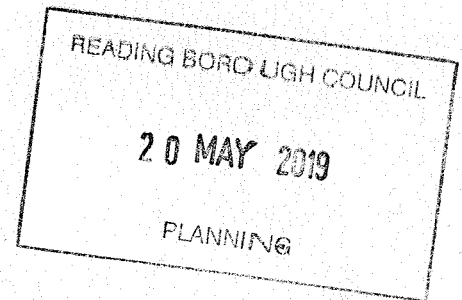


Our ref: JSL2990

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Date: 15 May 2019

Mr Jonathan Markwell
Reading Borough Council Planning
Civic Offices
Bridge Street
Reading, Berks
RG1 2LU



Dear Mr Markwell,

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings and Conservation Areas) Regulations 1990

80 CAVERSHAM ROAD, READING, RG1 1AA

Application No. 182252

In furtherance of Historic England's (HE) letter of representation of 29th April 2019 (Ref: P01063223), please find below and attached our response, the details of which I trust addresses their comments.

In summary, we consider that HE's main concerns can be summarised as follows:

- HE has identified inconsistencies between the photomontages and the Zone of Theoretical Visibility (Figure 6.3) as included within the Environmental Statement; and
- HE is of the opinion that the potential effects of the proposed development upon the following heritage assets requires further assessment:
 - Grade 1 listed Greyfriars Church and St Marys Church;
 - St Peters Conservation Area;
 - Reading Abbey Ruins; and
 - Town Hall Sq at its junction between Blagrove St and Friar Street (within the Market Place/ London Street Conservation Area).

We respond to each of these points as follows:

Zone of Theoretical Visibility (ZTV)/ Photomontages

We have included in the supporting notes to this response (see attached), a summary statement describing how the ZTV was generated. It should be noted that the ZTV shows the **indicative** area from which views to buildings within the proposed development may be available. It is not absolute, especially within an urban environment where there is considerable and very local change in roof heights; hence the ZTV may not pick up all the areas from which buildings within the proposed development may be visible. However, it is a useful tool for indicating where the main views to it are most likely to be available and, in association with the representative viewpoints, has in our opinion provided an appropriate basis for an assessment of the likely visual effects of the proposed development.

Generally, the ZTV indicates that views to buildings within the proposed development would be visible from a broader area to the north of the railway line whilst, to the south, existing buildings, including those within the Station Hill development, which forms part of the 'future baseline' to the assessment, would result in a fragmented ZTV, i.e. extremely limited availability of views to new buildings within it. Almost invariably, views from areas of the town centre to the south of the railway line would be such that new buildings within the proposed development would only be partially visible, potentially over and/or between existing buildings, including proposed tall buildings within the future Station Hill development. In our opinion, and given that only parts of the buildings would be potentially visible, any potential effects upon views would be not significant, i.e. whilst the buildings may be partly visible, they would not have a substantial characterising effect upon views, or result in any marked visual obstruction over and above that provided by existing buildings within views.

With regards to the selection of representative viewpoints for which Visually Verifiable Montages (VVMs) have been prepared, we can advise that the viewpoints were agreed with Richard Eatough of RBC (Case Officer for the proposed development) in advance of undertaking the assessment. These were based on an original list of 16 viewpoints which were derived from a previous ES for an earlier development proposal on the site containing tall buildings. However, following further discussion with RBC, additional representative viewpoints were added, and others adjusted, so that a more open view would be available to the proposed development in comparison to the viewpoints used in the previous ES. We are therefore of the view that the number and distribution of the representative viewpoints (and VVMs), which are from various distances and orientations relative to the proposed development, is more than adequate for an accurate assessment of the potential effects of the proposed development upon views to be made.

Effects upon Heritage Assets

In the supporting notes to this response, we have also included (where relevant) extracts from Chapter 6: Townscape and Visual Resources (TVRA) of the ES describing the potential operational phase effects upon those representative viewpoints and townscape character areas of most relevance to these heritage assets. These are further explained as follows:

Greyfriars Church:

Representative Viewpoint 8 within the TVRA is the nearest viewpoint to this receptor. Figure 29 within Appendix 6.2 of the ES shows that buildings within the proposed development would not be visible from this location due to the screening provided by existing intervening buildings. Greyfriars Church is also within Townscape Character Area (TCA) 7: Reading Station West, for which the ZTV indicates buildings within the proposed development would not be visible. The TVRA therefore concluded that this part of the Reading townscape would not be affected by the proposed development; a potential 'No Effects' significance of effect was assessed.

St Marys Church:

No representative viewpoint looking towards the proposed development from a location near to St Marys Church was included within the TVRA, however, the ZTV indicates that buildings within the proposed development would not be visible from this part of the town centre. The church is also within TCA 17: St Marys and Castle Street and the St Marys Conservation Area for which the ZTV also indicates that buildings within the proposed development would not be visible. The conclusions to the assessment of potential effects upon this TCA therefore was that it would not be affected by the proposed development, i.e. there would be no impact upon its inherent townscape character.

St Peters Conservation Area:

Representative Viewpoint 14 (see Figure 50, Appendix 6.2 of the ES) is from a location within the conservation area next to St Peters Church; the conclusions to the assessment of effects upon this view was that there would be a Negligible adverse significance of effect upon the view during winter, which would be reduced to 'No Change' during summer, due to the screening afforded by existing intervening vegetation. Views from the remainder of this conservation area would not be dissimilar to that from Representative Viewpoint 14, albeit some screening would also be provided by intervening buildings. In addition to this

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viewpoint, an alternative view from Caversham Court Gardens, a Registered Park and Garden, was also investigated at the request of RBC. However, no clear or unobstructed view from the gardens could be identified during field survey and the more elevated view from the church was considered to represent a more appropriate viewpoint for inclusion in the TVRA.

Effects upon the townscape of the St Peters Conservation Area were assessed as being Neutral, i.e. quality of the receiving townscape would be maintained. This conclusion was reached on the basis that views from the character area to the proposed development would be largely confined to the winter months when existing trees would be without their leafcover and that tall buildings are a characteristic of the 'future baseline' to the TVRA to which buildings within the proposed development would be added.

Reading Abbey Ruins:

Representative Viewpoint 11 (Forbury Gardens) is within the scheduled monument which includes the Abbey Ruins (i.e. the remains of a Cluniac and Benedictine Monastery) and a Civil War earthwork (see Figure 41, Appendix 6.2 of the ES). However, no specific viewpoint from within the ruins themselves was included in the TVRA. The conclusions to the assessment of potential effects upon the view from representative viewpoint 11 was Neutral significance of effect at winter Year 1, reducing to No Change during summer due to screening from existing trees. Generally, the ruins to the abbey, i.e. the enclosing walls, would naturally restrict and limit views from the abbey ruins themselves. Also, due to distance and intervening buildings any views to buildings within the proposed development are likely to be very limited, if at all available.

The Abbey Ruins are also within TCA 8: Forbury Gardens from which the ZTV indicates a fragmented level of potential inter-visibility with buildings within the proposed development. As such, potential effects upon TCA 8 were assessed as a significance of effect of No Change, as buildings within the proposed development would simply add to those which exist and which form part of the existing townscape setting to the TCA.

Town Hall Square:

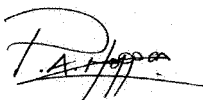
Representative Viewpoint 15 is from the Town Square (see Figure 54, Appendix 6.2 of the ES). This shows that parts of the tallest building within the proposed development would be just visible above intervening buildings during winter. Potential effects upon the view were assessed as Neutral at Year 1 winter, reducing to No Change during summer due to the screening provided by existing trees.

The square forms part of TCA 6: St Lawrence and Market Place for which the ZTV indicates that buildings within the proposed development would not be visible. As such, there would be no effects upon the inherent townscape character of the TCA. Whilst some intermittent views may be available to parts of the tallest buildings within the proposed development, these would be visible within the context of other closer, tall buildings within the Station Hill development. It is considered that the ability to see parts of tall buildings within the proposed development within limited views, and in association with others within the Station Hill development, would not alter the townscape character of this part of Reading town centre.

Using the terms within the TVRA, potential effects upon all the views from the representative viewpoints within these parts of Reading town centre looking towards the proposed development, and effects upon the character of the townscape within which each are located, would be minimal and would be not significant.

We trust our response has addressed HE's main concerns and await any further communication from you us on this matter.

Yours sincerely,
For RPS Consulting Services Ltd



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Application No. 182252

Supporting Notes in response to HE consultation letter of 29 April 2019

Zone of Theoretical Visibility Study (ZTV)

The following extracts from the TVRA (Chapter 6 of the Environmental Statement) describe how the ZTV was generated.

- 6.17 To inform the assessment, a Zone of Theoretical Visibility (ZTV) was computer generated using Terra-firma (KTF) software. It takes into account existing variations in topography or landform (see Figure 6.2) as well as the heights of existing buildings within the local surrounds. It shows the indicative extents of the study area from which views to the tallest 5 parts of the proposed development may be available. These 5 points include the top of the tallest tower and each of the towers which then step down in height progressively towards Caversham Road adjacent to the western edge of the project site. It also shows the indicative extent of the study area from which views to the tallest part of the Station Hill development may be available; this is based on the top height of Plot C, at 128mAOD, as shown on the parameter plans accompanying the planning application drawings for this proposal. It is included as Figure 6.3.
- 6.18 The ground model was developed using the following data:
- a. Open Data available from Emu Analytics for existing building heights within the study area;
 - b. additional 3d modelling undertaken by RPS to show those consented schemes with buildings over 10 commercial storeys in height forming part of the 'future baseline'; and
 - c. Ordnance Survey (OS) Terrain 5 Data.
- 6.19 The consented schemes containing tall buildings which were added to the 3d CAD model used in the production of the ZTV by RPS, were as follows:
- Station Hill (Approved July 2017);
 - Weldale St (Planning Application 170326 and 160353);
 - Kings Point Reading (Planning Application 15/0019);
 - Thames Quarter (Planning Application 16/2166); and

- Kenavon Drive (Planning Application 170509).

6.20 The ZTV did not take into account the screening effects of individual trees, hedges and other vegetation. The visibility of the proposed development has been assessed based on a viewers' eye level height of 1.6m above ground level.

Effects upon Heritage Assets listed in HE consultation letter

St Peters Conservation Area:

Extract from Table 6.14 of the TVRA concerning Operational Phase effects upon Representative Viewpoint 14

Representative Viewpoint	Sensitivity	Description of Existing View and Change to Existing View	Magnitude Impact	of Significance Effect	of
Vp.14: St Peters Church	High	Existing 'Future Baseline' View (Autumn 2018): Thames Tower, alongside the Station Hill development, is visible within the right of the view, albeit existing trees within the churchyard provide some limited screening to these buildings within the view. Further, the Thames Quarter tall building, within the left of the view, is also screened. Existing trees within the churchyard, and those within Caversham Court (at a lower elevation and beyond the low brick wall in the foreground to the view) do provide some visual obstruction and a foreshortening of the view, both in summer and winter due to their being in part evergreen. Proposed View: Winter Year 1: Parts of the proposed development would be visible within views heavily filtered by existing intervening trees. The tallest building within the proposed development would read as being at or about the height of the tallest building within the Station Hill development. The proposed development would form part of a tall building cluster within the view, with the tallest building within it forming a distinctive new element in its own right. There would be a minor change in the baseline view Summer: The proposed development would be screened by existing intervening trees within the foreground to the view. There would be no change to the baseline view.	Negligible No Change	Negligible adverse No Change	

Extract from Table 6.14 of the TVRA concerning Operational Phase townscape effects upon the St Peters Conservation Area

Townscape Character Area	Sensitivity of Townscape Resource	Magnitude of Impact	Significance of Effect
St Peters	High	Negligible	Neutral

Extract from TVRA describing potential operational phase townscape effects upon the St Peters Conservation Area

6.109 Views from the character area to the proposed development would be largely confined to the winter months when existing trees would be without their leafcover; even then some are evergreen. There would be no change to the inherent townscape character of St Peters as a result of the proposed development. Further tall buildings would be added to views already containing tall buildings; magnitude of impact would be Negligible, and the significance of effect would be Neutral.

Reading Abbey Ruins: *Representative Viewpoint 11 is within the Scheduled Monument but no specific viewpoint from within the ruins themselves was included in the TVRA. However, an extract from Table 6.14 of the TVRA concerning Operational Phase effects upon Representative Viewpoint 11 is include below:*

Representative Viewpoint	Sensitivity	Description of Existing View and Change to Existing View	Magnitude of Impact	Significance of Effect
Vp.11: Forbury Gardens	High	Existing 'Future Baseline' View (Autumn): Existing buildings within the town centre are visible above and between existing trees on the boundary to the gardens. The Station Hill development and Thames Quarter are screened. Mature trees within the right of the view obstruct views to existing buildings within this part of the view. Proposed View: Winter Year 1: The tallest building within the proposed development would just be visible above the roofline of existing buildings within the left of the view. There would be a very slight change in the baseline view, however, its quality would be maintained. Summer: The tallest buildings within the Station Hill development would be screened by mature trees (in full leaf) on the boundary to the gardens. Existing trees would also screen other buildings within the view. There would be no change to the view.	Negligible No Change	Neutral No Change

Extract from Table 6.14 of the TVRA concerning Operational Phase townscape effects upon TCA 8: Forbury Gardens

Townscape Character Area	Sensitivity of Townscape Resource	Magnitude of Impact	Significance of Effect
8: Forbury Gardens	High	No Change	No Change

Extract from TVRA describing potential effects upon townscape character areas within the southern part of the Town Centre (Generally) within which the Abbey Ruins are located.

6.111 There would be very little inter-visibility between the proposed development and these townscape character areas (see ZTV, Figure 6.6), especially at street level from which views are naturally restricted by buildings lining the streets. Further, most streets within these character areas are orientated such that channelled views along them are away from the proposed development. This is especially the case with parts of '29: New Town', the Alexander Road and Kendrick Conservation Areas and character area '14: Oxford Road and Surroundings' within which streets are broadly aligned north-south. Even where views to the tallest building within the proposed development may be available, they would be restricted views and only part of the building would be visible immediately behind and in association with tall buildings within the Station Hill development or other large buildings within Reading town centre. Effectively, these townscape character areas would remain unaffected. Whilst they would be of varying sensitivity to the type of change proposed (see Table 6.14), the magnitude of impact and significance of effect upon each would be No Change. These townscape character areas would be as follows:

- '8: Forbury Gardens';
- '14: Oxford Road and Surroundings';
- '15: Chatham Place';
- '20: London Street';
- '24: Kennet Walk';
- '29: New Town';
- '33: Southcote';
- Alexander Road (Conservation Area);

- Christchurch (Conservation Area);
- Kendrick (Conservation Area);
- Redlands (Conservation Area); and
- Russell Street/ Castle Hill (Conservation Area).

Town Hall Sq/ Jct between Blagrove and Friars Street:

Extract from Table 6.14 of the TVRA concerning Operational Phase effects upon Representative Viewpoint 15

Representative Viewpoint	Sensitivity	Description of Existing View and Change to Existing View	Magnitude of Impact	Significance of Effect
Vp.15: Town Hall Square	Medium	Existing 'Future Baseline' View (Autumn): Buildings within the Station Hill development would form the visual focus to the view and the tallest buildings within it, framed by the clocktower within the right of the view and existing 4 storey buildings within the left of the view. Proposed View: Winter Year 1: the uppermost parts of the tallest building within the proposed development would just be visible above existing buildings and within a view heavily filtered by existing intervening trees. The quality of the townscape view would be maintained. Summer: Existing intervening trees would screen the proposed development.	Negligible No Change	Neutral No Change

Potential effects upon TCA 6: St Lawrence and Market Place for which the ZTV indicates that buildings within the proposed development would not be visible, would generally be as described in the above extract from the TVRA (Chapter 6, paragraph 6.111).