14 The other development plan policies in relation to design and tall buildings are handled in detail by my colleagues on behalf of the Appellant.

12.0
SIGNED AFFIRMATION
VASTERN COURT, CAVERSHAM ROAD

SIGNED AFFIRMATION

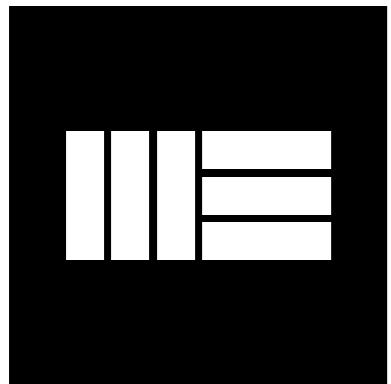
- 12.1 I confirm that, insofar as the facts stated in my Proof of Evidence are within my own knowledge, I have made clear which they are and that I believe them to be true, and that the opinions I have expressed represent my true and complete professional opinion.
- 12.2 I understand that my duty as an expert is to the Tribunal and that my role is to assist the Tribunal on matters within my expertise.
- 12.3 I confirm that my Proof of evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.
- 12.4 I confirm that my duty to the Inspector and the Secretary of State as an expert witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my evidence impartially and objectively, and that I will continue to comply with that duty as required.
- 12.5 I confirm that I am neither instructed, nor paid, under any conditional fee arrangement by the Applicant.
- 12.6 I confirm that I have no conflicts of interest of any kind other than any already disclosed in my Proof of evidence.
- 12.7 I confirm that my Proof of Evidence complies with the requirements of the Royal Town Planning Institute, as set down in the revised Royal Town Planning Institute "Chartered Town Planners at Inquiries – Practice Advice Note 4".

- 12.8 If, after I have produced this proof, my views should change on any material (for example, on the basis of new information or in the event an omission is drawn to my attention), I will communicate that to all parties without delay and when appropriate to the Inspector.



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