Heritage, Townscape and Visual Impact Assessment

St Mary's House, Nos. 66-68 St Mary's Butts
Reading RG1 2LG

April 2026

Turley
Heritage

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Our reference
01454

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1. Introduction

Purpose and Context

1.1 This Heritage, Townscape and Visual Impact Assessment report has been prepared by Turley Heritage and Townscape on behalf of Vincent Goldstein ('the Applicant') to assess the potential impacts of planning application development proposals for the refurbishment and extension of St Mary's House, Nos. 66—68 St Mary's Butts, Reading RG1 2LG ('the Site'), on the significance of built heritage and townscape character and related views / visual amenity. The Site is identified at **Figure s1.1-1.2** accordingly.

1.2 This report provides an appropriate and proportionate assessment to the local planning authority Reading Borough Council (RBC) regarding the likely impacts of the application proposals on the setting and overall heritage significance of the identified heritage assets and wider townscape / visual character for the area of the Site, and in order to meet the requirements of relevant legislation, national and local planning policy and application validation as follows best practice guidance / advice both nationally and locally.

1.3 A series of CGIs of the proposals have been prepared by Rutter Architects (as the appointed scheme architects) that also used to inform an assessment of visual and also related heritage / townscape impacts for this application. This is incorporated as part of this report accordingly.

Figure 1.1: Site location plan (red line)

1.4 For the purposes of the application, the Proposed Development is described as:

"Proposed change of use of first to third floors from office (Class E) to provide 41 serviced apartments (class C1). Addition of fourth floor to provide 6 serviced apartments (class C1)."

1.5 Full details of the planning application are described in the accompanying **Planning Statement**, prepared by Woolf Bond and the application drawings, CGIs and in particular the **Design and Access Statement (DAS)** prepared by Rutter Architects.

1.6 Importantly, the application proposals have been evolved through constructive pre-application engagement with officers at Reading Borough Council (RBC). Accordingly, the Planning Statement (prepared by Woolf Bond) provides an overview of the wider consultation process and feedback from these and other stakeholders on the application proposals at pre-application stage. A previous iteration of the scheme was submitted for pre-application engagement and consultation with RBC officers, and subsequently written advice was received on 6th June 2024. The preparation of this Heritage, Townscape and Visual Impact Assessment report for final application submission is one outcome of that positive process.

Figure 1.2: St Mary's House, Broad Street (the Site)

Site, Study Area and Approach

1.7 St Mary's House is a 1960s office building comprising basement, ground and three/part four storeys, located on the southeast corner of the junction of West Street (north), Broad Street (east), St Mary's Butts (south) and Oxford Road (west). It was recently reclad in brick slips at first and second floor and with metal cladding at third floor. The ground floor includes two commercial units, with the upper floors currently used as offices.

1.8 In this document the potential impacts of the application proposals on (i) heritage significance (including setting) in relation to built heritage assets, and (ii) townscape character, both with reference to potential visual impact are assessed.

1.9 The existing building is not statutorily or locally listed and is not located within a conservation area. However, it is located within the vicinity of a number of heritage assets, including the St Mary's Butts/Castle Street Conservation Area to the south (containing the Grade I listed Church of St Mary) and several statutorily and locally listed buildings along Broad Street to the east, Oxford Road to the west and West Street to the north, some of which have the potential to be affected by the Proposed Development, indirectly through a change within part of their respective settings.

1.10 The decision as to whether or not a heritage asset has been scoped into the following assessment was based on a consideration of each heritage asset's overall and individual heritage significance, the contribution of setting (and the Site) to this overall heritage significance and the nature and scale of the proposals. The listed building scoped into the following assessment are identified in **Table 1.1**. Given the dense urban context of the Site and the limited nature of the proposals, only those Grade II listed buildings and locally listed buildings within the immediate vicinity of the Site have been scoped into the assessment.

Table 1.1: Heritage Asset Scoped Into Assessment

Name	Type of Heritage Asset
St Mary's Butts/Castle Street	Conservation Area
Church of St Mary[1]	Grade I Listed Building
Greyfriars Church[2]	Grade I Listed Building
Nos. 67 and 68 Broad Street[3]	Grade II Listed Building
Congretional Church and Nos. 89 and 89A[4]	Grade II Listed Building
Nos. 85—88 Broad Street[5]	Locally Listed Building

1.11 The Site is also located within a town centre townscape context, comprised of a diverse and varied townscape of commercial buildings of various height and scale as well as age and architectural style, although the majority have active ground floor frontages. This is a product of the area's historical development, as outlined in ***Appendix 1,*** and in relation to the Site itself.

1.12 This report has been prepared following desk-based appraisal and research, a site visit and walkover, review of historic and existing maps, plans, aerial photography, planning history, townscape character assessments, and conservation area appraisals.

[1] https://historicengland.org.uk/listing/the-list/list-entry/1113573?section=official-list-entry
[2] https://historicengland.org.uk/listing/the-list/list-entry/1321952?section=official-list-entry
[3] https://historicengland.org.uk/listing/the-list/list-entry/1113405?section=official-list-entry
[4] https://historicengland.org.uk/listing/the-list/list-entry/1321954?section=official-list-entry
[5] https://www.reading.gov.uk/planning-and-building-control/heritage-and-conservation/conservation-areas-listed-buildings/locally-listed-buildings/

1.13 A summary of legislation, national and local planning policy, and guidance relevant to built heritage, townscape, and visual matters and the assessment of the application proposals is set out at ***Appendix 2*.**

1.14 It is to be noted that assessment of development impacts on the archaeological resource (i.e. below ground heritage assets) within the Site or surrounding area falls outside the remit of this report.

2. Built Heritage Assets, Heritage Significance and Townscape Context

Introduction

2.1 The relevant heritage assets, their significance and the relative contribution of the application Site, as an element of setting to that significance, is considered here. The townscape context to the Site comprises the St Mary's Butts/Castle Street Conservation Area to the south – in effect a discrete area of 'special' or higher value townscape, and the more widely the non-designated local townscape immediately surrounding the Site i.e., West Street (north), Broad Street (east) and Oxford Road (west).

Built Heritage Assets

2.2 The National Planning Policy Framework (NPPF) 2024 defines a heritage asset as:

"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)." [6]

2.3 Designated heritage assets are those which possess a level of heritage interest that justifies designation under relevant legislation and are then subject to particular procedures in planning decisions which involve them. These include listed buildings and conservation areas.

2.4 The NPPF requires that:

"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 is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."[7]

2.5 Paragraph 208 requires that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

[6] National Planning Policy Framework (NPPF) 2024 – Annex 2: Glossary
[7] National Planning Policy Framework (NPPF) 2024 – paragraph 207.

Heritage Significance

2.6 The NPPF defines the significance of a heritage asset as:

> *"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."* [8]

2.7 The NPPF defines the setting of a heritage asset as:

> *"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*[9]*."*

2.8 Historic England has published general guidance on the preparation of statements of heritage significance, and how the proper analysis of the significance of heritage assets should be used to inform an assessment of impacts on that significance as a result of proposed change / applications.[10]

2.9 Historic England also provides guidance[11] in respect of the setting and views of heritage assets, providing detail on understanding setting and views and the associated assessment of the impact of any changes. This presents a series of attributes of a setting which can be used to help assess its contribution to the significance of a heritage asset. These can comprise the asset's physical surroundings; the experience of the asset; and the asset's associative attributes.

2.10 Historic England also provides further guidance on their approach to making decisions and offering guidance about all aspects of England's historic environment.[12] This provides advice on how to assess the contribution of elements of a heritage asset, or within its setting, to its significance in terms of its "heritage values".

Conservation Areas

2.11 Conservation areas are designated based on their special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Guidance has been published in respect of conservation areas by Historic England, and this provides a framework for the appraisal and assessment of the special interest and significance of a conservation area.[13]

Listed Buildings

2.12 Listed buildings are designated heritage assets that have special architectural or historic interest that are included in a list compiled or approved by the Secretary of State. The principles of selection for listed buildings are published by the Department of Culture, Media and Sport and supported by Historic England's Listing Selection Guides for

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[8] MHCLG, National Planning policy Framework (NPPF) 2024 – Annex: Glossary
[9] NPPF 2024 - Annex 2: Glossary
[10] Historic England: Advice Note 12: Statements of Heritage Significance 2019
[11] Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, 2017 (2nd Ed.)
[12] English Heritage (now Historic England) Conservation Principles: Policies and Guidance, 2008
[13] Historic England, Advice Note 1, Conservation Area Designation, Appraisal and Management. 2019 (2nd Ed.)

differing building typologies.[14]

Locally Listed Buildings

2.13 The NPPF[15] identifies that heritage assets include not only designated heritage assets, but also assets that may be identified by the local planning authority during the plan making and/or application process (including through the Council-led process of local listing). These are described for the purposes as the NPPF as 'non-designated heritage assets' as a material planning consideration.

2.14 Reading Borough Council has established and maintains a List of Locally Important Buildings.[16] These buildings and structures, which do not meet the criteria for national listing, are nonetheless recognised as being significant to the heritage of the local area. Criteria for inclusion of locally listed assets can be found Appendix 2 of the *Reading Borough Local Plan* (Adopted November 2019).

Assessments of Heritage Significance and Townscape Setting

2.15 The assessment of heritage significance contained in **Table 2.1** is proportionate to the importance of the identified heritage assets. It is intended to provide a sufficient level of description to understand the likely impacts of future change through the Proposed Development, given its nature and extent. This assessment work is based on review of existing published information, desktop research and on-site visual survey.

[14] DCMS. Principles of Selection for Designating Buildings, 2018
[15] NPPF 2024 - Annex 2: Glossary
[16] https://www.reading.gov.uk/planning-and-building-control/heritage-and-conservation/conservation-areas-listed-buildings/locally-listed-buildings/

Table 2.1: Assessments of Heritage Significance (and Contribution of Setting)

Heritage Asset	Overall Heritage Significance	Contribution of Setting and the Site as an element of Setting
St Mary's Butts/Castle Street Conservation Area 	The conservation area's overall heritage significance derives from its historic layout, dating back to Saxon times, located at an important crossroads (Caste Street and St Mary's Butts/Bridge Street) beyond a river crossing. St Mary's Butts Church forms the medieval focal point of the conservation area, with the churchyard beside providing an important open space. St Mary's Church in Castle Street is another important landmark building. Many buildings within the conservation area possess architectural and historic interest, dating from the 16th century to the present. Collectively they are relatively consistent in scale and layout (including building line), though of various period styles. There are a variety of historic public houses and residential properties that showcase the evolution of this part of Reading over multiple centuries, encompassing key places of worship, commerce, and houses. The published Conservation Area Appraisal[17] provides a clear summary of the special interest (and overall	The north of the conservation area is dominated by commercial development on Broad Street, accessible via the northern end of St Mary's Butts and Chain Street. The Oracle Shopping Centre is located to the south east along Gun Street. The two key routes of St Mary's Butts/Bridge Street (north-South) and Castle Street/Gun Street (west to east) extend from the conservation area's boundaries. The northern side of Castle Street comprises the Magistrates Court and Police Station complex, with Civic Offices and the Hexagon behind, and the Broad Street Mall Shopping Centre further to the north east, together forming a cohesive 1970s redevelopment. The conservation area boundary encompasses a discrete area of historic townscape surrounded on three sides by post 1970s and later developments, and only to the north by the more historic Broad Street. However, this backs onto the conservation area with rear service yards and parking spaces, with key historic elements on the main street mostly out of view. Therefore, the conservation area's local setting generally makes neutral or negative contributions to its overall heritage significance.

[17] Reading Borough Council. St Mary's Butts/Castle Street Conservation Area Appraisal. 2007

Heritage Asset	Overall Heritage Significance	Contribution of Setting and the Site as an element of Setting
	heritage significance) of this designated area. Those features / aspects that are considered to justify designation are listed as: • Its position at the Saxon centre of Reading at a cross-roads of the main east-west and north-south routes through the town, just north of an original crossing point across the River Kennet, upon which river the town grew. • The Grade I listed Church of St Mary in St Mary's Butts, a Reading landmark, originally Norman, and mentioned in the Domesday Book, but now mostly Medieval in origin, which is the focal building of the Conservation Area. • St Mary's Churchyard, an important open space in the centre of town. • Other important landmark buildings including the Grade II* listed St Mary's Church in Castle Street. • The architectural and historic interest of the area's other buildings, with examples dating from the sixteenth century to the present day, but the majority of which show a coherence of scale within their various architectural styles. • The presence of some of the oldest surviving	St Mary's House is partially visible in views from the centre of the conservation area aligned with the historic route of St Mary's Butts, though mostly screened by adjacent historic and modern developments. As a modern building, it does not inform how the historic character of the conservation area is appreciated, and therefore makes a neutral contribution to its overall heritage significance.

Heritage Asset	Overall Heritage Significance	Contribution of Setting and the Site as an element of Setting
	buildings in Reading, including 3 existing public houses (“The Allied Arms”, “The Horn” and “The Sun”) dating from the 16th and 17th centuries, and the former “Shades” public house at 15 Gun Street dating from the 17th century. “The Sun” is also reputed to be on the site of the former Reading Gaol. • Important Grade II* listed buildings at 15 and 17 Castle Street (both 16th century), 19 Castle Street (early 18th century), 63 Castle Street (circa 1750) and the Church of St Mary, Castle Street (1798). • 35-37 St Mary’s Butts (“County Delicacies”) and 57 St Mary’s Butts (“The Allied Arms”), which also date from the 16th century. • The Queen Victoria Jubilee Fountain in St Mary’s Butts, a local landmark. • The Grade II* listed Holy Brook Culvert to the rear of numbers 1- 31(odd) Castle Street, plus the remainder of the Holy Brook which links the rear of the properties on the south side of the conservation area. A high percentage of listed buildings, listed individually and for their group value, dating from before 1875.	

Heritage Asset	Overall Heritage Significance	Contribution of Setting and the Site as an element of Setting
St Mary's Church (Grade I Listed Building) 	St Mary's Church derives significance from multiple phases of historic development, forming a key element of Reading's historic centre, dating from the Norman period, 13th, 14th, 16th, and 19th centuries, with a wide variety of decorative Gothic style architectural features and fabric. The church has architected interest derived from its many impressive structural and decorative details with masonry arches supported by buttresses, intricate window traceries, and a perpendicular tower with knapped flint set in a chequered pattern, displaying traditional skills and craftsmanship. The church continues to reflect Reading's religious, social and cultural life, providing an important physical record and expression of the long use of this site as a Christian place of worship.	The church is a key landmark in an enclosed townscape with many nearby historic residential and commercial buildings making a positive contribution to how the church's overall heritage significance is appreciated, as together they demonstrate historic social and religious life in this part of Reading. The Site to the north can be partially viewed in relation to the church from St Mary's Butts, though comprises a modern office and retail building mostly obscured by intermediary development aligning the street. The Site does not share any historical, functional or architectural connections with this listed building and is not an element of the wider setting that contributes to an understanding or appreciation of its particular heritage significance and special interest, or its relationship to its local setting (i.e., churchyard and surrounding historic buildings). In this context, the Site makes a neutral contribution to the listed building's overall heritage significance.
Greyfriars Church (Grade I Listed Building)	Greyfriars Church retains much of its original structure and has architectural interest as a rare example of a Franciscan church with medieval fabric remaining, tracery patterns and knapped flint. The church was restored in the late 19th century by a local architect,	Greyfriars Church is located at the far west of Friar Street on its north side, with adjacent buildings comprising a mix of historic and modern development. A roundabout with larger scale residential development beyond is situated to the west, with a smaller scale late

Heritage Asset	Overall Heritage Significance	Contribution of Setting and the Site as an element of Setting
	William Woodman, applying a well-considered, archaeological approach to his remodelling of the original church. The church has historic interest as the best-preserved Franciscan church in the country still operating. Between the 16th and 19th centuries, the building served as the Reading Guildhall, and was later used as a hospital and town gaol, before its restoration to a church, reflecting a range of important evolving uses over multiple centuries and changes in the perception and fortunes of the Roman Catholic Church in England.	19th century terrace along Sackville Street to north amidst further late 20th century buildings. Intact historic development on Friar Street and nearby roads informs the special interest of the church as shared fragments of the historic townscape, making isolated positive contributions towards its significance. However, the historic layout of development has been fundamentally altered to the west, with a number of lower quality late 20th century retail buildings to the east, having a negative to neutral impact on the listed building's significance. The listed church is intervisible with the Site to the south east in views along West Street and St Mary's Butts, though partially concealed by intermediary buildings aligning these roads. As modern commercial development, the Site does not inform how the special interest of the Greyfriars Church is appreciated, and therefore makes a neutral contribution to its overall heritage significance.
Nos. 67 and 68 Broad Street (Grade II Listed Building)	Nos. 67 and 68 Broad Street have architectural interest as an 1890s pair of shops, built in an Arts and Crafts style (in the manner of Norman Shaw), with ornate details and a fine composition to the street, aligned with the building's commercial functions. Grey and red	Nos. 67 and 68 Broad Street are situated on the north side of this historic shopping street, near a junction with St Mary's Butts and West Street. Surviving historic buildings along Broad Street make a positive contribution towards the listed building's significance

Heritage Asset	Overall Heritage Significance	Contribution of Setting and the Site as an element of Setting
	brick, terracotta bands, dentil strips, stucco decoration, and craved facia brackets showcase a variety of traditional building materials and craftsmanship. The shopfronts have been modernised, reducing this area's relative contribution to the building's significance. Nos. 67 and 68 Broad Street have historic interest as purpose-built shops reflecting the development of commercial Reading at the end of the 19th century and particularly the shopping trends along Broad Street in this period.	given their associated traditional commercial use and period styling. Though following the historic layout and scale of traditional retail development, there are also a number of unattractive modern buildings providing a mixed townscape quality. These modern examples of low-quality have a negative to neutral impact on the listed building's overall heritage significance. St Mary's House is located in close proximity to the south west of the listed building. It broadly aligns with the historic layout and scale of other buildings on this street, with a plain architectural composition of rectangular bays and neutral materials. Although interrupting a formerly historic townscape (now intermixed with many other modern buildings), it remains consistent with the commercial uses of the street and listed building, albeit not directly informing its special interest as later development. The Site's visual impact is further softened by intermediary trees along Broad Street in the summer months. In this context, the Site makes a neutral contribution to the listed building's overall heritage significance.
Congretional Church and Nos. 89 and 89A (Grade II Listed Building)	The listed building has architectural interest, built over two main phases. Nos. 89 and 89A Broad Street comprise an 1892 annex built in an eclectic classical	The 1892 annex addressing the street can be experienced along the length of Broad Street as part of a historic townscape, albeit interrupted by many

Heritage Asset	Overall Heritage Significance	Contribution of Setting and the Site as an element of Setting
	and Flemish inspired style of red brick, with stone dressings, and a central archway with moulded soffits, rustication, and a bolection above. An inscription in the shaped pediment reads "Broad Street Independent Chapel," and on the frieze below, "1662, 1892, 1800," denoting the ages of various parts of the Congregational Church. A fine tower to the front elevation is capped by an octagonal turret. The chapel behind was built in 1800 in a simpler style of plain brick with a hipped slate roof and arched windows. Preserved features evidence the church's use as a traditional place of worship, with the grand, late-19th century public architectural composition to Broad Street creating a prominent presence in the wider townscape. Historic interest derives from the building's former religious use in the local context over a long period, and its connection to the wider non-conformist movement in England.	modern buildings and elements. Surviving historic buildings inform the special interest of the listed building as broadly contemporaneous development in related architectural period styles, reflecting a combination of commercial and religious uses in this part of Reading. These make positive contributions towards the listed building's significance. The less attractive and low-quality modern buildings make either a neutral or negative contribution to the listed building's overall heritage significance as either neutral or distracting elements of townscape respectively. Rear yards and car parks generally make a neutral contribution to the listed building's overall heritage significance, given the extent of later alteration. The Site is located west of the listed building, also facing Broad Street, where there is a degree of intervisibility in shared views along its length, though reduced between the buildings themselves by a slight bend in the road providing additional screening. The rear eastern parts of the Site overlook the older chapel amidst rear yards behind Broad Street. However, the Site can be read as part of the general modern development and alteration to rear service areas backing the main shopping street, with limited architectural and townscape quality. As modern development, the Site does allow a greater appreciation of the listed building's special interest and,

Heritage Asset	Overall Heritage Significance	Contribution of Setting and the Site as an element of Setting
		in this context, makes a neutral contribution to its overall heritage significance.
Nos. 85—88 Broad Street (Locally Listed Building) 	Nos. 85—88 Broad Street comprises four shops with apartments above, designed in *c.* 1868 by T & W Brown, built of brick with shallow pitched slate roofs. Renovations were made in the 1930s and original shopfronts have been replaced with modern examples that have no architectural interest. Local architectural interest derives from retained decorative features to the first and second floors of the street façades, in period Victorian styles, evidencing the building's historic mixed commercial and residential use. Nos. 85—88 Broad Street are of local historic interest in reflecting 19th century commercial activity in this part of Broad Street.	Nos. 85—88 Broad Street are located on the south side of a busy shopping street with a mix of historic development and examples of modern infill. Historic buildings, mostly with shared traditional retail uses (or religious functions as in the case of the neighbouring Congretional Church to the east), inform Nos. 85—88 Broad Street's local interest as belonging to a broadly contemporary developmental phase with similar period architectural styling addressing the street. However, modern buildings of lower architectural quality make a neutral to negative contribution as either neutral or distracting elements of townscape respectively. The Site at St Mary's House is situated west of Nos. 85—88 Broad Street, also on the south side, where it can be experienced in relation to the locally listed building in local views along this important shopping route. However, visibility between the buildings themselves is reduced by a slight bend in the street. As modern development, the Site does allow a greater appreciation of the local interest of Nos. 85—88 Broad Street and, in this context, makes a neutral contribution to its overall heritage significance.

Site Context and Townscape Character

2.16 St Mary's House is a 1960s office building comprising basement, ground and three storeys, located on the southeast corner of the junction of West Street (north), Broad Street (east), St Mary's Butts (south) and Oxford Road (west). It was recently reclad in brick slips at first and second floor and with metal cladding at third floor. The basement and ground floor includes two retail units, whilst the upper floors are currently used as offices. The rear of the building is a private car park and associated bin stores.

2.17 Its location on the corner of the junction of these roads affords the existing building a prominent position within the local townscape, particularly in views from the west (Oxford Road) and north (West Street). Along these streets the longer western elevation of the building, as well as the canted corner, are most visible. Views are more constrained to the south (St Mary's Butts) due to the alignment of the street and to the east (Broad Street) due to the existing planting and the fact that the north elevation of the building is shorter than the others. The best views of the existing building are experienced from the adjacent roundabout, which is a well-used bus and vehicular route through the centre of Reading. The height of the existing building is closely aligned with the height of those opposite on the north side of Broad Street and the west side of St Mary's Butts. Building heights decrease to the south, towards St Mary's Church, and generally increase to the north, west and east of the town centre.

2.18 West Street (to the north) is a wide, busy vehicular route, with significant bus traffic and on-street parking on both sides of the road. It has a mixed townscape with the east side of the street mostly comprising grey or light brick buildings with red brick detailing, dating from the 19th and early 20th centuries. In contrast the western side of the road, particularly to the south, is dominated by larger-scale, later development. There are two statutorily listed building at the north-west corner of the Street which form a cluster with the Grade I listed Greyfriars Church (see above). Both sides of the street have active commercial frontages at ground floor, although some units to the western side are currently vacant.

2.19 Broad street (to the east) is a fully pedestrianised, busy street and the primary high street in Reading. It is generally wide, with narrow lanes branching off to the north and south, indicative of its medieval origins. There are a series of established planted trees along the centre of the street which, when in full leaf, hinder unobstructed views of the buildings, particularly within the vicinity of the Site. The townscape and roofscape is extremely varied in terms of the height, scale, materials, styles and age of the buildings, albeit a degree of cohesiveness is provided by the active commercial frontages at ground level across all buildings. The diversity in building stock adds to the street's vibrant character. There are several statutorily and locally listed buildings within the immediate vicinity of the Site (see above).

2.20 St Mary's Butts (to the south) is a wide, busy vehicular route, similar to West Street (to the north) and Oxford Road (to the west). There is on-street disabled parking on the eastern side of the street and several bus stops on its western side. The townscape is varied, with a finer, more diverse urban grain to the eastern side of the street. Here the buildings are generally of a smaller scale (ground plus two storeys) and demonstrates variety in terms of age, architectural style and materials. To the south end of the street,

several of these are statutorily listed and included within the boundary of the St Mary's Butts/Castle Street Conservation Area. In contrast, the west side of the street is dominated by the modern, large-scale massing of the Broad Street Mall.

2.21 Oxford Road (to the west) is a narrower, two lane road, compared with West Street(to the north) and St Mary's Butts (to the south). Whilst it still has significant bus traffic, it is generally a quieter street with a more enclosed character, primarily due to the greater massing of the townscape. Broad Street Mall occupies the southern side of the road and on the north side of the street is occupied by a similarly large-scale building, previously known as McIlroy's Building, which was built as a department store in 1903, although now much altered.

Representative Viewpoints and Visualisations

2.22 To recognise and assess the likely effects of the Proposed Development on the identified heritage assets and townscape character four "representative" townscape views have been identified, informed by desktop analysis and a site visit (**Figure 2.1**).

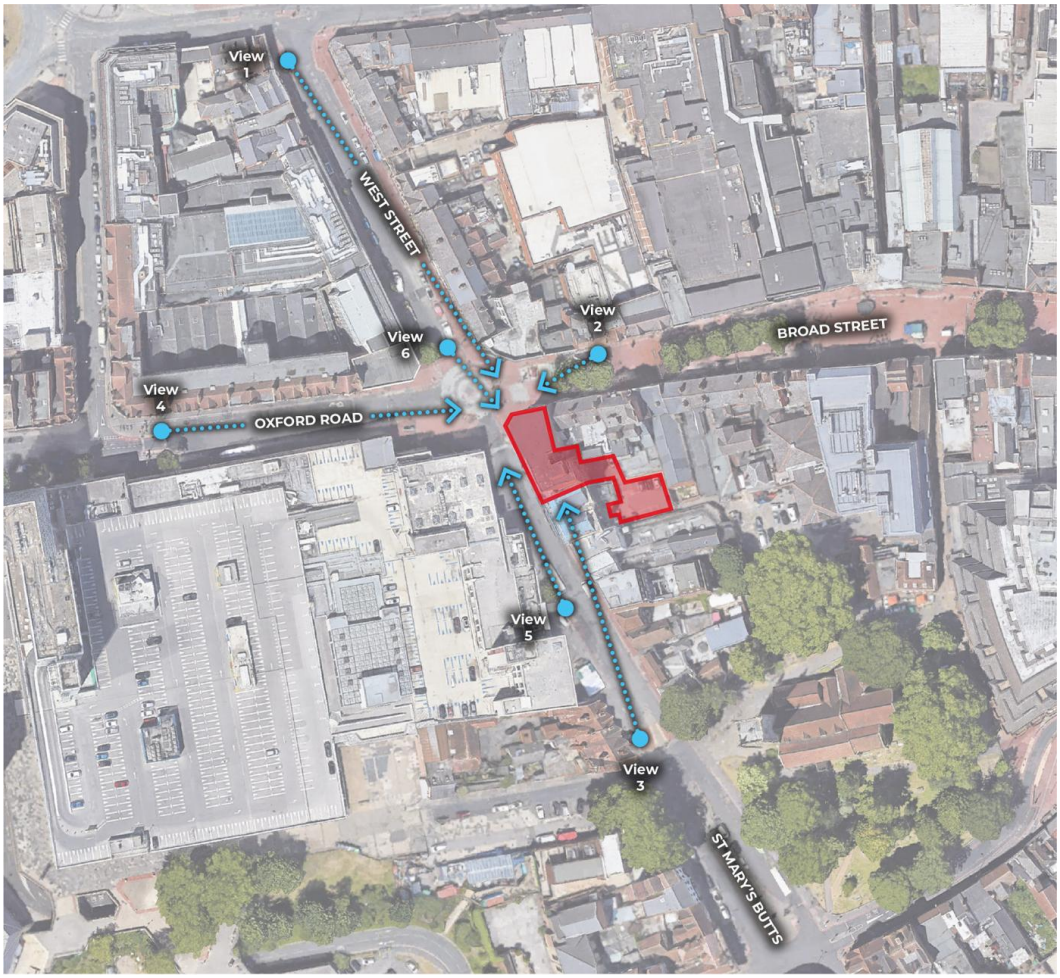

Figure 2.1: Viewpoint Plan (prepared by Rutter Architects)

2.23 The views prepared by Rutter Architects illustrate the visual experience from within the local townscape, comprising the nearby conservation area and the townscape context of the site itself. The views form the baseline against which built heritage, townscape

and visual effects of the application proposals are assessed.

- **View 1**: West Street, looking south
- **View 2**: Broad Street, looking west
- **View 3**: St Mary's Butts, looking north
- **View 4**: Oxford Road, looking east

2.24 Additional viewpoints and views (5 and 6) have also been selected by the architects for the purposes of further illustration of the design approach within the closer context of the Site and its building. These are included in the DAS accordingly.

3. Proposed Development and Impacts Assessment

Introduction

3.1 In accordance with the requirements of the NPPF 2024 (paragraphs 207-208), the significance of the identified built heritage assets have been proportionately described in **Section 2**, informed by a review of published sources, desktop research and on-site visual survey. The relevant heritage legislative, policy and guidance is also set out in full at ***Appendix 2*** of this report. This includes the statutory duties of the Planning (Listed Building and Conservation Areas) Act 1990, national policy set out in the NPPF 2024 and supported by the NPPG, and local policy and guidance in the historic environment. Together, these sections and appendices provide the appropriate context for consideration of the application proposals and heritage impacts, by the local planning authority.

Pre-Application Engagement and Consultation

3.2 The Planning Statement (prepared by Woolf Bond) provides an overview of the consultation process and feedback from stakeholders on the application proposals at pre-application stage. This has included engagement with officers at Reading Borough Council (RBC).

3.3 A previous iteration of the scheme was submitted for pre-application engagement and consultation. Written advice was received on 6th June 2024. In terms of design, the feedback stated:

"The addition of a fourth storey would extend the "top" section of the building upwards in a manner that would unbalance the existing building, even when taking into account the set ins from the edges of the site. This unbalanced appearance would be exacerbated by the increased step up from the buildings immediately adjacent to the application site, which are only three storeys in height. The rhythm of both Broad Street and St Mary's Butts does allow for fluctuation in heights between buildings, but these rarely exceed a single storey difference. Given the prominence of the site, and its high level of visibility from the surrounding streets, the proposal would have a significant impact on this part of Reading.

The amendments to the scheme reduced the bulk of the additional storey, bringing it in from the adjacent buildings to the east and south. Although this has reduced the impact of the proposals, the additional storey would still have an unacceptable impact on the character and appearance of the area. No detailed views or townscape analysis has been provided at this stage beyond the CGIs, so it is not possible to assess whether there is any mitigation of the effects of the extension.

The distance of the proposal from the Conservation Area and Listed Buildings is likely to ensure that there would not be any harm. However, this should be addressed in any submission to robustly demonstrate that this would be the case.

Increasing the scale of the building in the manner proposed would result in a building which would not sit comfortably within its context. It would be more dominant over its smaller, more traditional, neighbouring buildings, and be overbearing on this prominent corner. If an application is forthcoming and includes the additional storey, it is unlikely to succeed, given the above, but should heritage, views and townscape assessments be provided to justify its inclusion, they will be considered."

3.4 The final design of the scheme has responded to these proposals, as set out in the Design and Access Statement, prepared by Rutter Architects. The requirement set out in the feedback to provide a built heritage, views and townscape assessment is fulfilled through the preparation and submission of this report.

Summary of Proposed Development

3.5 The Proposed Development is described at application as:

"Proposed change of use of first to third floors from office (Class E) to provide 41 serviced apartments (class C1). Addition of fourth floor to provide 6 serviced apartments (class C1)."

3.6 The Design and Access Statement (DAS) prepared by Rutter Architects provides full details of the application proposals and how they have evolved in response to pre-application feedback. In summary, the application proposes to convert the existing office spaces within the upper floors of the building to provide a new, 41-room Apart Hotel, with associated amenity and back of house (**Figure 3.1**).

Figure 3.1: Computer Generated Image (CGI) of Proposed Development at it addresses its corner Site at meeting Broad Street and St Mary Butts

3.7 As part of this conversion, a new fourth floor, set back 1.2m from the existing facades is also proposed to provide the required density of rooms. This fourth floor has a mansard-style roof design (which is fairly prevalent within the local context) along street facing

elevations in order to reduce the perception of mass from the surrounding streets with a straight vertical face to the rear of the building. Dormers, with windows to match the dimensions of the existing fenestration, are proposed on the street facing elevations.

3.8 The proposals will also result in minimal change to the existing street façades but will improve the unattractive rear façade.

3.9 The DAS also includes four massing study views, prepared by Rutter Architects, which have been assessed in terms of the likely effects of the Proposed Development on built heritage and townscape / visual considerations.

Heritage Impact Assessment

3.10 There are no statutorily or locally listed buildings within the Site and it is not located within a conservation area. In this context, there will be no direct impacts on any identified heritage assets. The key matters for consideration in assessing the impact of the Proposed Development in terms of built heritage are the indirect impacts on the identified heritage assets through a change in a part of their settings. An assessment of the heritage impacts of the Proposed Development is included in **Table 3.1**.

Table 3.1: Heritage Impact Assessment

Heritage Asset	Heritage Impact Assessment
St Mary's Butts/Castle Street Conservation Area	As a modern building, the Site does not inform how the historic character of the conservation area is appreciated, and therefore makes a neutral contribution to its overall heritage significance. The proposed fourth floor extension will be partially visible in views from the south (View 3) from within the conservation area. However, in these views, the extension will be read as a recessive and appropriate 'top' to the existing building, that is in-keeping with the scale and character of the surrounding townscape context. It will not impede, undermine or obscure key elements of views towards the conservation area (View 1) and will not be a distracting element of views out of the conservation area. In this context, the proposals will sustain the conservation area's overall heritage significance.
Church of St Mary (Grade I Listed Building)	The Site does not share any historical, functional or architectural connections with this listed building and is not an element of the wider setting that contributes to an understanding or appreciation of its particular heritage significance and special interest, or relationship to its local setting (i.e., churchyard and surrounding historic buildings). In this context, the Site makes a neutral contribution to the listed building's overall heritage significance. The Site can be partially viewed in relation to the listed building along St Mary's Butts (View 3), although in these views the Site is experienced in the context of the mixed townscape along Broad Street. In these views, the proposed extension will be read as a

Heritage Asset	Heritage Impact Assessment
	recessive and appropriate 'top' to the existing building, that is in-keeping with the scale and character of the surrounding townscape context. It will not impede or obscure views of the church and will otherwise not undermine an appreciation of its overall heritage significance. In this context, the proposals will sustain the listed building's overall heritage significance.
Greyfriars Church (Grade I Listed Building)	As modern commercial development, the Site does not inform how the special interest of the Greyfriars Church is appreciated, and therefore makes a neutral contribution to its overall heritage significance. The Site is intervisible with the listed building (particularly the prominent eastern bellcote) in views along West Street (View 1) and St Mary's Butts (View 3), albeit experienced as part of the varied townscape context along Broad Street. The proposed extension will be read as a recessive and appropriate 'top' to the existing building, that is in-keeping with the scale and character of the surrounding townscape context. It will not impede or obscure views of the church and will not otherwise undermine an appreciation of its overall heritage significance. In this context, the proposals will sustain the listed building's overall heritage significance.
Nos. 67 and 68 Broad Street (Grade II Listed Building)	The Site is located within close proximity of these listed buildings. Whilst the Site is consistent with the commercial uses of the street and the listed building, it constitutes later development that does not directly inform or otherwise allow a greater understanding of its special interest. In this context, the Site makes a neutral contribution to the listed building's overall heritage significance. Due to a combination of the short elevation of the Site facing Broad Street and acute angle of the views along this street, the proposed extension will have limited visibility (View 2). It will read as a recessive 'top' to the existing building, that is in-keeping with the scale and character of the surrounding, mixed townscape context. It will not distract from or otherwise undermine an appreciation of the listed building's overall heritage significance. In this context, the proposals will sustain the listed building's overall heritage significance.
Congretional Church and Nos. 89 and 89A (Grade II Listed Building)	As modern development, the Site does allow a greater appreciation of the listed building's special interest and, in this context, makes a neutral contribution to its overall heritage significance. There is a degree of intervisibility between the Site and listed building, in shared views along Broad Street (View 1), though this is limited by the bend in the road providing an element of screening alongside the established trees (when in leaf). Due to a combination of the

Heritage Asset	Heritage Impact Assessment
	short elevation of the Site facing Broad Street and acute angle of the views along this street, the proposed extension will have limited visibility (View 2). It will read as a recessive 'top' to the existing building, that is in-keeping with the scale and character of the surrounding, mixed townscape context. It will not distract from or otherwise undermine an appreciation of the listed building's overall heritage significance. In this context, the proposals will sustain the listed building's overall heritage significance.
Nos. 85—88 Broad Street (Locally Listed Building)	As modern development, the Site does allow a greater appreciation of the local interest of Nos. 85—88 Broad Street and, in this context, makes a neutral contribution to its overall heritage significance. The Site can be experienced in relation to these locally listed building, in views along Broad Street albeit visibility is limited by the bend in the road providing an element of screening alongside the established trees (when in leaf). Due to a combination of the short elevation of the Site facing Broad Street and acute angle of the views along this street, the proposed extension will have limited visibility (View 2). It will read as a recessive 'top' to the existing building, that is in-keeping with the scale and character of the surrounding, mixed townscape context. It will not distract from or otherwise undermine an appreciation of the locally listed building's overall heritage significance. In this context, the proposals will sustain the locally listed building's overall heritage significance.

Review of Heritage Legislation, Planning Policy and Guidance

The Planning (Listed Buildings and Conservation Areas) Act 1990

3.11 In light of the relevant statutory duty of the Planning Act (s.72(1)), special attention has been paid to the desirability of preserving or enhancing the character and appearance of the St Mary's Butts/Castle Street Conservation Area. In addition, and in light of the relevant statutory duty of the Planning Act (s.66(1)), considerable weight and importance has been given to the requirements to pay special regard to the desirability of preserving the special interest of the identified statutorily listed buildings.

3.12 The proposals satisfy the requirements of these statutory duties in that they preserve both the character and appearance of the St Mary's Butts/Castle Street Conservation Area and the special interest and setting of the identified statutorily listed buildings in the surrounding area.

NPPF 2024 (and NPPG 2019)

3.13 In accordance with the requirements of paragraphs 207–208 of the NPPF, the significance (and, where relevant, any contribution made by setting to that significance) of the identified designated heritage assets has been described proportionately in **Section 2** of this report.

3.14 The proposals are in accordance with the key principles set out in paragraph 203, which encourages the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation as well as the desirability of new development making a positive contribution to local character and distinctiveness. The proposals will sustain the overall heritage significance of the identified heritage assets, and the detailed design and material choices have been informed by both the existing building and the historic context of the site.

3.15 Paragraph 212 requires that great weight should be given to conservation of designated heritage assets, where conservation is defined in Annex 2 of the NPPF as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. The proposals have been carefully considered and great weight given to the conservation of the identified designated heritage assets, as demonstrated by the pre-application process and associated design evolution.

3.16 Paragraph 216 requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing, application that directly or indirect affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Nos. 85—88 Broad Street, identified by Reading Borough Council as locally listed buildings, has been identified as having the potential to be affected by the proposals. The assessment concludes that the proposals would sustain the locally listed building's overall heritage significance such that no balanced judgement is required.

3.17 Paragraph 219 requires that local authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets, to enhance or better reveal their significance. It also states that proposals that preserve those elements of setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. The above assessment concludes that the proposals would preserve and sustain the elements of setting that make a positive contribution to the identified heritage assets.

3.18 As no harm to the overall heritage significance of the identified heritage assets has been identified paragraphs 213-215 and 220 do not apply.

Reading Borough Local Plan (November 2019)

3.19 It is demonstrated in this report that the proposals would conserve the overall heritage significance of both the St Mary's Butts/Castle Street Conservation Area as well as the identified statutorily and locally listed buildings. This is in accordance with Policies EN1, EN3, EN4, EN5 and EN6 of the adopted Reading Borough Local Plan (adopted November 2019).

Draft Reading Borough Local Plan Partial Update (October 2024)

3.20 As is it demonstrated in this report that the overall heritage significance of the identified heritage assets will be conserved, the proposals also accord with policies EN1, EN3, EN4, EN5 and EN6 of the partial update to the Draft Submission version of the Reading Local Plan Partial Update.

Townscape Impact Assessment

Introduction

3.21 This section provides a description of the impact of the application proposals on townscape character and as identified in **Section 2**. The assessment includes consideration of how the application proposals could affect the experience of visual amenity and local townscape character.

3.22 Paragraph 135 of the NPPF states that new development should, among other things, be visually attractive as a result of good architecture, sympathetic to local character and history – including surrounding built environment and setting and establish or maintain a strong sense of place.

3.23 In determining the likely effects of the application proposals a judgement is made regarding the design quality of the completed scheme. This is informed by the CGIs (see later in the Section) and review of the application information, specifically the DAS.

3.24 Where an effect on townscape character has been identified it is categorised as beneficial, none/neutral or adverse, based upon professional judgement taking account of the baseline condition and characteristics of townscape character. The proposed changes to the townscape within views due to the visibility of new built form can include both beneficial and adverse impacts and will be perceived differently by different individuals.

Townscape Assessment

3.25 The application proposals will change the use of the upper floors of the existing building from office to serviced apartments, including additional provision within a new fourth floor extension. This use, although different from existing, will contribute to and sustain the vitality and vibrancy of the primary shopping street of Broad Street and the surrounding town centre townscape context.

3.26 The proposed extension has been carefully considered to minimise its visual impact in views along the surrounding streets (Views 1-4). It will be stepped back 1.2m from the existing building line and the mansard-style design along street facing elevations reduces the perception of mass from the surrounding streets. Mansards are also fairly prevalent within the local context, reflecting and positively responding to the mixed townscape context and varied roofscape.

3.27 Due to a combination of road alignment and the form of the existing building (with a shorter elevation to the north and a longer elevation to the west), the greatest visibility of the proposed extension is from the north (View 1) and west (View 4). Views to the east (View 2) and south (View 3) are more constrained by intervening built form and the acute angle of the views. The building has the greatest visibility along Oxford Road (View 4), where the building is prominent in the background of the view, marking the corner with the junction of West Street, Broad Street and St Mary's Butts. In these views, the proposed extension will be read as a recessive and appropriate 'top' to the existing building, that is in-keeping with the scale and character of the surrounding townscape context. It will not distract from the existing key elements of these views.

3.28 In summary, the proposed change of use of the upper floors will contribute to and sustain the vitality and vibrancy of the town centre context. The proposed extension has been sensitively designed to be recessive and in-keeping with the existing scale and character of the surrounding townscape context and will not distract from the existing character of identified key views. In this context, the proposal will have a neutral impact on townscape character.

Review of relevant Planning Policy and Guidance

NPPF 2024 (and NPPG 2019)

3.29 The assessment of townscape effects reflects how the design of the Proposed Development meets the objectives of NPPF policies in respect of making effective use of land including the desirability of maintaining an area's prevailing character and setting (paragraph 129).

3.30 With regard, to well-designed and beautiful places, the application proposals will function well and add to the overall quality of the area over the lifetime of the development and be visually attractive as a result of good architecture (paragraph 135). As demonstrated in this assessment the proposals are sympathetic to local character and history, including the surrounding built environment and will optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (paragraph 135). Design quality was considered and tested throughout the evolution and assessment of the proposals (paragraph 137).

Reading Borough Local Plan (November 2019)

3.31 The proposed development is well designed and takes into account local design and planning guidance (139). In terms of design quality and appropriateness to context the proposals address Reading Borough Local Plan Policies CC7 and CR2 by maintaining the character and appearance of central Reading, responding positively to its local context and being visually attractive.

Draft Reading Borough Local Plan Partial Update (October 2024)

3.32 It is demonstrated in this report that the proposals are well designed and appropriate to their context. This is in accordance with policies CC7 and CR2 of the partial update to the Draft Submission version of the Reading Local Plan Partial Update.

Visual Impact Assessment

3.33 The supplementary visual impact assessment as part of our work also underpins and informs the assessments of potential effects of the application proposals on the significance (and setting) of built heritage assets and local townscape character. Historic England[18] note that the contribution of setting to the significance of a heritage asset is

[18] The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), Historic England, December 2017: 1.1 With regard to heritage significance views which contribute more to understanding a heritage asset can include:

- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
- those where town- or village-scape reveals views with unplanned or unintended beauty
- those with historical associations, including viewing points and the topography of battlefields

often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

3.34 As highlighted in Section 2 of this report, in order to recognise and assess the likely effects of the Proposed Development in their townscape and historic context four representative views have been identified, informed by desktop analysis and a site visit (**Figure 2.1 – Viewpoint Plan**). These views have been used by the appointed scheme architects to prepare a series of Computer Generated Images (CGIs) of the Proposed Development as part of the overall design and illustrative material for the application submission. And also to inform this visual impact assessment as part of our work.

3.35 It is important to bear in mind that none of the views are static, being kinetic and variable in nature when experienced within the townscape. The CGIs therefore provide approximate, two-dimensional representations of an otherwise complex scenic experience. Whilst the CGIs assist in assessment of likely impacts, the images are no substitute for the actual visual experience from a viewpoint or the associated experience by a visual receptor. It is essential when considering these views that the individual is aware of the viewing experience at each location, i.e., to be aware of traffic, noise, weather, the surrounding buildings, and any other similar matters. It is, therefore, recommended that this document be taken on site to fully appreciate the nature of the viewing experience in each viewpoint location.

- those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected
- those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant

View 1: West Street, looking south

Figure 3.2: View 1 - Existing (Photograph - reference only)

Existing

3.36 This viewpoint is located on West Street, near the junction with Friar Street, approximately 120m to the north-west of the Site. The view is experienced by road users and pedestrians along West Street and is within the vicinity of the Grade I listed Greyfriars Church.

3.37 The view looks south along West Street from the western pavement. The view is contained by the built form which lines both sides of the street. To the east, this built form comprises a row of brown brick terraces of three storeys and two bays with modern shop fronts at ground floor. Buildings of yellow brick with steep roofs and pointed gables interrupt the harmony of the terraces in the middle ground of the view. A modern large-scale office / commercial building lines the west side of the street. The built form beyond, at the junction with Oxford Road and St Mary's Butts, is screened by mature vegetation along this side of the street.

3.38 The west elevation of the Site is visible in the background of the view. The modern design of the elevation, of glazing and red brick, contrasts with the historic built form along the east side of West Street. The building is however of comparable scale and height and does not stand out in the view.

Figure 3.3: View 1 – Existing (Massing Study)

Figure 3.4: View 1 – Proposed Development

Proposed

3.39 The proposed extension will be visible within the background of this view, albeit partially screened by the intervening built form that encloses West Street on its west side. The mansard elements (and associated dormers) facing Broad Street and the turning corner into St Mary Butts will likely be discernible at this distance as a minor change to the existing roofscape against the sky backdrop. Overall these proposals will result in a very minor degree of change to this view, where the proposed development will read as a recessive and appropriate 'top' to the existing building, that is in-keeping with the prevailing roofline heights, and scale and character of the surrounding townscape context. It will not distract from an appreciation of the existing key elements of this view, such as the built enclosure of West Street and definition of the cross-roads that the Site addresses and turns as one corner.

View 2: Broad Street, looking west

Figure 3.5: View 2 – Existing (Photograph)

Existing

3.40 This viewpoint is located on Broad Street, near the junction with St Mary's Butt, Oxford Road and West Street, approximately 15m to the north-east of the Site. The view is experienced by pedestrians along the commercial street of Broad Street and is within the vicinity of the Grade II listed Nos. 67 and 68 Broad Street. It is also characteristic of the views along Broad Street in the vicinity of the Grade II listed Congretional Church and Nos. 89 and 89A as well as the locally listed Nos. 85—88 Broad Street.

3.41 The view looks across Broad Street, the principal commercial street within the historic centre of Road, from the north side of the street. The view is contained by the built form along the southern side of the street, which lines the foreground and middle ground of the view and prevents visibility to the built form beyond. This built form comprises residential buildings of three storeys and various age and materiality with shopfronts at ground floor and is partially screened by two mature trees planted in the centre of the pedestrian street. The northern elevation of the Site is partially visible in the middle ground of the view and is of comparable scale and height to the adjoining buildings, with a shop and café at ground floor. The upper storeys are screened by the mature trees (when in leaf) in the foreground of the view. The right-hand side (east) side of the view is contained by the commercial built form at the junction with St Mary's Butts. The imposing massing of Broad Street Mall fully contains the background of the view.

Figure 3.6: View 2 – Existing (Massing Study)

Figure 3.7: View 2 – Proposed Development

Proposed

3.42 The proposed extension will likely be visible within the middle-ground of this view, albeit partially screened by the mature trees in the foreground (when in leaf). The mansard elements (and associated dormers) facing Broad Street will have limited visibility due to the set back of this element 1.2m behind the existing building line. A small section of the vertical face of the fourth floor to the east elevation will be visible behind and above the existing roofline of the building adjacent to the Site to the east. The proposals will result in a minor degree of change to this view, particularly to the rear and west of the existing building. Visibility of this will be limited, particularly when the mature trees in the foreground of the view are in leaf. Even when visible, the proposed development will read as a recessive and appropriate 'top' to the existing building, that is in-keeping with the scale and character of the surrounding townscape context. It will not distract from

an appreciation of the existing key elements of this view, such as the built enclosure of Broad Street.

View 3: St Mary's Butts, looking north

Figure 3.8: View 3 – Existing (Photograph – reference only)

Existing

3.43 This viewpoint is located on St Mary's Butts, near the churchyard to the Grade I listed Church of St Mary within the St Mary's Butts and Castle Street Conservation Area, approximately 80m to the south of the Site. The view is experienced by road users and pedestrians along St Mary's Butts.

3.44 The view looks north along St Mary's Butts from the western pavement. The right-hand side (east) of the view is contained by the eclectic historic built form which lines this side of the street, comprising the Grade II listed Nos.55 and 55a St Mary's Butts and Allied Arms Inn. The western elevation of the Site is visible in the background, beyond the boundary of the conservation area. The building is recognisable by its distinctive red brick materiality and although it rises one storey above the adjoining buildings, it remains of comparable scale and height to the surrounding built form. The modern built form along the left-hand side (west) of the view does not form part of the conservation area. Beyond the junction between St Mary's Butt and Broad Street, the spire of the Grade I listed Greyfriars Church stands in the background of the view.

Figure 3.9: View 3 - Existing (Massing Study)

Figure 3.10: View 3 – Proposed

Proposed

3.45 The proposed extension will be visible within the middle-ground of this view, and as part of the varied character built form along the east side of St Mary Butts and then across the junction to continue as part of the enclosure to West Street further north. The mansard elements (and associated dormers) facing St Mary Butts (and also the turning corner into Broad Street) will be discernible as a minor change to the existing roofscape against the sky backdrop and will not appear overly prominent in this view. Overall these proposals will result in a minor degree of change to this view, where the proposed development will read as a recessive and appropriate 'top' to the existing building, that is in-keeping with the prevailing diversity of the roofscape and also roofline heights, and scale and character of the surrounding townscape context. It will not distract from an appreciation of the existing key elements of this view, such as the built enclosure of St

Mary Butts and also will serve to better define the cross-roads with Broad Street / Oxford Road by marking and turning this one corner Site as it addresses this key junction in the townscape.

View 4: Oxford Road, looking east

Figure 3.11: View 4 – Existing (Photograph)

Existing

3.46 This viewpoint is located on Oxford Road, near the junction with Cheapside, approximately 110m to the west of the Site. The view is experienced by road users and pedestrians along Oxford Road.

3.47 The view looks east along Oxford Road from the northern pavement. Both sides of the view are contained by the commercial built form along the road. To the north, this comprises a large historic terrace row of four storeys with attic, altered with modern shop fronts at ground floor and offices at first floor. The two-storey Broad Street Mall extends along the southern side of the road. The Site is prominent in the background of the view, marking the corner with the junction of West Street, Broad Street and St Mary's Butts. This viewpoint offers an unobstructed view of all elevations of the building. The built form along Broad Street is screened by mature vegetation.

Figure 3.12: View 4 - Existing (Massing Study)

Figure 3.13: View 4 – Proposed

Proposed

3.48 The proposed extension will be visible within the middle-ground of this view, and as part of the varied character built form along and as enclosure to these local streets and the key cross-roads at this point in the townscape. The mansard elements (and associated dormers) facing both Broad Street and St Mary Butts at this corner will be discernible as a minor change to the existing roofscape against the sky backdrop and will not appear overly prominent in this view. Overall these proposals will result in a minor degree of change to this view, where the proposed development will read as a recessive and appropriate 'top' to the existing building, that is in-keeping with the prevailing diversity of the roofscape and also roofline heights, and scale and character of the surrounding townscape context. It will not distract from an appreciation of the existing key elements of this view, such as the built enclosure of Oxford Road and its continuation along Broad

Street eastwards and also will serve to better define the cross-roads by marking and turning this one corner Site as it addresses this key junction.

4. Conclusions

4.1 This Heritage, Townscape and Visual Impact Assessment reports the likely effects of the Proposed Development on the significance (and setting) or bult heritage assets and local townscape character and views / visual amenity for the Site and this application.

4.2 This assessment is informed by desktop and field study, including a review of relevant built heritage and townscape designations and views; relevant legislation, national and local planning policy; relevant published sources; and baseline assessment of the value and importance of the relevant built heritage and townscape context. That baseline work informed the assessment of potential impact of the Proposed Development on the relevant heritage assets and townscape context, including a consideration of four identified representative views.

4.3 **Section 2** of this Statement identified the relevant heritage assets and their significance, as well as the Site's townscape context, which have the potential to be affected by the Proposed Development. The nature and extent of the Proposed Development is summarised in **Section 3** (see the DAS for associated detail).

Heritage and Townscape Impact

4.4 The proportionate assessment in **Section 3** identifies and provides an assessment of the relative impacts of the Proposed Development on built heritage assets and the townscape / visual character of the local area surrounding the Site. Four representative views have also been identified and assessed in order to support the assessment of heritage setting and townscape context.

4.5 It is concluded that:

- The application proposals have been designed to respond positively to the surrounding townscape in terms of height, form and materials.
- The overall heritage significance of the St Mary's Butts/Castle Street Conservation Area, as well as that of the identified statutorily and locally listed buildings, will be preserved by the Proposed Development, which will have no adverse impacts.
- The proposed change of use of the upper floors will contribute to and sustain the vitality and vibrancy of the town centre context. The proposed extension has been sensitively designed to be recessive and in-keeping with the existing scale and character of the surrounding townscape context, on which it will have a neutral impact.
- The visual assessment demonstrates that the proposed increase in height of the Proposed Development, relative to existing, will be in-keeping with the existing, varied townscape context of the centre of Reading. And again have no adverse visual impacts by our assessment.

Appendix 1: Historical Development of Reading Town and the Site

Reading Town

1. The settlement of Reading was established at the lowest point of the River Kennet, where it could be forded. The original crossing place was at today's Bridge Street, and here the roads from Oxford, Southampton, Bath and London converged. Reading's location on the Kennet, near its junction with the Thames, means that it is in a favourable position for waterborne trade as well as passing traffic on the roads. The foundation of Reading Abbey by Henry I also fostered the growth of the town. This was located in the area of today's Forbury, transferred to the Benedictine order in the mid-13th century, and grew steadily so that by the mid-14th century it had become one of the richest abbeys in the country. Its royal patronage made it one of the main pilgrimage sites in England, and inevitably a population grew up around it which made a living from the many people visiting the town.

2. In its earliest years, the principal route through Reading followed Southampton Street, Bridge Street and St Mary's Butts in a north-south direction, past St Mary's Church and the original nucleus of the town. As the influence of the Abbey grew, the route along London Street and Duke Street to the Market Place outside St Laurence's Church became more popular and shifted the focus of the town eastwards. It is this 12th century route which forms the backbone of the Market Place / London Street Conservation Area. Reading Abbey was largely destroyed during the Dissolution of the Monasteries, after which its building materials were steadily quarried for reuse elsewhere in the town. Despite the loss of this key draw to the town, Reading continued to thrive on a range of trades and industries, including cloth and leather manufacture, and silk weaving.

3. One of the earliest detailed modern maps of Reading shows the town arranged in a broadly triangular shape to either side of the River Kennet. Friar Street formed one side of the triangle; with Southampton Street, Bridge Street and St Mary's Butts forming a second side, and London Street, Duke Street and Market Place the third. A church is located at each apex: St Laurence's, St Mary's and St Giles'. An extract of John Rocque's 18th century map is included at **Figure 4.1**.

4. The early established triangular settlement pattern remained legible through the 18th century, although some additional linear development had expanded westwards along Castle Hill and Bath Road, and also eastwards along London Road. Whilst the town itself remained relatively contained, its role and reputation grew in importance when work began in the early-18th century to make the both the Rivers Kennet and Avon navigable. This encouraged further trade and connection with Bath and Bristol in the west, and also London in the east. Construction began on a canal to connect the two rivers in 1794, and this was completed in 1810. This created a continuous waterborne route between Bristol and London, passing through Reading, and also highlighted Reading's importance commercially and industrially.

5. The town filled out over the early decades of the 19th century. The medieval linear development along the three main routes again expanded outwards with new streets and development, and as a result of the improvements in transport and infrastructure in the town, and its status on the key transport route of the Kennet and Avon Canal. The Great Western Railway opened through the town in 1840, and as with the canal, this catalysed further growth and expansion. Major industries now began to be established

in the town, including the biscuit manufacturers Huntley and Palmers, which by 1900 was the largest biscuit manufacturer in the world and employed over 5,000 people in the town. **Figure 4.2** includes an extract of the 1877 Ordnance Survey map held by Berkshire Archives.

Figure 4.1: Extract John Rocque's Map of Reading dated 1761[19]

6. Into the 20th century Reading grown to become much denser and built-up, so that the early triangular street pattern had been both in-filled and surrounded by further streets of housing and industry. However, the medieval street pattern of London Street, Duke Street and Market Place remained legible, with its fine-grained street pattern of narrow-fronted plots, up to the Second World War. It was during and then immediately after this war that the greatest change occurred to the townscape. Extensive enemy bombing

[19] Berkshire County Record Office

during the war necessitated the redevelopment of many central sites, albeit joined in the post-war period by even more comprehensive development plans for the future town that impacts much of the historic core. Larger-scale redevelopment has also occurred along the waterside and close to the new Inner Distribution Road (IDR), which was constructed between 1969 and the late-1980s east to west to the southern edge of the town centre. It is this road, more than any other late-20th century development, which has impacted upon the character of the historic core and the town as a whole. Just south of the river / canal this post-war intervention involved the demolition of elements of Reading's historic core and building stock.

Figure 4.2: Extract of Ordnance Survey (OS) map, surveyed 1875, published 1879 (approximate area of the Site identified by a red circle)[20]

The Site

7. For the Site itself, the historically established street pattern of the key east-west route of Broad Street / Oxford Road and roughly north-south West Street / St Mary Butts as they meet and cross near to the Site remains legible as found today. The ancient foundation of St Mary's Church within its churchyard also remains a key feature of the townscape locally (now designated as a listed building and also part of the St Mary Butts / Castle Street Conservation Area) further to the south of the Site. Although the general street pattern and urban blocks of this part of the town centre can still be read, Broad Street Mall is another example of the more comprehensive approach to redevelopment in the post-war period with the introduction of a larger scale and height of built form,

[20] National Library of Scotland - https://maps.nls.uk/view/104197876

erosion of the earlier finer grain townscape and also new set back of the street edge directly opposite the Site to its west.

8. The progressive development of the amalgamation of older plots along these street and the replacement development and or alteration / extension of older buildings has also changed the townscape character through the post-war period. The resultant townscape now comprises a mix of historic and also more modern buildings within this older street pattern. This includes the Site building itself, which is a 1960s commercial building (albeit more recently re-clad) of no particular historic or architectural interest.

Figure 4.3: Extract of GoogleEarth aerial photography 2024 (approximate area of the Site identified by a red circle)

Appendix 2: Relevant Heritage and Townscape Legislation and Planning Policy / Guidance

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990
Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a general duty as respects listed buildings in the exercise of planning functions. Subsection (1) provides that:

> *"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*

It is also a statutory duty for the decision maker when determining applications for planning permission within conservation areas that (Section 72):

> *"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."*

The setting of a conservation area is not however protected by statute.

Case law[21] has confirmed that Parliament's intention in enacting section 66(1) of the 1990 Act was that decision-makers should give "considerable importance and weight" to the desirability of preserving the setting of listed buildings, where "preserve" means to "to do no harm" This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by national planning policy. Case law has confirmed that this weight can also be applied to the statutory tests in respect of conservation areas[22]. The Secretary of State has confirmed[23] that 'considerable importance and weight' is not synonymous with 'overriding importance and weight'. Importantly, the meaning of preservation in this context, as informed by case law, is taken to be the avoidance of harm.

National Policy

National Planning Policy Framework 2024
The updated National Planning Policy Framework (NPPF) was introduced 20th December 2024 as the full statement of Government planning policies covering all aspects of the planning process.

Chapter 12 of the Framework outlines Government's guidance on achieving well-designed places.

Paragraph 131 establishes that for the Government the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and

[21] Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) English Heritage (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014
[22] The Forge Field Society v Sevenoaks District Council [2014] EWHC 1895 (Admin); North Norfolk District Council v Secretary of State for Communities and Local Government [2014] EWHC 279 (Admin)
[23] APP/H1705/A/13/2205929

work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.

Paragraph 135 sets out that planning policies and decisions should ensure that developments:

> *" a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
>
> *b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
>
> *c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
>
> *d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
>
> *e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
>
> *f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users46; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

Paragraph 137 establishes that design quality should be considered throughout the evolution and assessment of individual proposals.

Paragraph 139 requires that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, because of changes being made to the permitted scheme.

Paragraph 139 also sets out that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Paragraph 187 of the NPPF goes on to say that the planning system should 'contribute to and enhance the natural and local environment' by a number of things including:

> *"a) protecting and enhancing valued landscape … (in a manner commensurate with their statutory status or identified quality in the development plan);*

b) recognising the intrinsic character and beauty of the countryside …"

Paragraph 188 states that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Chapter 16 of the NPPF outlines the Government's guidance regarding conserving and enhancing the historic environment.

The glossary of the Framework (**Annex 2**) defines conservation as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Paragraph 207 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance.

Paragraph 208 requires local planning authorities to also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 210 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 212 further requires that local planning authorities should give great weight to the asset's conservation when considering the impact on a proposed development on the significance of a designated heritage asset. The more important the heritage asset, the greater the weight should be.

Paragraph 213 specifies that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification.

Paragraph 214 advises local planning authorities to refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied.

Paragraph 215 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use.

Paragraph 216 relates to the effects of an application on the significance of non-designated heritage assets with a judgement required having regard to the scale of any harm or loss and the significance of the asset to be taken into account in determining the application.

Paragraph 219 states that proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance), should be treated favourably. It outlines that local planning authorities should also look for opportunities for new development within conservations areas and the setting of heritage assets to enhance or better reveal their significance.

Paragraph 220 notes that not all elements of e.g. a conservation area will necessarily relate to its significance (whilst loss of a positively contributing element should be treated as either substantial or less than substantial harm, taking account of relative significance and contribution as a whole)

Local Policy – The Development Plan

The Development Plan for this local planning authority area comprises the Reading Borough Local Plan (2019) and other published SPD and SPG. These documents provide local guidance with regard to development affecting heritage assets, townscape character and visual amenity, and should accord with the statutory duties and the general principles outlined in the NPPF.

Reading Borough Local Plan 2019[24]

The Reading Borough Local Plan was adopted on 4 November 2019. This document sets out local planning policies for development in Reading up to 2036 and are the main considerations in deciding planning applications. The Local Plan replaces previous development plans - the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document - which no longer apply. The relevant Local Plan policies for the development of the Site and built heritage, townscape and visual matters are set out below.

Policy EN1 (Protection and Enhancement of the Historic Environment)

Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Scheduled Monuments;*
- *Historic parks and gardens; and*
- *Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.*

All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the

[24] Reading Borough Council (2019) Reading Borough Local Plan

area in which they are located. 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 which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.

Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.

Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

Policy EN3 (Enhancement of Conservation Areas)

The special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. 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.*

Where a Conservation Area Appraisal and Management Plan has been adopted for a particular Conservation Area, this will be a material consideration in determining applications for development.

Policy EN4 (Locally Important Heritage Assets)

Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset.

Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. Where it is accepted by the Local Planning Authority that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality.

Policy EN5 (Protection of Significant Views with Heritage Interest)

New development should not harm and where possible should make a positive contribution to views of acknowledged historical significance. The following views merit special protection:

1. View from McIlroy Park towards Chazey Barn Farm, the Thames Meadow and the Chilterns escarpment

2. View northwards down Southampton St from Whitley St towards St Giles Church, St Mary's Church and Greyfriars Church

3. View upstream from Caversham Bridge

4. View northwards down Russell St towards the Church of the Holy Trinity

5. View over Alexandra Road Conservation Area toward the Chilterns escarpment

6. View southwards down St Annes Rd towards Downshire Square

7. View of St Annes Church Tower from the west

8. View towards Caversham Park House from the A329(M), railway and surrounding streets

9. View southwards along tree-lined Coley Avenue

Policy EN6 (New Development in an Historic Context)

In areas characterised by heritage assets, the historic environment will inform and shape new development. 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.

Policy CC7 (Design and the Public Realm)

All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The various components of development form, including: -

- *Layout: urban structure and urban grain;*
- *Landscape;*
- *Density and mix;*
- *Scale: height and massing; and*
- *Architectural detail and materials*

will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives: -

- *Character - a place with its own identity and sense of place*
- *Continuity and enclosure*
- *Quality of the public realm and provision of green infrastructure and landscaping*
- *Ease of movement and permeability*
- *Legibility - clear image and easy to understand*
- *Adaptability – capable of adaptation over time*
- *Diversity – meets a wide range of needs.*

Developments will also be assessed to ensure that they: -

- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*

- *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*

- *Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*

- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*

Applications for major developments, or other relevant developments, should be accompanied by a design and access statement that deals with all the above matters.

Policy CR2 (Design in Central Reading)

Applications for development within Central Reading should demonstrate the following attributes:

a. Development will build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area;

b. Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;

c. Development should consider and, where possible, include ways of providing green infrastructure designed into the development, for instance through roof gardens, green walls and green roofs, to enhance the otherwise very urban environment;

d. The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;

e. Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety; and

f. Development should be designed with consideration of adjacent development sites, and should not prevent or cause unreasonable burdens on the future development of those sites.

Draft Reading Borough Local Plan Partial Update (October 2024)

Reading Borough Council are currently consulting on a Partial Update to their Local Plan. The relevant Local Plan policies for the development of the Site and built heritage, townscape and visual matters are set out below.

Policy EN1 (Protection and Enhancement of the Historic Environment) (Strategic Policy)

Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Scheduled Monuments;*
- *Historic parks and gardens; and*
- *Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.*

All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. 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 which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.

Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.

Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

Policy EN3 (Enhancement of Conservation Areas)

The special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive

contribution to local character and distinctiveness. 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.*

Where a Conservation Area Appraisal and Management Plan has been adopted for a particular Conservation Area, this will be a material consideration in determining applications for development.

Policy EN4 (Locally Important Heritage Assets)

Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset.

Planning permission may be granted in cases where a proposal could result in substantial harm to or loss of a locally important heritage asset only where it can be demonstrated that substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where it is accepted by the decision-maker that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality.

Policy EN5 (Protection of Significant Views with Heritage Interest)

New development should not harm and where possible should make a positive contribution to views of acknowledged historical significance. The following views merit special protection:

1. View from McIlroy Park towards Chazey Farm Barn, the Thames Meadow and the Chilterns escarpment

2. View northwards down Southampton St from Whitley St towards St Giles Church, St Mary's Church and Greyfriars Church

3. View upstream from Caversham Bridge

4. View northwards down Russell St towards the Church of the Holy Trinity

5. View over Alexandra Road Conservation Area toward the Chilterns escarpment

6. View southwards down St Annes Rd towards Downshire Square

7. View of St Annes Church Tower from the west

8. View towards Caversham Park House from the A329(M), railway and surrounding streets

9. View southwards along tree-lined Coley Avenue

Policy EN6 (New Development in an Historic Context)

In areas characterised by heritage assets, the historic environment will inform and shape new development. 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.

Policy CC7 (Design and the Public Realm)

All development must be of high-quality design, employing characteristics to create, maintain and enhance physical character, nurture and sustain a sense of community and positively address environmental issued affecting the climate. Proposals will be assessed to ensure that the development makes a positive contribution within the following characteristics:

- *Context – enhances the surroundings based on a sound understanding of the features of the site and its surroundings and is responsive to local history, culture and heritage.*

- *Identity – is attractive and distinctive, with a positive and coherent identity that suits the context, its history, how we live today and how we are likely to live in the future. Proposals should be visually attractive to occupants and other users with a strong focus on high-quality architecture.*

- *Built Form – exhibits a coherent pattern of development that is compact and walkable, accessible by public transport, services and facilities with distinctive and legible streets and other spaces that are easy to navigate, safe and accessible. Development should employ appropriate scale, architectural detail and materials. Streets should be tree-lined and provide high-quality public realm.*

- *Movement – is accessible and easy to move around for all and especially vulnerable users, taking account of the diverse needs of its users and providing a genuine choice of sustainable transport modes. Development should promote activity and social interaction.*

- *Nature – enhances and optimises nature by integrating existing and new natural features into a multifunctional network to support quality of place, biodiversity, water management and climate change mitigation. Schemes should retain existing trees and aim to establish new trees.*

- *Public spaces – creates safe, social and inclusive public spaces and streets.*

- *Uses – ensures uses are mixed and integrated, including a range of local services and facilities to support daily life and a mix of housing and tenure types.*

- *Homes and buildings – creates homes and buildings which function well and are visually attractive, healthy, safe and sustainable with good quality internal and external environments to promote health and well-being.*

- *Resources – reflects efficient use of resources and resilience for the future by reducing resource requirements for land, energy and water and being adaptable over time by reducing the need for development.*

- *Lifespan – ensures development is made to last, robust and easy to use and look after, adapting to users' changing needs and evolving technologies.*

Applications for major developments should be accompanied by a design and access statement that deals with all matters listed above and may be expected to improve and maintain the public realm of the surrounding area. For minor applications, the issues above should be addressed within a planning statement.

In instances where on-site provision is not sought, applicants may be required to make financial contributions towards public realm improvements.

Policy CR2 (Design in Central Reading)

Applications for development within Central Reading should demonstrate the following attributes:

a. Development will build on and attempt to re-establish a grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area;

b. Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;

c. Development should provide green infrastructure and design for biodiversity net gain, for instance through roof gardens, green walls and green roofs, to enhance the otherwise very urban environment;

d. The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;

e. Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety; and

f. Development should be designed with consideration of adjacent development sites, and should not prevent or cause unreasonable burdens on the future development of those sites.

In cases where conflicts arise between the elements listed above, measures which bring the greatest public benefit will be prioritised.

Other Material Considerations

European Landscape Convention

The European Landscape Convention (ELC) provides a basis for closer co-operation on landscape issues across Europe and was signed and ratified in the UK. This recognition to landscape matters raises the profile and the ELC has been set out to improve approaches to the planning, management and protection of landscapes throughout Europe.

The ELC defines landscape as "*an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*" and it includes **townscape**, as well as all forms of rural landscape.

National Planning Policy Guidance (NPPG)

National Planning Practice Guidance (PPG) was first issued by the Government in 2014 as a web based resource and living document. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF. The most recent updates date from 2019.

Public benefits are defined in PPG as anything that delivers economic, social or environmental

progress as described in the Framework (paragraph 7)[25].NPPG confirms that public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be of private benefit. It is noted that benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Public benefits may include heritage benefits[26], such as:

- *"Sustaining or enhancing the significance of a heritage asset and the contribution of its setting;*
- *Reducing or removing risks to a heritage asset; and*
- *Securing the optimum viable use of a heritage asset in support of its long term conservation."*

National Design Guide: Planning practice guidance for beautiful, enduring and successful places 2019

The government has published the National Design Guidance to underpin the NPPF design policies. The purpose of this document is to set out how well-designed places are recognised, and to assist policy makers, decision takers and applicants preparing applications.

The document outlines and illustrates the Government's priorities for well-designed places in the form of ten characteristics which form an overarching framework.

"Well-designed places have individual characteristics which work together to create its physical Character. The ten characteristics help to nurture and sustain a sense of Community. They work to positively address environmental issues affecting Climate. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework."

The ten characteristics are summarised as follows:

Context – enhances the surroundings;
Identity – attractive and distinctive;
Built form – a coherent pattern of development;
Movement – accessible and easy to move around;
Nature – enhanced and optimised;
Public spaces – safe, social and inclusive;
Uses – mixed and integrated;
Homes and buildings – functional, healthy and sustainable;
Resources – efficient and resilient; and
Lifespan – made to last.

A National Model Design Code will be published and consulted on in due course and will form part of this guidance. This will set standards for key elements of successful design.

Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2018

The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paragraph 16, as below:

[25] Paragraph: 020 Reference ID: 18a-020-20140306
[26] Paragraph: 020 Reference ID: 18a-020-20140306

"*Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;*

Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation's social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing."

When making a listing decision, paragraph 17 sets out that the Secretary of State may also take into account:

"*Group value: The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.*

Fixtures and features of a building and curtilage buildings: The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.

The character or appearance of conservation areas: In accordance with the terms of section 72 of the 1990 Act, when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area."

General principles for selection are also set out in this advice, in paragraphs 18-23. These include: Age and rarity; Buildings less than 30 years old; Aesthetic merits; Selectivity; and National interest, although State of repair will not usually be a relevant consideration.

In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been published by Historic England, first in 2011 and then later updated. These Selection Guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic interest when assessing each building type.

Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment 2015

This document provides advice on the implementation of historic environment policy in the Framework and the related guidance given in the NPPG. For the purposes of this report, the advice includes: assessing the significance of heritage assets; using appropriate expertise; historic environment records; and design and distinctiveness.

It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

"1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the Framework;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected."

With particular regard to design and local distinctiveness, advice sets out that both the With regard to design and local distinctiveness, advice sets out that both the NPPF (section 7) and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

(b) The history of the place

(c) The relationship of the proposal to its specific site

(d) The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept

(e) The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size

(f) The size and density of the proposal related to that of the existing and neighbouring uses

(g) Landmarks and other built or landscape features which are key to a sense of place

(h) The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces

(i) The topography

(j) Views into, through and from the site and its surroundings

(k) Landscape design

(l) The current and historic uses in the area and the urban grain

(m) The quality of the materials

Historic England: Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2017 (2nd Edition)

GPA Note 3 provides information to assist in implementing historic environment policy with regard to the managing change within the setting of heritage assets, and also now views analysis. This also provides a toolkit for assessing the implications of development proposals affecting setting and views. A series of stages are recommended for assessment, these are:

a) *"Step 1: identifying the heritage assets affected and their settings*

b) *Step 2: assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)*

c) *Step 3: assessing the effect of the Proposed Development*

d) *Step 4: maximising enhancement and minimising harm*

e) *Step 5: making and documenting the decision and monitoring outcomes*."

Historic England: Advice Note 1: Conservation Area Designation, Appraisal and Management 2019 (2nd Edition)

This Historic England Advice Note supports the NPPF and NPPG and is intended to set out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management. It seeks to offer advice to all those involved in managing conservation areas so that the potential of historic areas worthy of protection is fully realised, the need for community and owner consultation examined, and the benefits of management plans to manage change, and achieve regeneration and enhancement, fully exploited. Advice on appraisal of conservation areas is also given, as assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.

Historic England: Advice Note 2: Making Changes to Heritage Assets 2016

This advice note provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition, and alteration, as well as on works for research alone. This covers different types of heritage assets, including buildings and other structures; standing remains including earthworks; buried remains and marine sites; as well as larger heritage assets including conservation areas, registered landscapes, and World Heritage Sites.

Historic England: Advice Note 12: Statements of Heritage Significance 2019

This Historic England Advice Note provides general advice regarding preparation of statements of heritage significance and analysing of significance for the full range of heritage assets. This is designed primarily for applicants proposing changes to heritage assets and accords with the Framework.

English Heritage (now Historic England): Conservation Principles: Policies and Guidance 2008

This guidance document sets out Historic England's approach to making decisions and offering guidance about all aspects of England's historic environment. The contribution of elements of a heritage asset or within its setting to its significance may be assessed in terms of its "heritage values":

"Evidential Value: the potential of a place to yield evidence about past human activity.

Historical Value: the ways in which past people, events and aspects of life can be connected through a place to the present.

Aesthetic Value: the ways in which people draw sensory and intellectual stimulation from a place.

Communal Value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' (Paras. 30-60)"

A draft has been released for public consultation and subsequent revision of this document in 2018.

Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013)
This document has been prepared by the Landscape Institute and the Institute of Environmental Management and Assessment. This industry standard work on LVIA presents an authoritative statement of the principles of assessment. It offers detailed advice on the process of assessing the landscape and visual effects of developments and their significance.

Townscape Character Assessment: Technical Information Note 05/2017 (Revised April 2018)
This Technical Information Note was prepared by the Landscape Institute to explain how the principles and general approach of landscape character assessment can be applied to a townscape character assessment.

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