

VASTERN COURT, CAVERSHAM ROAD

**SUMMARY 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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SUMMARY

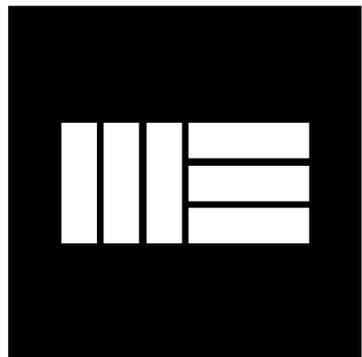
- 1.1 This proof of evidence ('PoE') is prepared on behalf of the Appellant and in relation to heritage matters.
- 1.2 It therefore addresses deemed Reason for Refusal ('RfR') 5 which is elaborated in the Council's SoC at paragraphs 1.5 and 6.58–6.68.
- 1.3 Section 2 of my PoE sets out my background 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 ('LTSH') 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 LTSH 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 LTSH 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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