

Response Letter to Broad Street Mall, Reading Historic England Comments

HE Ref. P01574514

LPA Ref. 240173

We write in response to Historic England's advice letter of 9th April 2024 regarding the submitted proposals at Broad Street Mall, Reading; for which Montagu Evans prepared the Heritage, Townscape and Visual Impact Assessment (HTVIA) of the Environmental Statement (Planning Application Ref No: 240173). Our response addresses the following concerns raised by Historic England:

- Impact of the Proposed Development on the surrounding heritage assets;
- The policy compliance of the scheme;
- The use of embedded mitigation within the design process;
- Clarification of wider scheme (including heritage) benefits.

The Proposed Development

Historic England object to the application proposals and identify harm to the Grade I listed Church of St Mary's, also known as Reading Minster, the St Mary's Butts/ Castle Street Conservation Area and the listed buildings contained within it.

Historic England express concern with the size of the buildings that are proposed with this application over the taller elements of the consented scheme. We note here that there is a clear explanation in the submission materials, in particular the Design and Access Statement, and as explained to Historic England at the pre-application stage, for why the scheme has been redesigned. If it would assist Historic England in their interpretation of the scheme the applicant would be pleased to present the scheme again.

The Principle of Tall Buildings in this location

The relevant policy background is not referenced by Historic England in their letter which is an oversight. The proposals cannot be assessed in isolation from the committed policy direction of the development plan. The comments with regards to tall buildings as seen in the context of the Conservation Area and listed buildings would benefit from qualification based on an understanding and clear statement of the following.

The Site is subject to planning designations that promote tall buildings and densification in this location. These include Policy CR10b Western Grouping of the local plan, which allocates the Site as being appropriate for tall buildings. The supporting text for this policy states "*a secondary cluster of tall buildings would be appropriate to create a distinctive grouping, to mark the area as the civic heart of Reading and a gateway to the centre.*"

The Site is identified as being within the West Side Major Opportunity Area as per Policy CR12d, an area identified for significant growth, to be accommodated by "*comprehensive redevelopment.*" The Site is also located within the Minster Quarter Area, the 2018 framework for which provides supplementary guidance for the design

of tall buildings. The Minster Quarter comprises an area of the West Side Major Opportunity Area that is bound by the IDR to the west, Castle Street to the south, the Reading Minster Church Yard to the east, and Oxford Road and Broad Street to the north. The SPD suggests capacity for three towers on the Site, and a fourth within the wider Minster Quarter. The document provides guidance for the design and location of tall buildings in this location, stating that tall buildings should:

- Step away from listed buildings to the east and south, notably those on Castle Street and the Church of St Mary (Reading Minster);
- Respect and respond to adjacent conservation areas, including Castle Street CA and Russell Street/ Castle Hill CA;
- Be arranged in a 'stepped transition' with a primary tall building and supporting tall buildings.

The Minster Quarter Development Framework has identified a series of tall buildings aligned along Dusseldorf Way on the Broad Street Mall frontage. The framework describes these buildings as being above 12 storeys and should have a wider 'landmark function' through height elevation.

The Reading Tall Building Strategy (2019) identifies the Site as being within Character Area: 15 Chatham Place. The SPD identifies that the area is highly suitable for tall buildings and that the absence of notable townscape features ensures a suitability for re-development. Consideration should be given on a case-by-case basis to how tall buildings would impact upon key views along West Street to Greyfriars Church and to how they would be views from, or impact upon views of St Mary's Church.

Finally, in regard to emerging policy, the Council undertook a partial review of its adopted Local Plan in March 2023, and identified a need to update the site allocation relating to the Site (Policy CR12: West Side Major Opportunity Area). The review concludes; *"Policy CR12 should be subject to update due to:*

- *Changes to the circumstances on individual sites, including the progress of development and the award of funds for the Hexagon; and*
- *Potential impacts of changing national policy, including on matters such as increasing densities in town centres."*

More generally, to respond positively and proactively to the 2023 NPPF, the Local Plan update proposes the delivery of higher numbers of housing over the plan period and a greater proportion of larger units across the Borough, including the town centre.

At the time of writing, the NPPF is subject to an update. The draft 2024 NPPF requires that local planning authorities must demonstrate a five-year housing land supply to meet and support the provision of mixed-tenure sites. The draft NPPF removes the emphasis on 'beautiful' places, placing the focus instead on 'the importance of securing well-designed, attractive and healthy places'.

The aspirations of the NPPF were supported in a recent appeal in Reading (planning ref. 200328), where the Secretary of State disagreed with the findings of the Inspector on the grounds of heritage harm and the planning balance. The Secretary of State

determined that the great weight given to the less than substantial harm on nearby heritage assets arising from the development was outweighed by the planning benefits of the scheme, including the significant weight attached to the delivery of over 600 homes.

The use of embedded mitigation within the design, and the design development process

Paragraph 14 of Historic England's advice letter considers that the proposals have not been subject to design mitigation which has adequately avoided or minimized the harm generated by the scheme, and seek a reduction in the height and bulk of the towers.

We would like to clarify this point with Historic England and give an overview of the design development that has been undertaken to date. This was undertaken through pre-application consultation with RBC, the feedback from which has been incorporated into the design. This included five pre-application meetings with Reading Borough Council Officers and attendance at one Design Southeast Review Panel meeting. The design of the Proposed Development has more recently been subject to an addendum (August 2024), which focused on refining the design of the tall buildings. The subsequent design amendments to the scheme have been summarised below:

- The massing has been developed to create three towers rising up in scale away from the Minster with a lower building relating more directly to the scale and massing of the Minster. This approach also shields the Grade I listed buildings from higher parts of the development in the same manner as the extant consent.
- The massing of the towers is refined further through the inclusion of 'crowns' atop each of the buildings rising up in proportion from one to two to three to four storeys.
- Building A has been positioned on the corner of Dusseldorf Way and Queens Walk to reinforce key pedestrian routes and to act as a visual marker as the anchor to the development. The relocation of Building A in line with Buildings B, C and D brings the scheme proposal in line with the masterplan for the site outlined in the Minster Quarter Development Framework which envisaged three tall buildings aligned along Dusseldorf Way.
- The slenderness and elegance of Building A and likewise Buildings B and C is improved from the extant consent by bringing the building to ground rather than sitting on top of the existing car park podium. This slenderness is further enhanced by increasing the height of the scheme to enhance the vertical proportions of the building. These changes improve the slenderness ratio from 1:3.35 on the extant consent to 1:3.74 on this proposal.
- Following the Design Review Buildings A and B have been increased in height to create more slender towers and to create a clearer visual separation between the massing of each of the buildings with the scale clearly ascending away from the Minster to the east of the site.
- The main body of the buildings has changed from a double storey masonry frame with inset panels to a triple storey masonry frame with inset panels. This change from two to three storeys creates a greater vertical emphasis to

the proportions of the facade elements as can be demonstrated in the images across. The vertical emphasis and slenderness of the towers has further been improved through the removal of balconies above the 8th floor across every block of the Proposed Development.

- The design of Buildings A, B and C have developed to each incorporate grey brickwork frames with inset panels of different shades. The inset panels are a different colour on each of Building A, B and C and has been chosen to reflect the unique historic character of the centre of Reading, with a particular focus on the flint and stone materiality of the Minster. Historic buildings throughout the centre employ grey facing bricks and knapped flint. The submitted scheme used the same colour palette of greys and reds for Buildings A, B and C, whereas the addendum scheme gives each tall building its own identity using bronze and dark grey. This differentiation helps to distinguish the Buildings A, B and C from one another in views looking west, where previously they may have appeared as one mass.
- The top crown of the buildings has been made more distinct through the design addendum, which break from the grey masonry frame to continue the inset panel colour of each individual tall building. The crown elements have a higher degree of glazing which helps them to appear more lightweight against the sky. At the base, the continuation of the strong vertical emphasis, with the use of grey brick provides for a starker and stronger architectural response to reflect 20th Century heritage and provide a clear top, middle and bottom of the design.
- The design of Building D has developed following the Design Review to be composed of a combination of light grey brickwork frames with dark grey inset brickwork panels. The frames to Building D are arranged in a single storey proportion to reflect the more intimate scale of the Minster and the buildings along St. Mary's Butts. The base of Building D employs the light and dark grey bricks in a basket weave arrangement taking its visual inspiration from the adjacent building on St. Mary's Butts.

Assessment of assets listed by Historic England

The following section of this letter sets out the applicant's assessment of the effects on the designated heritage assets referred to in Historic England's advice letter. The majority of the assessment is taken from the HTVIA submitted with the application and the assessment is expressed in NPPF terms.

St Mary's Church (Reading Minster) – Grade I

Historic England identifies harm to the significance of Reading Minster by virtue of setting impact, resulting from the visual prominence, height and bulk of the Proposed Development particularly in views of the Minster and its tower from the south and east. Montagu Evans' assessment as set out in the HTVIA identifies a level of harm to this heritage asset, which is mitigated by the design of the building and the way in which the Minster is currently experienced.

The visual impact of the Proposed Development on the setting of the Minster is illustrated by Views 6, 7 and 18 submitted with the HTVIA.

The Castle Street/St Mary's Butts Conservation Area Appraisal (CAA) identifies two key views of the Minster, looking north-east from Castle Street and looking east on St Mary's Butts. From these locations, the special architectural and historic interest of the Minster and the important spatial and visual relationship between the Minster and the heritage assets on Castle Street, Gun Street and St Mary's Butts is best appreciated. In these views, the Proposed Development would be a peripheral element in the wider urban setting of the Minster and the primacy of the tower would be preserved. It is important to note that the setting of the Minster has an established character of modern commercial development to the north and east.

View 18 illustrates the impact of the Proposed Development in views looking west through the churchyard towards the Minster. In this location, the Proposed Development would be viewed in conjunction with the tower of the Minster, though partially obscured by mature vegetation within the church yard. The presence of the Proposed Development in this view does distract from the landmark quality of the tower. However, as one moves further west into the church yard, the separating distance between the Proposed Development and the Minster would be appreciable and the primacy of the tower maintained.

The impact of the Proposed Development is mitigated through design principles set by the Minster Quarter Development Framework (2018). The buildings of the Proposed Development increase in height towards the west of the Site, away from the Minster. Block D is positioned closest to the Minster and responds appropriately to the scale of the domestic scale of the intervening buildings.

Through the Proposed Development, the intrinsic historic and architectural special interest of the Minster is preserved. The elements of its immediate setting which contribute to its special interest, namely the spatial and visual relationship with the churchyard and the heritage assets on Castle Street, Gun Street and St Mary's Butts, are preserved.

Montagu Evans identify a low level of less than substantial harm to the special interest of the Minster, for the reasons stated above and as set out in the HTVIA. This is not considered to be an unacceptable level of harm to the significance of the asset and is to be weighed in the planning balance.

Castle Street/St Mary's Butts Conservation Area and the designated heritage assets on Castle Street

Historic England identifies harm to the character and appearance of the Castle Street/St Mary's Butts Conservation Area by virtue of setting impact, arising from the visual prominence of the Proposed Development to the north of the historical buildings on Castle Street and St Mary's Butts.

The letter highlights the impact of the Proposed Development on the Horn Public House (2-6 Castle Street) and 35, 36 and 27 St Mary's Butts (Grade II).

For reference, the visual impact of the Proposed Development on the setting of the Minster is illustrated by Views 6, 15, 16, 17A, 17A and 17C submitted with the HTVIA.

The CAA identifies key views which demonstrate the intrinsic character and appearance of the CA. These views have an eastern focus, moving from the western boundary of the conservation area east along Castle Street, looking south to the almshouses and terminating on the tower and principal entrance of the Minster. In views east on Castle Street, the Proposed Development would be a peripheral element in the wider setting of the receptor and the focus of the view would remain on the continuous street frontages of the historic thoroughfare, particularly the identified landmark buildings of the Sun Inn (Grade II), Church of St Mary (Grade II*) and 15, 17 and 19 Castle Street (Grade II*). In this orientation, the Proposed Development would not be viewed in direct conjunction with the heritage assets on Castle Street, maintaining the vernacular roofline and domestic scale that is characteristic of the 15th to 19th century development.

In views west and north on St Mary's Butts and Castle Street, the Proposed Development will be prominent. The Proposed Development will appear above the roofline of several of the heritage assets within the CA, notably the Sun Inn, the Church of St Mary and the Horn Inn. The Proposed Development will introduce a modern building of large scale to the setting of the CA, which is characteristically domestic in scale. In views moving westward through the CA, the Proposed Development will come in and out of prominence, illustrated by the kinetic sequence of views, Nos. 15, 16, 17A, B and C. In these views, the Proposed Development creates a backdrop to the roofline of the heritage assets in places.

Where visible, the Proposed Development would be understood as being outside of the CA boundary, in the context of the existing poor-quality open space and modern commercial and retail development which borders the CA to the north.

The Proposed Development comprises three separate tall elements, designed to break up the massing of the development, and a smaller building in the east of the Site. The height of the three tallest elements and the smaller building (Block D) of the Proposed Development steps away from the high concentration of receptors in the CA, with the tallest building situated in the west of the Site.

The appearance of the Proposed Development above the roofline of the heritage assets on the north side of Castle Street and west side of St Mary's Butts does not disrupt the spatial and visual relationship between the heritage assets within the CA, which continue to contribute to the character and appearance of the CA. The domestic scale and continuous street frontages that characterise the CA will still be discernable, particularly in views looking east and south on Castle Street, and the historic development of the medieval settlement legible.

Overall, Montagu Evans identify a low level of less than substantial harm to the Castle Street/St Mary's Butts Conservation Area, by virtue of change to its setting. This is not considered to be an unacceptable level of harm to the significance of the asset and is to be weighed in the planning balance.

Clarification of wider scheme benefits

Paragraph 8 of Historic England's Advice Letter states that no heritage benefits are put forward as part of the proposals. It should be clarified that as per Section 13.0 of the

HTVIA Chapter of the Environmental Statement prepared by Montagu Evans, that the Proposed Development will not result in unacceptable harm to the historic environment and will deliver significant townscape and urban design benefits that will contribute to the vital activities of Reading's commercial centre.

Historic England's advice letter does not address the wider benefits of the scheme, which are detailed in the Planning Statement prepared by Opus Works and include the following:

- Improvements to townscape function, visual amenity and those arising from the intensification of the land use.
- Delivery of 644 much-needed homes in support of the aspirations of the draft 2024 NPPF;
- Within this, a high proportion of larger 2 bedroom and 3-bedroom homes.
- Provision of a tenure-blind scheme, allowing all residents the same quality housing and access throughout the development.
- All homes to Nationally Described Space Standards.
- All homes with access to internal and external amenity spaces for relaxation, socialising and play.
- Rejuvenation of Queens Walk and Dusseldorf Way, making the area more accessible, safe and welcoming.
- Provision of new town centre uses on the site frontage helping with surveillance, reducing anti-social behaviour and benefitting the adjacent Hexagon in terms of juxtaposition with complementary uses.
- Enablement of greater levels of town centre living, supporting local businesses and services and creating employment opportunity.
- Significant new tree and shrub planting and urban greening and associated biodiversity new gain.
- CIL and S106 contributions arising from the scheme towards a range of services, initiatives and on-site improvements, the detail of which is set out in the following section.

Closing

We hope this letter provides some further clarity on the proposals and invite Historic England to review their feedback in light of this.

We look forward to hearing from you.

Best wishes,

MONTAGU EVANS LLP