

Memo

To: Anthony Scholes
From: Buju (Burcu) Can Cetin, Conservation Officer
Date: 18/09/2025
Re: Conservation Officer response

Application Number: PL/24/1155

Application Type: Full Planning Application

Address: JOHN LEWIS CUSTOMER COLLECTION POINT, CROSSLAND ROAD, READING, RG1 2HT

Proposal: Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 170 build to rent residential dwellings (Use Class C3) together with flexible community space (Use Class F1/F2), residents' facilities, landscaping, public realm, amenity space and cycle parking. (Amended description)

Summary

No objection – The proposed residential development, due to its position and setback distances, scale and height, would result in less than substantial harm at low degree on the setting of Reading Quaker Meeting House, listed buildings and BTMs on London Street and Church Street. Because of its height and massing, the proposal would still block some of the views of the listed Church of St Giles, causing less than substantial harm to the wider settings of the Church of St Giles and the conservation area at a low level. It is considered that the proposal would bring active public uses, spaces of well-designed landscaping and high-quality and contemporary architectural language that could lead to reaching heritage balance with regard to the public benefits.

Relevant policies and legislation

From the point of view of the historic environment, the main statutory tests are set out within the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 requires that **special regard** be given to the desirability of preserving listed buildings, **their settings** 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 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character and appearance of designated Conservation Areas.

National Planning Policy and Guidance

The NPPF outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF (2024) 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraph 207 states, *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution*

made by their setting. The level of detail should be proportionate to the assets' importance and no more than sufficient to understand the potential impact of the proposal on their significance." And Paragraph 208 says, "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (**including by development affecting the setting of a heritage asset**) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

Paragraph 212 of the NPPF requires that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation....' And paragraph 213 says, '**any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification**'.

Paragraph 215 requires that '**where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the public benefits of the proposal...**'

National Planning Practice Guidance on Historic Environment provides context to the NPPF.

Local Planning Policy and Guidance

Policy EN1 'Protection and enhancement of the historic environment' of the Reading Borough Local Plan (2019) sets out the Council's aspirations for the historic environment. The policy requires that all proposals to protect and, where possible, **enhance the significance of heritage assets and their settings, historic character and local distinctiveness of the area** in which they are located. It echoes the NPPF by stating, "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 that affect listed buildings are expected not to have an adverse impact on the elements that contribute to their special architectural or historic interest, **including their settings**.

Policy EN3 'Enhancement of conservation areas' of the Reading Borough Local Plan (2019) requires that development proposals within Conservation Areas contribute positively to local character and distinctiveness. This policy further states "**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."*

Policy EN6 'New development in a historic context' also requires ***"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."

Market Place/London Street Conservation Area Appraisal is also a material consideration in determining development applications.

Other Guidance

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for Planning Permission and Listed Building Consent.

English Heritage's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment".

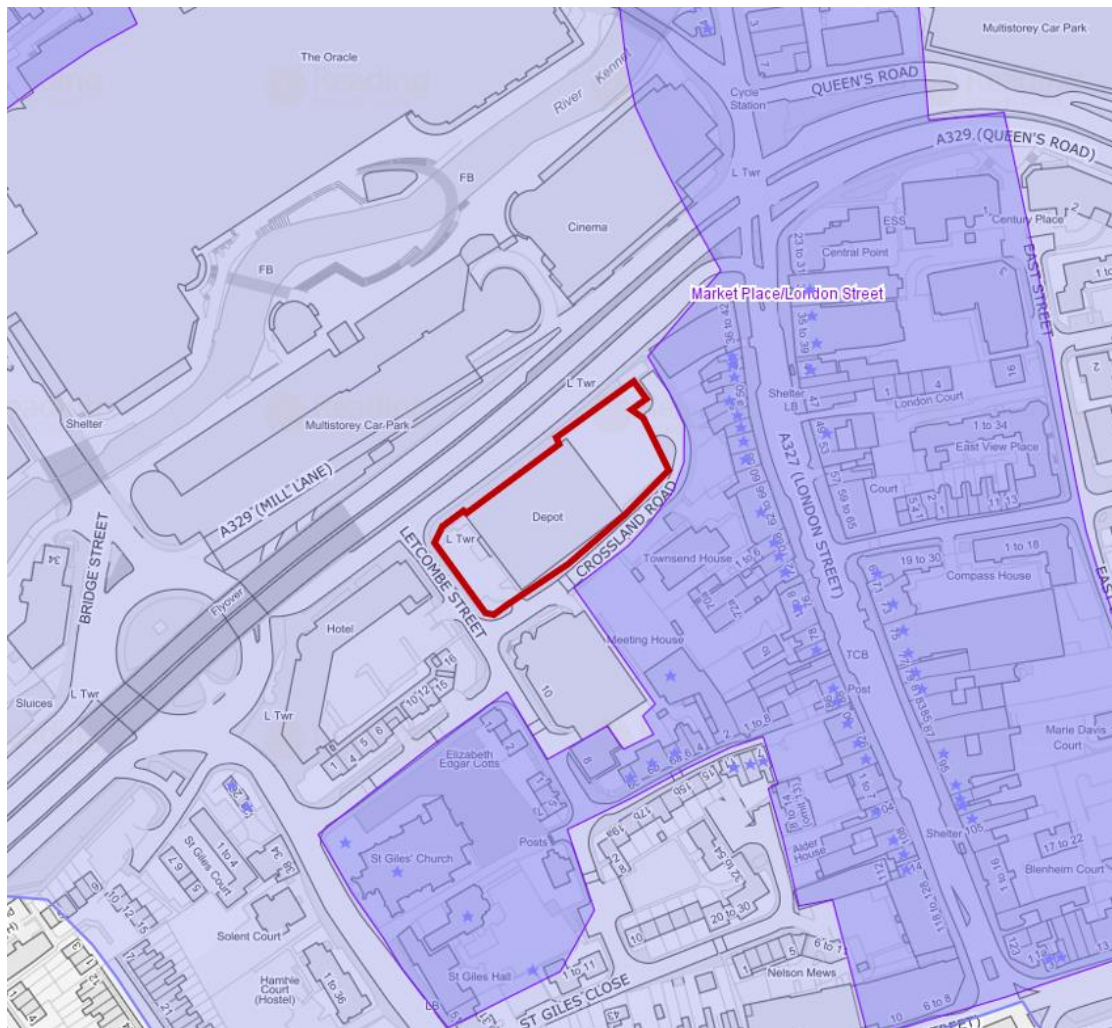
Relevant heritage assets – Please read in conjunction with my comments for the pre-app scheme, dated 10/01/2024 – shown in black and my objection dated 20/01/2025 - red. My additional comments to the latest scheme are in blue.

As illustrated below, the application site, which is located to the south of Mill Lane (A329 or the IDR), borders Market Place/London Street Conservation Area to the east and south, where a large number of Grade II listed buildings are located: 44 and 46 London Street (Mid 18th century), 48-52 London Street (Mid 18th century), 54-58 London Street (1753/4), 62-66 London Street (Early 19th century), 68 London Street (Early 19th century), 70 London Street (Early 19th century), 72 London Street (1849), 74 and 76 London Street (Mid 18th century), 80 London Street (1753), 86 London Street (Early 18th century), 88 London Street (Early 18th century) on the western side of London Street; No 33 (Former Everyman Theatre, 1843), 35 London Street (Mid 19th Century), 37 and 39 London Street (Mid 18th Century), 41 London Street (Mid 19th Century), Nos 49-53 London Street (16th century with later alterations), 69 London Street (Early-mid 18th Century), 77 and 79 London Street (Mid 18th Century), 81 London Street (circa 1800) and Grade II* Listed 73 and 75 London Street (1748) on the eastern side of London Street.

The site is also approximately 45m away from St Giles' Church, one of three medieval churches of Reading and in close vicinity of Grade II listed buildings on Church Street as follows: Reading Quaker Meeting House at 2 Church Street (1835), 6A Church Street (Early 18th century), 6B

Church Street (Mid 18th Century), 6C Church Street (late 18th/early 19th century), 7 and 9 Church Street (Early 19th Century), and 11 Church Street (Late 18th Century).

There are also many buildings of townscape merit both on London Street and Castle Street.



The application site (outlined in red), Grade II Listed buildings (purple starred), and Market Place/London Street Conservation Area (light purple)

Significance of heritage assets

The NPPF defines significance as the “*value of a heritage asset to this and future generations because of its heritage interest.*”

The interest may be architectural or historic, as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 Section 1.

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (NPPF, 2023)

Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.



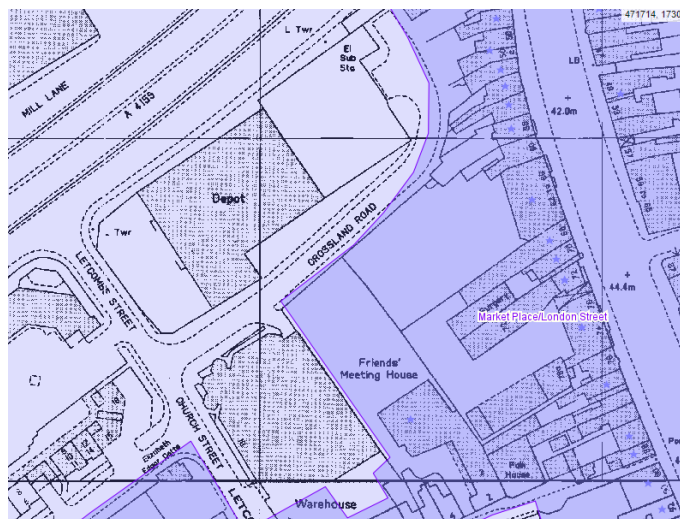
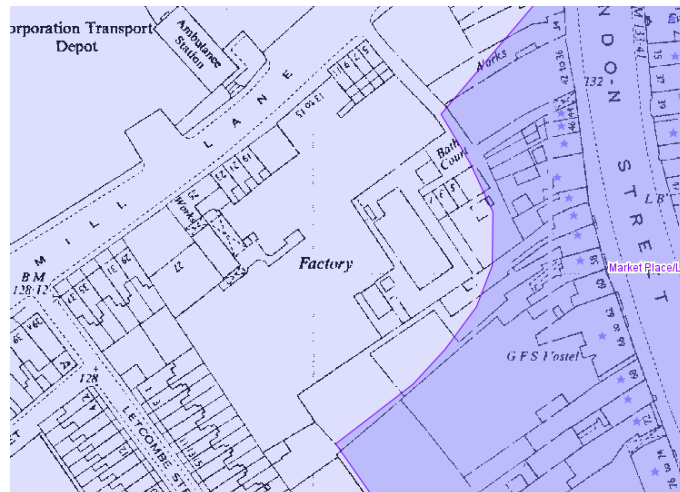
Application site (circled in red) on the John Speed's Map published in 1610

The application site lies within the southern part of medieval Reading, in close relationship with the residential developments on London Street, St Giles Street and town mills on Kennet. Later on, the site is partially occupied by militia stores on the map of 1875. It appears that the site had been linked to Kennet since the 17th century: there was a factory within the site in the 1950s and 1960s until the completion of the IDR (Inner Distribution Road) in the late 1980s, which caused the loss of historic properties on Mill Lane by enlarging it.

However, it is noted that the main characteristic of this urban block defined by London Street, Church Street and Letcombe Street have preserved their modest scale, original plot layouts, and open/green space at the centre, which enhances views to and from St Giles Church.

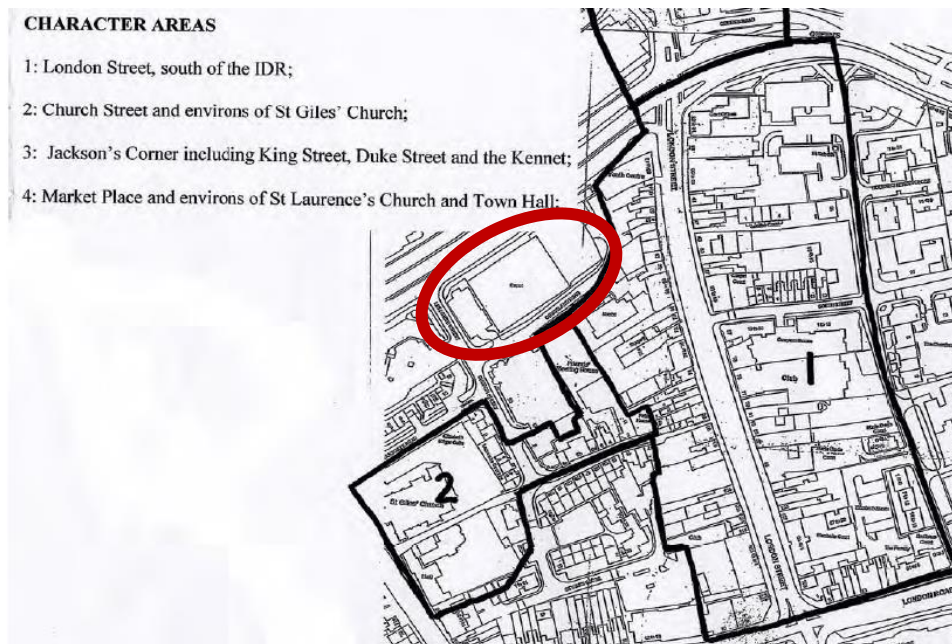


Site on the OS Map of 1875 (published in 1879)

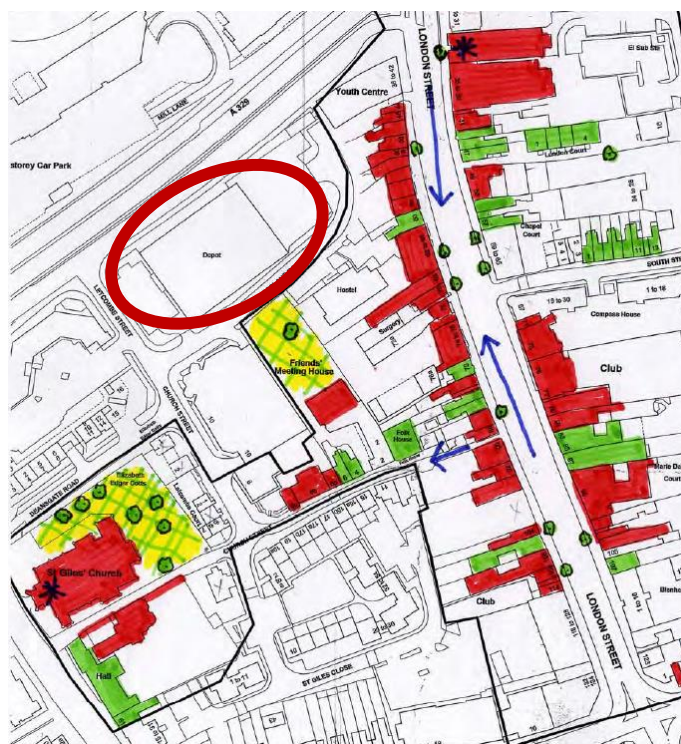


Application site appears as a factory on the historic map of the 1950s and existing depot in the map of the 1980s

Therefore, the application site constitutes an important role, being in the medieval southern quarter of Reading, where the listed buildings from the 16th, 17th, 18th, and 19th centuries are concentrated, which faces the modern development to the north and historic large open/green to the south. As shown below, it is a transition zone that should refer to the historic environment and modern Reading without creating any harm to the character areas of the Market Place/London Street Conservation Area, settings of listed buildings around, the continuing green of St Giles Church and Reading Quaker Meeting House as well as the existing views.



Relationship of the application site with Character Areas 1 and 2 of the Market Place/London Street Conservation Area (from Appraisal)



Application Site (circled in red), listed buildings (red), buildings of townscape merit (green), green areas (yellow), significant trees, and landmark building (starred – the spire of St Giles Church)

A summary of the special interest of the conservation area, in relation to the location of the application site, includes the following:

- **“Two of Reading’s three medieval churches: St Laurence’s and St Giles’, both with well treed churchyards;**
- *Isolated examples of timber-framed 16th and 17th century buildings e.g. nos 26/27 Market Place, nos 49/53 London Street and nos 3/5 London Road;*
- **Good examples of prestigious Georgian town houses in London Street;**
- *Many examples of building with bricks (red, blue and buff) from Reading’s extensive local brickworks*
- *Fine examples of 19th century banks and commercial buildings notably Barclays Bank, King Street and NatWest Bank, Market Place;*
- **Three green open spaces namely the churchyards of St Laurence’s and St Giles’ and the burial ground of the Friends Meeting House;**
- *Tranquil atmosphere of Church Street”*

The official listing descriptions of buildings within direct relationship of the site are as follows:

44 and 46 London Street

“LONDON STREET 1. 5128 (West Side) Nos 44 and 46 SU 7173 SE 3/171 II GV 2. Mid C18, altered; rear rebuilt. 2 1/2 storeys, painted brick. Mansard tile roof (No 46 old tiles) with 2 gabled 2 light (modern) dormers. 4 modern casements on 1st floor. 2 modern shop fronts on ground floor and a large through passage opening to right.

Listing NGR: SU7176873144”

48-52 London Street

“LONDON STREET 1. 5128 (West Side) Nos 48 to 52 (even) SU 7173 SE 3/172 II GV 2. Mid C18 altered. 2½ storeys. Painted brick, brick block eaves cornice. Mansard old tile roof (No 52 has lower pitched roof). 4 gabled dormers. 5 windows on 1st floor (early-mid C19 replacements probably), Nos 48 and 50 tripartite, No 52 late glazed; 2 others. Modern shop fronts, No 50 early C20. Rear rebuilt except No 52.

Listing NGR: SU7177073120”

54-58 London Street

“LONDON STREET 1. 5128 (West Side) Nos 54 to 58 (even) SU 7173 SE 3/173 22.3.75. II GV 2. 1753/4. 3 storeys, attic and basement. Brick, brick strings between floors (painted on 2nd floor). Brick dentil and moulded cornice. Parapet. No 54 has mansard slate front slope, rest and Nos 56 and 58 are old tile roof. One dormer. Each house has 3 windows, glazing bar sashes, 1st floor windows have late C18 cast-iron balconies of intersecting arch pattern. Nos 54 and 56 each have one door and modern shop window. Inside No 56 on ground floor is a reeded marble fireplace and a wide panelled hall with arch. No 58 has 2 windows (lacking glazing bars) and one door. Doors have moulded architrave surround and moulded cornice supported on consoles; Nos 56 and 58 have 6 panel doors. Cast-iron spearhead rails with patterned standards. More dormers and occasional grey brick to rear.

Listing NGR: SU7177373110”

Church of St Giles and churchyard tombs

“SU 7172 NE 4/244-244A

SOUTHAMPTON STREET (east side) Church of St Giles and churchyard tombs 22.3.57. GV II

Church of England. The small medieval church was rebuilt 1872 by J.P. St Aubyn in Early English style retaining only the C13 aisle walls and Perpendicular west tower. Ashlar steeple 1873. Flint faced with Bath stone dressings. Tiled roof. Three bay aisled nave and slight transept. Y tracery lancet windows except

i. plate tracery twin 2-light lancets in belfry. ii. 3 light Perpendicular west window. iii. Good decorated-type transept windows. iv. Geometric east window. Tower joins at skew and has corner and side buttresses. Pointed west door. Traces of mediaeval walling on south and west sides. Three bay chancel with flanking chapels. Interior: rich Early English-style chancel. Norman fragments in tower (a capital possibly from the Abbey). Early C16 brass to John and Jane Bowyer. A number of good C18 memorial tablets and a good sculpted memorial to Harwood Awberry (date 1748) by Peter Scheemakers. The graveyard retains much of its C19 atmosphere and contains a number of good tombs. To south-west: three chest tombs, the nearest to the church corner is best: early C19 to Thomas Patrick Sourdon, tapering sides, cross gabled capping with corner antefixae. The two others are circa 1840 with fluted corners. To north-west and east: another good group of both table and pyramidal-capped tombs. The best is to William Granger circa 1840 - similar to the Sourdon tomb (see above) with incised corner piers. Also notable (1) William Green and Woodard family vault - a late C18 chest tomb. Circa 1811, Portland stone, moulded plinth, oval panels to front and back. A number of tombs at the east end face true east (ie aligned slightly differently from the chancel). Listing NGR: SU7164172946"

Reading Quaker Meeting House

"Reading Quaker Meeting House, built in 1835.

Reasons for Designation

Reading Quaker Meeting House of 1835 is listed at Grade II for the following principal reasons: Historic interest:

* as the third purpose-built meeting house serving Reading's Quaker community, established by 1655.

Architectural interest:

* as a modest but dignified early-C19 meeting house, demonstrating the simplicity characteristic of Quaker buildings; * the meeting room has a restrained elegance, with distinctive features illustrative of its historic use, including the central arch which formerly held a dividing screen, and blocked doorways which led to separate rooms for women's and men's business meetings; * the meeting room retains original joinery, including the stand with its fixed bench, and dado panelling; the building's sash windows also survive.

Group value:

* with the attached Quaker burial ground of 1715 to the rear, as well as with C18 houses in Church Street."

I would like to draw attention to the significance of the following heritage assets/groups that summarise the key features when designing and proposing a new development for the application site, as the impacts of these would be considered more harmful with regards to paragraphs 207 and 208 of the NPPF (December 2004) which requires 'proportionality'. That is, the details for the description of the heritage significance for the affected asset should relate to the scale of potential impacts. **In other words, for the major projects/large-scale residential projects, the spatial area affected would be larger, and the number of heritage assets affected by the proposal would have greater negative or positive impacts.**

Given the scale of the proposed development and the high number of heritage assets adjacent to the application site, the spatial area of impact would constitute important values of heritage of very high significance:

- Concentration of many listed buildings from the 16th, 17th, 18th and 19th centuries. The fact that the majority of these buildings are Grade II listed does not mean that they have the lowest significance. On the contrary, they compose around 90% of England's historic environment, and their special interest is the first place to be protected.
- The Market Place/London Street Conservation area is composed of a large number of listed buildings and buildings of townscape merits (BTMs), non-designated heritage assets: it has a particular/distinctive feature of building groups and consistent historic character.

- Church of St Giles, as mentioned before, directly relates to the historic residential development of southern Reading, it has not only spatial relationship, but also visual one with the listed buildings on Church Street, London Street and Southampton Street. As it is one of the three medieval churches of Reading, it is one of the main landmarks for over centuries.

It should be added that the existing single-storey depot building, although it could be argued to make no contribution to the setting of heritage assets (both designated and non-designated) due to its modest scale, height and appearance, is considered to make little / neutral contribution to the significance of the assets. It also creates a buffer zone between the existing six-storey hotel and two and three-storey buildings of the historic environment and therefore the replacement building(s) should be of better design and not cause substantial harm.

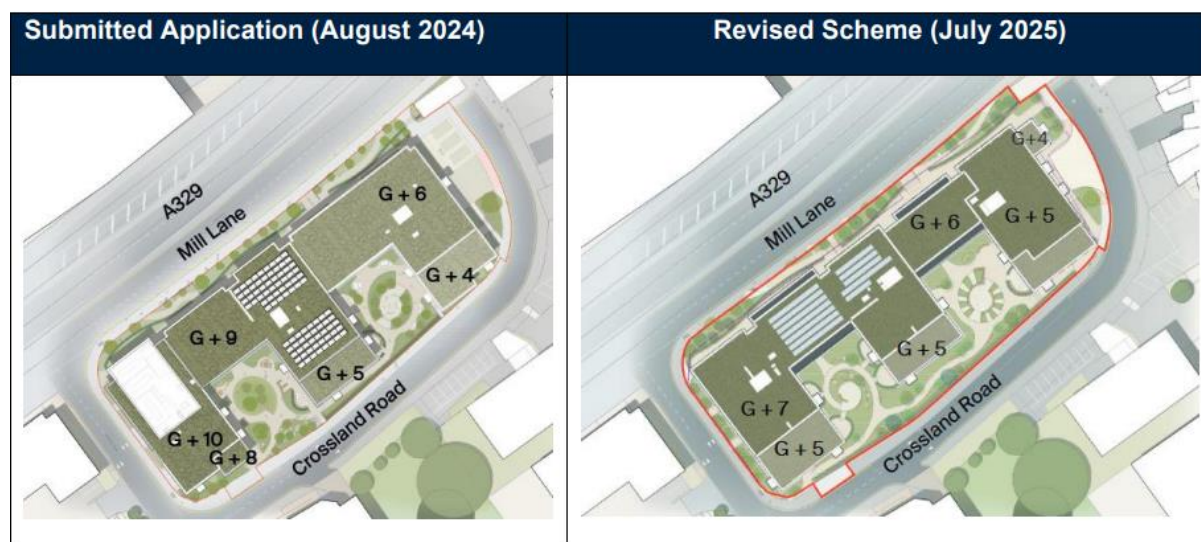
Impact of proposal upon heritage asset(s)

I welcome the updated description of the proposed development.

With regards to the revised scheme, I reviewed the Covering Letter, Planning Statement Addendum, Updated drawings, Updated Heritage, Townscape and Visual Impact Assessment, Updated landscape drawings, and Updated Landscape Strategy.

From the covering letter, I noted that considerable changes have been made to the height and massing, along with the reduction of the footprint to include more green space, in addition to many other revisions listed in the letter.

The Planning Statement Addendum explains more about the Revised Scheme, advising that it has 5 to 8 storeys, more stepped down, and the addition of a 'nib' for better transition to the conservation area (as illustrated below), all of which are positives of the latest proposal.



From Page 12 of the Planning Statement Addendum

I also noted that the elevation design had undergone a detailed review and alterations, as had the landscaping proposals.

The following summarises the positives of the revised proposal:

- **Not only massing distribution but also the relationship with heritage assets appears to be reconsidered to leave more space, create landscape zones**

providing smooth and soft transition from new urban grain to the traditional one in the conservation area and the surrounding environment.

- Mill Lane frontage would have a more active function due to the proposed ground floor layout and exciting design details reflected on the façade: living wall, gym and wellness, defined entrance, space for work, cycle hub, refuse and plantrooms, which would include glazing, lighting, various pattern details and articulation by some local artists.
- As such, I am convinced of a high-quality design showing more respect for the historic environment and integrity. The proposed east elevation is plainer and simpler, not competing or detracting. Although I find brickwork quoin detail and brickwork corbelling to create a strong top a bit unnecessary, contrasting brickwork window surround and bronze aluminium cladding are good contemporary elements with pleasing appearance.

The submitted Heritage, Townscape and Visual Impact Assessment describes the changes made to the proposed development by stating 'high rise to mid rise modern residential building in the setting of conservation area', from which I am glad to see and note that this has been such a constructive and well-received process with an open dialogue.

My opinion on the impact assessment section of this statement is given below with reference to the paragraphs of the statement.

About the Listed Buildings on London Street

9.4 (...) The Proposed Development will replace an unattractive warehouse, palisade fencing and hardstanding on the Site with a carefully designed residential building and landscaped gardens. The Proposed Development would therefore improve the setting to the rear of the listed buildings. – **I AGREE**

About the Quakers' Meeting House

9.10 The massing of the building has been distributed to focus the taller elements of the scheme on the northern boundary of the Site, along Mill Lane. The rear of the building comprises three projecting blocks which step down towards Crossland Road. The blocks closest to the Quaker Meeting House (on the southern half of the Site) step down from eight to six storeys to address the most sensitive park of the Site. From within this space, the Proposed Development will not exceed and accords with the height datum set by Saxon House, which is prominent in the foreground of the views from the burial grounds

9.11 The Proposed Development would occlude views of the Oracle Shopping Centre from within the setting of the listed building which is a benefit to the experience of views from within the Meeting House burial grounds. The materiality and form of the Oracle is incongruous in views north from the burial ground. The façade treatment of the Proposed Development will introduce greater variation and a materiality which responds positively to the established urban context.

9.12 The materiality of the Proposed Development, which utilises red brick across the majority of the rear elevation, responds to the local vernacular materials of the listed building, and in turn the existing modern development to the rear of the Meeting House. The use of a lighter cladding at the upper storeys helps to reduce the visual prominence of the Proposed Development. – **GOOD EXPLANATION / JUSTIFICATION / BALANCE**

Listed Buildings on Church Street

9.21 The introduction of a new building and increased density within the Site would have no effect on the setting of these heritage assets, nor their intrinsic interest as examples of 18th and 19th century domestic development. Through the Proposed Development, the setting relationship between the assets within the group, and importantly the ribbon development of London Street and the Church of St Giles to the west is preserved. – **YES, NOTED**

Listed Buildings in Church of St Giles Group

9.26 Through the introduction of the Proposed Development, the spire of St Giles would be occluded from views from the north of London Street, as demonstrated by View 1. Pre-application advice letter identified harm from the loss of views of the spire in this location. We do not identify any harm in the loss of visibility of the spire in this location, as it is not considered a key view that best displays the historic or architectural interest of the listed church. We note also that the consented scheme to the east of the Site (planning application ref. 221364) will occlude the spire in this view. The primacy of the spire, a quality which contributes to its interest, would be preserved throughout the local area, notably in views on Church Street and Southampton Street (Local View 2).

9.28 On Church Street, where there is an important setting interaction between the church and the Vicarage, and there would be no intervisibility between the Development and the listed buildings in this location.

9.29 As described, the contribution made by setting to the special interest of the heritage assets within this groups lies primarily in their close historic functional and visual relationship, and the enclosed character of the church yard. Through the Proposed Development, this important setting relationship would be preserved as the new building would be separated physically and visually from the group by roadways and interposing development. The Proposed Development would not affect the intrinsic special interest of the heritage assets in the group. – **YES, THIS CAN BE SAID; HOWEVER, ONE OF THE EXISTING VALUES WOULD STILL BE LOST – THERE WOULD BE SOME HARM**

Conservation Areas

9.53 The Proposed Development would introduce a mid-rise, modern residential building to the setting of the CA.

9.55 Where visible within this small part of the CA, the Proposed Development would be understood as part of the existing modern development to the north and the relationship between the designated and non-designated heritage assets within the CA would be preserved.

9.57 The CA boundary defines an enclave of historic development which is enclosed to the north, east and west by modern large-scale development. In the context of this established setting, the Proposed Development will replace the unattractive light-industrial structure, hardstanding and fencing which currently occupies the Site. Along the north-and-western boundary of the CA, the Proposed Development would be an improvement on detracting appearance of the IDR and Oracle Shopping centre.

LITTLE HARM – OF MASSING BUT BALANCED WITH HIGH QUALITY DESIGN AND BETTER APPEARANCE COMPARED WITH THE EXISTING DEPOT

Assessment: Townscape

10.4 The Site is considered appropriate for a building of the Proposed scale and height for the following reasons.

10.5 The Site is located between three townscape character areas: TCA1: Large Scale Commercial, TCA2: Historic Core and TCA3: Residential.

10.10 There are significant opportunities to improve the way buildings on this site contribute to the public realm, both through built form and landscaping, and improve the experience of the townscape in this location on the edge of the Conservation Area. A detailed analysis of how the proposals present an enhancement to the townscape character of TCA1 is set out later in this section.

10.11 The quantum of development on the Site has been driven by the desire to make best use of the land in this central Reading location. The height, form and architectural treatment of the development has been designed to integrate the Site with its surroundings by responding to the existing townscape and heritage context. – **WHEN IT COMES TO THE INVESTMENT IN RESIDENTIAL DEVELOPMENT, IT IS HARD TO FIND THE IDEAL SCHEME. TAKING THIS INTO ACCOUNT AND THE PROCESS OF IMPROVEMENT SINCE THE PRE APP, NO OBJECTION RISES ON HERITAGE GROUNDS WHICH IS COMPOSITION OF HERITAGE IMPACTS WITH REGARD OT THE SETTING AND RELATED VISUAL IMPACTS.**

10.16 The façade treatment along the north elevation (which uses vertical setback panels) has been designed to break down the massing of the building and introduce a rhythm which replicates the ribbon development of London Street, incorporating traditional building materials and responding to the architectural language used on the Premier Inn. – **PARTIALLY AGREE. IT IS THE REDUCTION OF THE HEIGHT, MASS AND SCALE THAT MAKES A MAJOR DIFFERENCE, RATHER THAN THE FAÇADE DESIGN BUT IT IS HIGH QUALITY AND THEREFORE APPRECIATED MUCH. ALSO LANDSCAPE SCHEME ADDS VALUE/NATURAL ELEMENTS TO THE SETTING OF THE CONSERVATION AREA**

Assessment: Visual

Considering the Importance of the views and associated impact on them: Demonstrated views show the impact would be less on the important or more significant views, such as View 7.

View 1 and view 4B still include some harm expected to be balanced with public benefits, as discussed before in the impacts on the listed buildings' settings.

I still wish to see some vertical gardens in the view 4B, although nothing can be done for View 1.

(Please refer to the last page for the conclusion.) The following are my previous comments.)

The aims of the project defined within the submitted Design and Access Statement are:

- Provide much needed new homes for Reading
- Create an inclusive scheme focused around community
- **Provide high quality landscape proposals for the residents and the wider community**
- Generous internal and external amenity provision for residents
- **Prioritise green transport strategies and strengthen links to the station**
- **Maximise active frontage to all sides of the site**
- Deliver a development which promotes the principles of well being
- **Respond to the site's varied historic and emerging context**

- **A low carbon development and on site energy generation through renewable resources**
- **Improve local biodiversity through new biodiversity ecology features and habitats**
- **Strengthen links to the site and provide public realm improvements**
- **Engaging proposals with a human scale**

The proposal addresses the problems of the inner distribution road (IDR).

I note that the design and access statement describes the Church of St Giles as a 'listed landmark building' on page 26.

London Street is also defined as the Character Area 20. The statement says, "Urban grain and townscape scale: 'The fine-grained residential area has a small townscape scale'."

I also agree that the site is in a transitional location and would like to remind: half of it is attached to the conservation area and the NPPF states *"212. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). (...)"* In line with the significance assessment summary in the previous part of this document, I would highly recommend and expect that the proposal refer to the historic environment having appropriate scale and height that would blend into the urban grain 'a small townscape scale' easily, rather than modern buildings with no significance at all.

I understand and support the rationale behind the breaking the mass, increasing the height towards west and creating opportunities within the proposed scheme; however, due to its scale it would result in a considerable mass competing and imposing on the historic environment. There should have been decrease in height. Incremental massing increase of proposed building(s)/blocks could only work with lower residential blocks for this particular site.

Another important aspect is the Oracle's design. Contrary to its vertical nature, I would define it as having a horizontal emphasis as it follows Kennet. Due to its position and this horizontal design, it forms an enclosed pedestrian space. The IDR is outside of it; therefore, there is a carpark of the Oracle facing the IDR. As such, I find it a very weak argument: the extension of character area 18—Oracle and its surroundings. There is an analysis of current building heights (on page 41 of the Design and Access Statement) which guides the height of the design: it should not exceed seven storeys. Given the significance of the heritage assets, especially Church of St Giles, the massing could be shaped. However, the proposed development takes the tall buildings strategy and goes for 11 storeys -as tall buildings are defined to be 12 and more- which is a crucial inconsistency.



Master Plan (page 67, Design and Access Statement)

The proposed scheme is very similar to the one at the pre-app stage. The following still applies:

The proposed residential-led scheme, which would facilitate alternative uses on the ground floor, has undergone many revisions, the last of which was in November 2023. The latest proposal includes a built form of irregular “E” / “U” shaped footprint with sections of 5, 7, 9, 10 and 11 storeys, green flat roofs, and public and private open spaces, all of which create a solid mass increasing from south to north and east to west and the spatial voids.

The revised (final) proposal makes amendments to the number of storeys, breaks the massing, introduces variety in the elevational design and utilises further landscaping, which is all welcomed. Because of the location of the site, it is stated by the submitted Pre-App 5 Document that *“The site is closely related to the character and scale of the areas to the north of the IDR rather than the character of London Street. (p. 9)”* The conceptual design and approach of transitional zone for the site is appreciated. However, it should be noted that the application site is more related to the conservation area rather than Oracle Centre and its car park to the north, given the existing IDR being an ‘edge’, a separator of historic and modern buildings and the site’s being outside the designated tall buildings area and physically attached to the conservation area, I would suggest further revisions to the proposal. It is also advised that the undecided proposals or any potential developments for the sites nearby should not be considered as a ‘reference point’.

In terms of the existing historic environment, for the Character Area 1 – London Street, south of the IDR, the conservation area appraisal states: **“High quality townscape and well-proportioned relationship between tall building and wide street”** is one of the positive features, whereas **“Modern development at north and south extremities of London Street, adjacent to road junctions, spoils the overall historic appearance of the area”** is among the features that have a negative impact on the historic character and appearance of the conservation area.

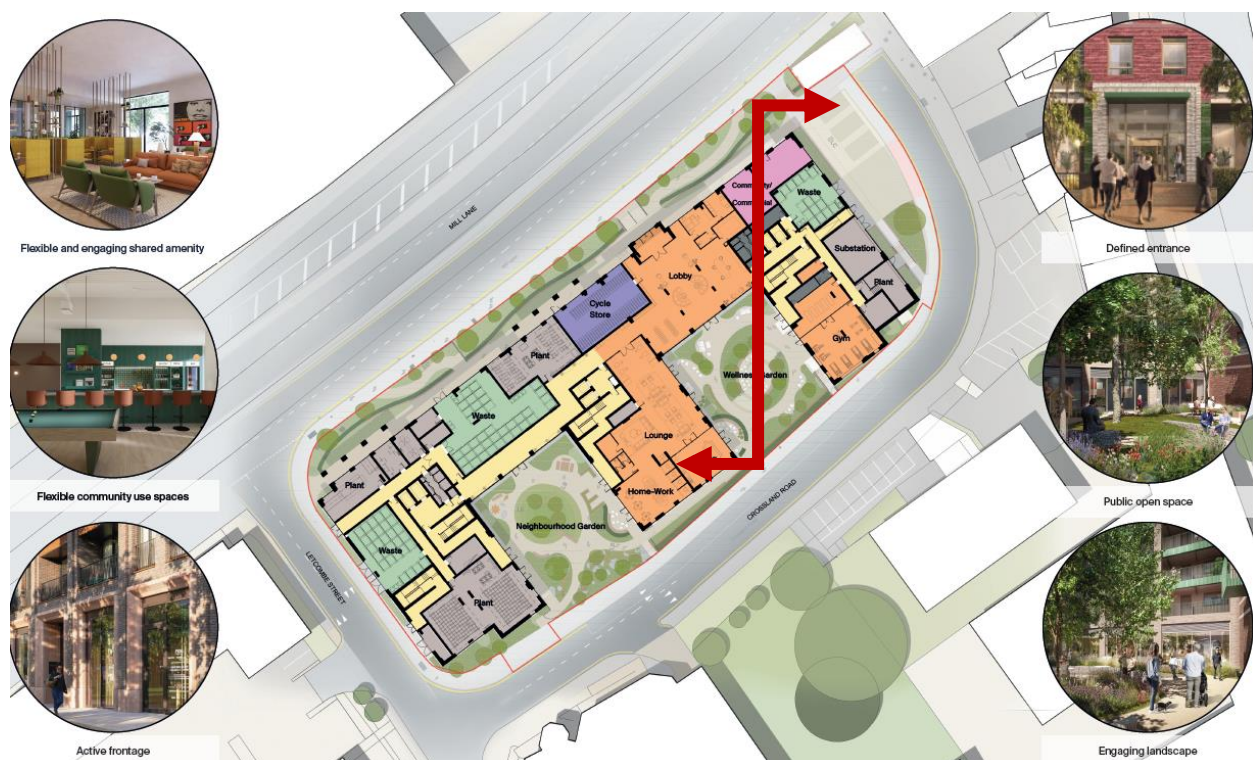
Similarly, for the Character Area 2 – Church Street and environs of St Giles’ Church, it is indicated that **“Modern housing development intrudes upon historic character”**.

Therefore, whilst the arrangement of the building and masses is considered an improvement and the ground floor plan emphasises flexible and engaging shared amenities, opportunity for public art, active frontage, defined entrance, public open space, engaging landscape, which are positives of the proposed development, it would still have a less than substantial impact on the character and appearance of the conservation area due to its scale, height, and massing.

In relation to the proposed ground plan, when it is analysed in detail – although I understand and appreciate the scheme creating community/public uses with the aim of active frontage, I cannot read that approach on the proposed ground floor uses. To the northeast of the application site, close/opposite to the central club, there is a designed community/commercial space. Other than that, to the front of the proposed block(s)/to the north, there is not any continuous or active use that would pay attention and be counted as a public interest. Next to the commercial use lobby, the cycle store, plant, waste, and plant are positioned, respectively.

I find the proposed tree line and landscaping to the front and the neighbouring garden to the rear to be among the strongest features of the proposed development, which directly relates to the surrounding environment, human scale, and heritage assets. However, the connections and 'active' use purpose get weaker given their oppressed locations. As the proposed scheme would have a very big impact on the environment in which it sits, there should have been a clear and distinctive design for public use and benefits. The use of green elements and natural features has been encouraged to soften the impact of the height of the blocks and provide a good transition. Therefore, further consideration should have been given to the design of publicly used spaces, and the ground floor plan should support their 'active' use.

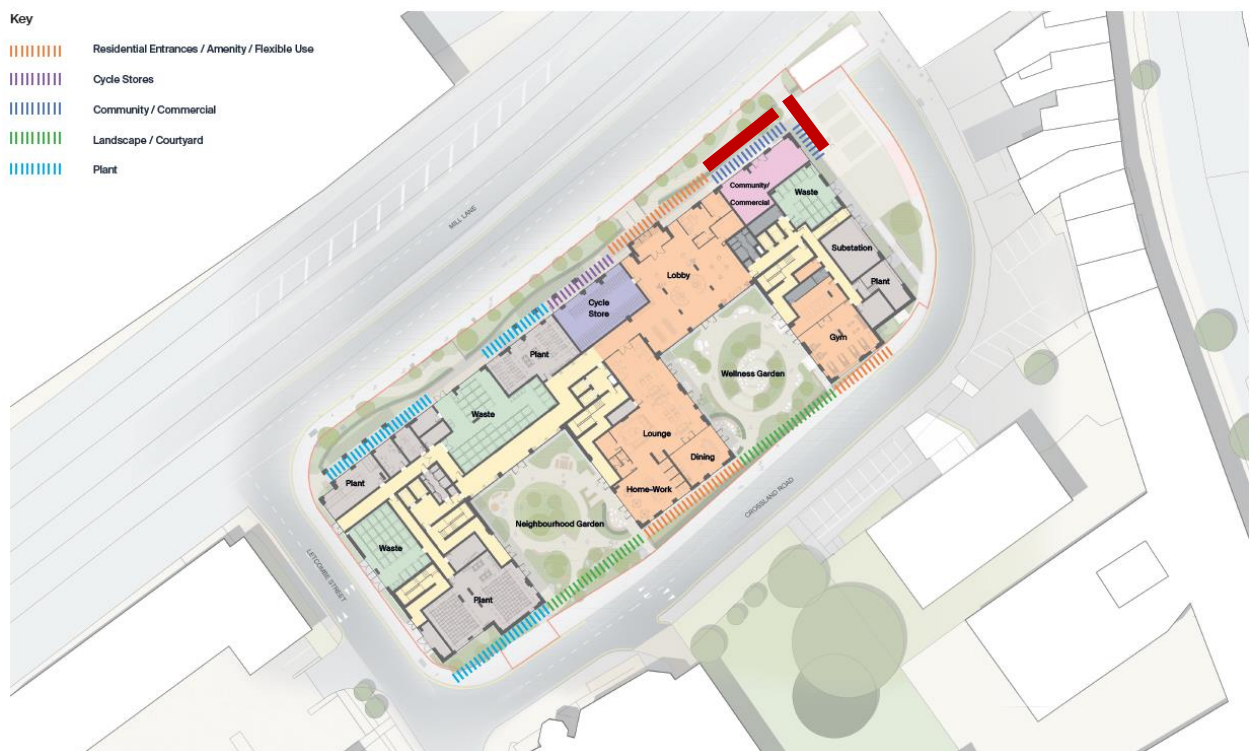
For instance, community/commercial use should be enlarged and connected to other public uses, such as the neighbouring garden. To do so, the proposed wellness garden for the residents should be a neighbouring garden to enhance the public use of the scheme. It is obvious that the proposed block in the middle would have harmful impacts on the setting of the listed Quaker's Meeting House. Surprisingly, no mitigation measures have been proposed for this impact. I highly recommend extending the neighbouring garden or natural features to the rear of this block so that it would reduce the impact of the scale and height of the proposed development as well as show a continuity of public use or a green approach to the scheme.



Proposed Ground Floor Plan- possible continuous public use and green approach is shown in red arrows



Proposed Ground Floor Uses (page 70, Design and Access Statement): weak and problematic relations that would result in harmful impact on the historic environment is shown in red arrows



Proposed Ground Floor Plan – Active Frontage: Community/Commercial use is emphasised by red lines – their percentage within the proposed scheme is very low



Proposed Ground Floor Plan – Access, Entrance and Servicing (page 74)

My following comments still apply:

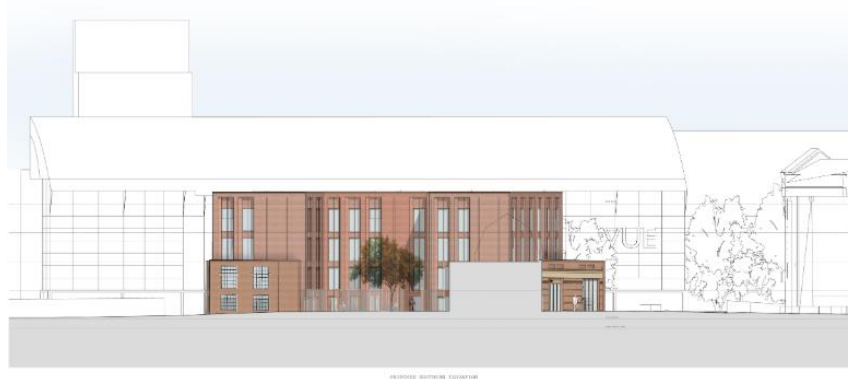
In terms of the impact on the settings of listed buildings, the proposed development would have a possible direct impact on No's 44 to 58 London Street and Reading Quaker Meeting House, and views of London Street and St Giles Church when approaching from Mill Lane junction.

Because the proposal lies within an area of human scale consisting of not only physical features of the conservation area but also scales of individual buildings and the modern residential developments to the south, it should also be a proportionate addition. However, with the maximum height of 11 storeys on one solid footprint, it still remains out of scale and bulky, not keeping with the character of the area. Given the positivity of revisions to the eastern part, I would like to conclude that this new residential-led development would have a minimal impact on the settings of listed buildings on London Street. There would be no impact on listed buildings on Church Street.

Please note that, the fact that the aimed number of units for this residential development is 200 does not mean that it should be reached by adding more storeys away from the conservation area. It should respect the existing built form, scale and height within this part of Reading. The replacement of the depot building should be contributing to the urban design characteristics of the modern residential area to the south as well.



Proposed North Elevation (page 111, Design and Access Statement) – This elevation would face the Oracle carpark. The tree line to the front and use of high quality materials would make the site more attractive than the existing appearance. However, in terms of height and scale, there would be a huge difference of height between the proposed blocks and neighbouring character areas. The block with the lowest height would have 7 storeys, next to it would be 4 storey new Central Club building (below) and further 2-3 storeys listed building and buildings of townscape merit within the conservation area. 11 storey block (the highest block) would also sit next to 4-6 storey hotel building. As such, in addition to the further mitigation measures for public uses and green areas, the height of the blocks should be reduced.



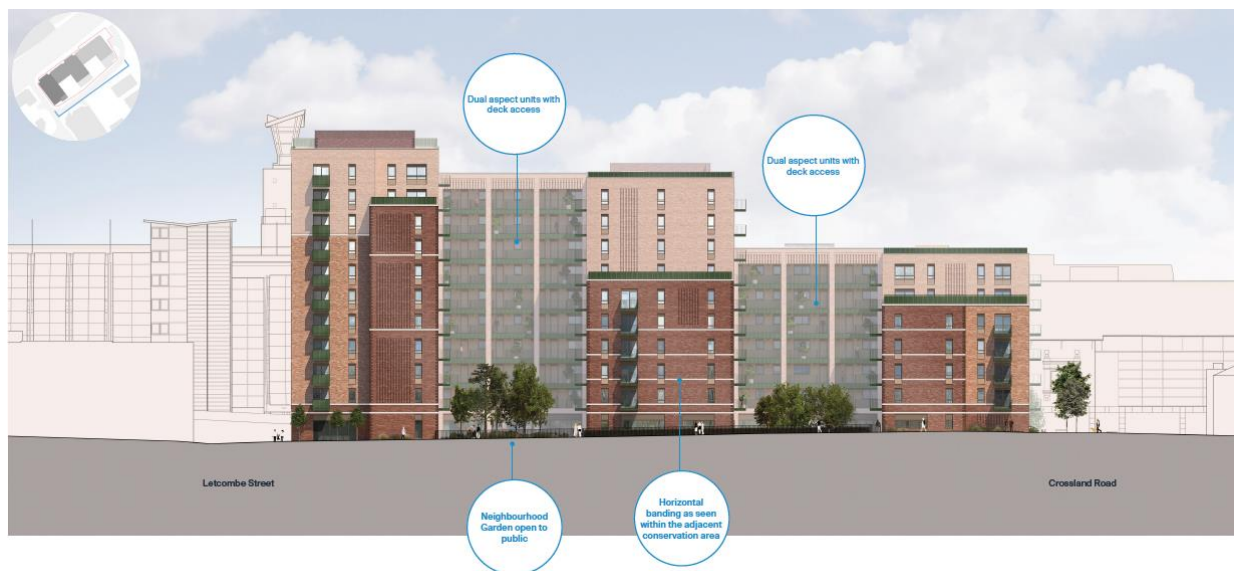
Approved Southern elevation under ref. 221364 for the Central Club, which has a horizontal emphasis similar to the Oracle but with limited height, representing the historic environment to the rear. The scale is appropriately designed.



The northern elevation of the Central Club with historic buildings on London Street is shown (from ref. 221364)



Proposed East Elevation (page 112, Design and Access Statement) – This elevation would be next to the Central Club



Proposed East Elevation (page 113, Design and Access Statement) – Scale of the proposal compared to the Oracle should be noted – larger than the Oracle



Proposed West Elevation (page 114, Design and Access Statement) – This elevation would face the modern hotel development whose related side elevations are visible in the photo below
- The proposed elevation shows the imposing and dominant characteristics of the proposal



Existing view of the depot – The proposal would be out of scale to the historic environment

Again, my previous comments (comments for the pre-app) still apply:

The proposed 3D illustrations shows that the proposal would block the open view from (burial ground) Reading Quaker Meeting House resulting in less than substantial harm at the moderate level to the setting of this listed building. My suggestion is further break the mass, not vertically but horizontally, to create an airflow, and open space and to reduce the bulky appearance of the proposed building at this location.

One of the most important effects of the scheme would be its visual impact on the appearance of the conservation area / London Street and on the landmark of the spire of St Giles Church. The revised proposal reduces both impacts and makes the spire partially visible, which is noted and appreciated. However, I would like to mention that the spire would not be visible when approaching from the north part of London Street; from the historic core of Reading, it would be seen from the IDR from the east, which is not related to the historical context of this medieval church. Therefore, the impact would be less than substantial at a low to moderate degree.

Another problem is the provided 3D models are (because of the nature of the 3D) all perspective views, which makes the proposal smaller. We need actual elevation drawings; some of them are submitted so that we can make a clear comparison and judgement. Impact on the legibility of the landmark of St Giles Church, in particular its spire, the continuity of open

characteristics of Quaker Meeting House and preserving or enhancing the character and appearance of the conservation area becomes crucial for this proposal.



Existing view showing the position of the church and landmark of southern Reading

I would like to confirm that I read the submitted Heritage, Townscape and Visual Assessment (BHTVIA) and Design and Access Statement. While reading the BHTVIA, I noted the following, so I would also like to add these:

- 'Legislation and Policy' section of the assessment includes conservation policies EN1, EN3, EN4, EN5 and EN6, but under 'Built Heritage' (page 2), there is no mention of EN3 – Conservation Areas
- I appreciate the Heritage Asset Plan on page 35. It is challenging to design a high-density residential development that would blend in the existing historic character and architectural features of the immediate area/settings of listed buildings, non-designated heritage assets and the conservation area and introduce a new attractive contemporary building(s) responding to today's needs with regards to the thresholds/location of the application site. Searching for a much smoother transition should be the aim.
- It is stated by the BHTVIA that the listed Reading Quaker Meeting House is 50m south of the site (on page 40). However, the listing covers the curtilage of this heritage asset that it is just on the other side of the road. So, this statement is incorrect. The listing description of this asset includes the burial ground, and the fact that the conservation area appraisal defines it as an important green space does not devalue this. So, the proposed development, due to its position, height and scale, would have a harmful impact on the Reading Quaker Meeting House. This is one of the most substantial impacts of the proposed scheme.
- Listed buildings on Church Street and north of London Street would also be negatively impacted by the proposed development. Historically, Church Street provides access to

the listed Church of St Giles, whose spire is a dominant feature for this conservation area and medieval Reading. The existing vertical gap between the depot building supports the visibility of Church of St Giles and the proposed development blocks that visual relationship without any mitigation measures. This is the second substantial impact. There is a visual assessment from a viewpoint of this impact. I'll comment on it below.

- I would like to remind that receptors are not static elements. The proposed development would be experienced by many people, especially when approaching the nodes and at the nodes/junctions. As such, I find the 16 representative views not enough. Therefore, View 1 and View 2 are very problematic. View 1 provides only one angle. View 2 is set back from the junction and partially blocked by the buildings on each side. Views 4A and 4B clearly show the harmful impact on the meeting house. View 9 reveals the unproportionate massing of the proposal. View 15 also shows considerable impacts of the proposed development.
- About the design, there are references made regarding the details of the existing architectural features such as traditional brick bonding and horizontal bands. I think these are all well-considered aspects of the proposed architecture. However, they are unable to outweigh the harm.



View of the Proposed Development (above) and Proposed Mill Lane Elevation (below), submitted in September 2025



To conclude, the proposed residential development, due to its position and setback distances, scale and height, would result in less than substantial harm at low degree on the setting of Reading Quaker Meeting House, listed buildings and BTMs on London Street and Church Street. Because of its height and massing, the proposal would still block some of the views of the listed Church of St Giles, causing less than substantial harm to the wider settings of the Church of St Giles and the conservation area at a low level. It is considered that the proposal would bring active public uses, spaces of well-designed landscaping and high-quality and contemporary architectural language that could lead to reaching heritage balance with regard to the public benefits.

Conservation response

- ☒ No objections
- ☐ No objections subject to conditions attached
- ☐ Clarification required
- ☐ Object

Contact details

Buju Can Cetin, Conservation Officer
Burcu.CanCetin@reading.gov.uk

0118 9373125