



Historic England

Mr Stephen Vigar
Reading Borough Council
Planning & Building Control
Civic Centre
Reading
Berkshire
RG1 7AE

Direct Dial: 0207 973 3700

Our ref: P01556808

16 September 2024

Dear Mr Vigar

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

**FORMER DEBENHAMS DEPARTMENT STORE WEST OF YIELD HALL PLACE
THE ORACLE RG1 2AS
Application No. 221916**

Thank you for your letter of 2 September 2024 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

Historic England maintains an objection to the amended proposals for application numbers 221816 and 221817. The amended proposed towers would harm the nearby Market Place/ London Street Conservation Area through dominating tall and bulky buildings. These areas are valued as high quality urban environments that reflect the deep and rich history of the town. Reading Borough Local Plan policy CR10 only permits tall buildings within 3 defined clusters and the proposed development sits outside those 3 areas. The NPPF sets out (para 201) that harm should be avoided or minimised and there to be a presumption in favour of conservation (para 205), with any harm weighed up against public benefits (para 208).

Historic England Advice

The amendments achieve such minimally marginal gains as to have almost no discernible reduction in the level of harm the proposals would cause to the historic environment. This harm is primarily because of the dominating scale of the proposed blocks as would be experienced within sensitive locations in the London Road/ Market Place and St Mary's Butts/ Castle Street Conservation Areas.

The additional and updated views (since original comments on 20 March 2023)



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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provided by Ambiente illustrate how the proposals would also be seen within St Marys Butts/ Castle Street Conservation Area (any element of screening from trees is seasonal and dependent upon the existing trees which may die thus revealing the proposed towers). Existing buildings can be seen (looking north) as a shadow shape through the existing trees within the church yard of the Minster but the proposed buildings (as amended) would be considerably taller and more prominent. The Conservation Area reflects the position at the Saxon centre of Reading and still shows us some elements of the medieval town that existed here especially through Reading Minster (or St Mary's Butts church) which is the focal building and landmark within the Conservation Area. The deeply historical qualities of this part of Reading are illustrated in the range of buildings of 2-3 storeys high from the 16th, 17th and 18th centuries, all of which provide a rich and varied historic environment. The 2008 appraisal describes the area as an 'historic oasis' that is surrounded on 3 sides by later development. The lack of encroachment from tall modern buildings above the historic buildings is again fundamental to its historical character.

The proposed tall buildings within the development would clearly undermine and harm those qualities of the Conservation Area that allow appreciation and experience of its historical character and appearance, resulting in clear harm (less than substantial for NPPF). In addition, we are mindful of the live application for Broad Street Mall (ref 240173) and that cumulative impacts on the significance, appreciation and understanding of the St Mary's Butts/ Castle Street Conservation Area should be considered, so far as they are able to be.

There is a clear degree of cumulative harm to designated heritage assets as a result of the proposals (including clear harm to 2 conservation areas as well as individual harm to listed buildings through negative change to their setting and how they are experienced) - please see our letter of 20 March 2023 for a full and detailed assessment of those impacts. We urge the Council to consider this and give due weight to the harm to each heritage asset affected in its assessment of the impacts of the proposed development.

Historic England Position on the scheme

We reiterate our objection to the proposals.

The historic core of Reading forms a discrete part of the central area of the town and its sensitivity is recognized by the presence of two scheduled monuments, a registered historic park and two conservation areas (Market Place and London Street Conservation Area and Castle Street/ St Mary's Butt's Conservation Area), along with numerous Listed Buildings. These designations place restrictions on the form of development that might be regarded appropriate where they could interfere with the experience and understanding of these areas, and thus are governed by policies that



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seek to protect and enhance the historic character.

Reading Local Plan Policy DC10 makes clear that this area is not suitable for tall buildings, and indeed our analysis suggests that only buildings of considerably lower height would avoid harming the highly valued and characterful conservation areas of Market Place/ London Street and Castle Street/ St Mary's Butts.

Whilst better designs of the blocks may make them slightly more attractive it is unrealistic that this would remove or lessen to any great degree the harm the amended scheme would have because they are so out of scale and prominent. And so the only design solution we believe would address the heritage harm is for much lower building heights. We continue to urge the Council to work with the applicant to reimagine the scheme to create something which really does avoid or minimise the conflict this scheme proposes, as required by paragraph 201 of the NPPF.

If the applicant is not willing to further reduce the scale of the development, as the decision-maker the Council will need to assess whether this harm is justified and weigh it against the public benefits (as required by paragraphs 206 and 208 of the Framework). In doing this, the decision maker needs to give great weight to the conservation of heritage assets (tilted balance in favour of conservation paragraph 205).

It is important to take into account any heritage benefits the scheme would secure yet we are not aware of any that are put forward as part of these applications.

Given the balance in favour of conservation, the lack of policy support for tall buildings outside the 3 clusters, and the lack of any heritage benefits we believe very strong public benefits would need to be demonstrated to outweigh the harm entailed by the proposals.

Recommendation

Historic England objects to the application on heritage grounds.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 201, 206 and 208.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas and section 38(6) of the Planning and Compulsory Purchase Act



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2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

Rachel Fletcher

Inspector of Historic Buildings and Areas

E-mail: Rachel.Fletcher@HistoricEngland.org.uk

cc:



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