

BUILT HERITAGE, TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

FLINT STREET - 53 CASTLE STREET, READING, RG1 7TH

MAY 2026



Written by: David Taylor, Thomas Bender and Bridget Crossley

© Copyright 2026. All worldwide rights reserved. No part of this publication may be reproduced, stored in a retrieval system or transmitted in any form by any other means whatsoever: i.e. photocopy, electronic, mechanical recording or otherwise without the prior written permission of the copyright holder.
Montagu Evans LLP is a limited liability partnership registered in England and Wales with registered number OC312072. Registered office 70 St Mary Axe, London, EC3A 8BE.

Any enquiries should be directed to:
Montagu Evans LLP
70 St Mary Axe,
London, EC3A 8BE
Tel: +44 (0)20 7493 4002

All Ordnance Survey Plans are © Crown Copyright.
All rights reserved. Licence Number: 100007624

CONTENTS

	NON-TECHNICAL / EXECUTIVE SUMMARY	3		5.0 BASELINE: BUILT HERITAGE	40
	Site Context			Designated Heritage Assets	
	Design Development				
	Heritage			6.0 BASELINE: TOWNSCAPE	54
	Townscape and Visual			Townscape Summary	
	Summary				
1.0	INTRODUCTION	8		7.0 BASELINE: VISUAL	60
	The Site and surrounding context			Extent of Visibility	
	The Proposed Development			Representative Views	
	Purpose of the Report			Visual Receptors	
	Structure of the BHTVIA			Summary	
2.0	METHODOLOGY	12		8.0 ASSESSMENT: HERITAGE ASSETS	70
	The Study Area			Indirect Effects on Heritage Assets (setting)	
	Accurate Visual Representations			Cumulative	
	Assessment Process Framework			Section Summary	
	Cumulative Effects				
3.0	LEGISLATION AND PLANNING POLICY	20		9.0 ASSESSMENT: TOWNSCAPE	78
	Legislation			Description of the Proposed Development	
	Development Plan			Direct Townscape Effects	
	National Policy			Indirect Townscape Effects	
	Material Considerations			Cumulative	
	Policy discussion			Section Summary	
4.0	BASELINE: HISTORICAL DEVELOPMENT	28		10.0 ASSESSMENT: VISUAL	88
	Historical development of Reading			Representative Views	
	Historical development of the Site			Cumulative	
				Non-verified views	
				11.0 CONCLUSION	96

APPENDICES
01: FULL SET OF HERITAGE ASSET, TOWNSCAPE CHARACTER AREA AND VIEW LOCATION PLANS INCLUDING ZTV OVERLAY
02: VERIFIED VIEWS PREPARED BY EB7
03: VERIFIED VIEW METHODOLOGY PREPARED BY EB7
04: NON-VERIFIED VIEW PRODUCED ON VUCITY

NON-TECHNICAL / EXECUTIVE SUMMARY

This report provides an assessment of the impact of redevelopment proposals at 53 Castle Street, Reading, RG1 7TH (hereafter the ‘Site’ or ‘Flint Street’) on heritage, townscape and visual receptors.

‘Heritage’ and ‘Townscape and Visual’ are treated as individual disciplines and separate assessments are provided in accordance with legislation, planning policy and best practice guidance. In particular, the heritage assessment is carried out in accordance with the Historic England guidance document Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017). The townscape and visual assessment has been carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013).

The assessment and design development has been informed by visual tools, including a zone of theoretical visibility (ZTV) prepared using VuCity software and 14 accurate visual representations prepared by EB7. The location of the viewpoints has been informed by architectural and historic accounts of the area, an appraisal of the Site and surroundings, and planning policy.

SITE CONTEXT

The Site is occupied by the former Thames Valley Police Station. It lies within Reading town centre and forms part of the civic quarter, alongside the Magistrates’ Court and the Hexagon, both constructed in a similar architectural style and period.

Since Thames Valley Police vacated the premises in December 2025, the Site has been vacant and comprises brownfield land. The existing building dates from 1968 and is constructed in red brick with extensive upper-level glazing. It has limited architectural merit and a poor urban design relationship with Castle Street, being set back behind surface-level car parking and a raised ground floor.

The surrounding area contains a diverse mix of commercial, office, retail, leisure and residential uses. To the west, the A239 Inner Distribution Road (IDR) forms a strong physical and visual barrier through the town centre. The IDR junction with Castle Street separates the Site from the St Mary’s Butts and Castle Street Conservation Area, which lies immediately to the south and east. The Conservation Area encompasses the historic core of Reading, including Reading Minster (Grade I) located 200m to the east of the Site on the other side of the civic quarter. It includes further listed buildings, such as the Grade II listed Vachel Almshouses immediately south of the Site.

Policy Designations and Development Framework

The 2019 Local Plan identifies the Site in the West Side Major Opportunity Area and also within the Western Tall Building Cluster. The Local Plan Partial Update: Tall Buildings Strategy Update Note (2025) maintains that the Character Area 16: Civic Centre remains suitable for a tall building.

The Minster Quarter Area Outline Development Framework (2018) identifies the area as a significant development opportunity. The document outlines that ‘there will be a mix of residential, office / commercial / retail and leisure / community facilities, built to high densities that will include tall buildings, complemented by high quality open spaces (as large as those that they replace) that together will create a new destination and a desirable place to live and be at one’s leisure.’

The Framework identifies the southern section of the Site fronting Castle Street within ‘Tier 1’ suitable for medium height of building form in relation to local context, and the northern part of the Site within Tier 2 where taller (local) elements of roofscape can go up 12 storeys. To the immediate north of the Site and within the northern extent of the masterplan area are Tier 3 – Landmark Zone, with height beyond 12 storeys. This area overlaps with the recent consent at Broad Street Mall (planning ref. PL/24/0173) which included three tall buildings of 19, 26 and 30 storeys.

It is evident that the Site is located within an area where significant change is anticipated. The emerging design proposals have had regard to both the existing and emerging context.

DESIGN DEVELOPMENT

The proposals (the ‘Proposed Development’) comprise the demolition of the existing building and the erection of a residential-led mixed-use scheme arranged in two blocks. Block A fronts Castle Street, Cusden Walk and the newly created Flint Street, incorporating four-, six-, seven- and ten-storey elements. Block B is located in the north-west corner of the Site and steps from 12 to 16 storeys. The development includes Use Class C3 residential units, with flexible Use Class E and sui generis uses at ground floor (and some lower ground floor), alongside new public realm, hard and soft landscaping, access and servicing arrangements, cycle parking and other associated works.

The design is informed by a detailed understanding of the Site and its context. It has evolved through constructive engagement with Reading Borough Council officers and the independent FRAME Design Review Panel (DRP). The design has also been subject to review by the applicant team which identified a series of targeted design moves, informed by visual analysis and testing. These included:

- Castle Street Frontage: The height and scale of Block A along Castle Street were reduced and simplified to establish a consistent datum and strengthen townscape coherence.
- Roundabout Corner: The south-western corner of Block A fronting the roundabout was resolved and given a more assertive form, responding to the scale of the junction.

Eastern Block Adjustment: The eastern element of Block A was reoriented to enlarge the central courtyard, improving residential quality and amenity.

- Views from the Almshouses: These adjustments improved axial views looking north from the Grade II listed Vachel Almshouses immediately south of the Site.
- Tallest Block: The tallest building was consolidated and simplified to improve clarity, legibility and skyline composition.
- Views to Reading Minster: The layout and massing were refined to improve and frame east–west views towards Reading Minster.

Following a further pre-application meeting in July 2025, the design was refined to demonstrate that the tallest building would complement, and not prejudice, adjacent development coming forward as part of the Framework. Separation distances were increased from 6.1m to 8m, anticipating an overall separation of approximately 16m across sites. The height of Block B was reduced from 14 and 20 storeys to 12 and 16 storeys, and its form rationalised to achieve a more balanced skyline profile.

The design was presented to the FRAME DRP in February 2026. The Panel confirmed that the proposed heights were appropriate for this strategic gateway location and emerging context, and that the stepped massing responded well to differing site conditions, including the conservation area to the south and town centre to the north. The design has subsequently evolved further to ensure a simple, coherent and rational architectural approach.

HERITAGE

This report outlines the significance of heritage assets in the area surrounding the Site and the contribution of setting to that significance. It provides an assessment of the impact of the proposals upon significance by virtue of a change to setting.

The assessment has considered all heritage assets within a 500m radius of the Site. The study area includes three conservation areas; 93 statutorily listed buildings; and, a handful of locally listed buildings located outside of conservation areas. There are no Registered Park and Gardens or other landscape designations on or in the vicinity of the Site. A ZTV was used to understand where there may be intervisibility between the identified heritage assets and the Proposed Development. Heritage assets within the study area that demonstrated no or very limited intervisibility, and/or were both physically and functionally separated from the Site, were scoped out of the assessment.

The Site is not in a conservation area, but the western part of the St Mary's Butts and Castle Street Conservation Area (StMBCSCA) sits opposite the site boundary. The StMBCSCA comprises a large number of listed buildings, some of which are highly graded, such as the Church of St Mary (grade I) and Holybrook House, located opposite the Site, listed at grade II*. To the west of the Site, on the opposite side of the IDR, is the Russell Street and Castle Hill Conservation Area (RSCHCA) which contains several listed buildings concentrated around Oxford Road, Baker Street and Castle Hill.

Since the construction of the IDR and the shopping malls nearby, much of the area around the Site is dominated by multi-lane carriageways and slip roads, inactive frontages and underutilised open space which eroded the setting of the heritage assets in the study area. Whilst the red brick of the old police station on the Site references the historic buildings of Castle Street, its appearance and urban design limitations detract from the character and quality of the both the Russell Street and Castle Hill Conservation Area and the StMBCSCA, and the listed buildings they contain.

The Proposed Development seeks the comprehensive redevelopment of the Site, removing the existing building and unlocking the potential to better integrate with the surrounding area. Along Castle Street it is proposed to institute a consistent and strong building line which helps to create a positive relationship with the StMBCSCA, where the historic relationship was eroded with the cutting of the IDR and the enlargement of the junction with Castle Street and the construction of the Thames Valley Police Station.

The proposed scale of development along Castle Street ranges from four and six storeys. In conjunction with the building line, these buildings provide a balance to the lower-rise buildings located in the StMBCSCA to the south. This follows the guidance set out in the 2018 Framework, and helps create a better transition to the StMBCSCA. Design development also improved axial views looking north from the Grade II listed Vachel Almshouses immediately south of the Site. Finally, an aesthetic 'rhythm' has also been created through architectural tools, such as roofline, shadows gaps or bays.

Owing to the composition of the Proposed Development, the tallest element would be positioned away from the most sensitive heritage assets along Castle Street. These buildings have also been tested in longer range

views from heritage assets in the surrounding area. No harmful effects on designated or non-designated heritage assets have been identified.

The proposed improvements to the Castle Street streetscape – through enhanced architectural quality and upgraded public realm – would serve to enhance the setting of the StMBCSCA and the assets within it. The anticipated heritage effects of the Proposed Development are considered to align with the objectives of the Local Plan and the Minster Quarter Area Development Framework. On this basis, the effects of the Proposed Development are assessed as beneficial, but not significant.

TOWNSCAPE AND VISUAL

The townscape assessment considers the proposals within their urban context, including the buildings, the relationships between them, the different types of open spaces and the relationship between buildings and open spaces.

The Proposed Development proposes two blocks, including a tall element of 16 storeys overlooking the IDR and a U-shape lower-rise block, addressing Castle Street and Flint Street.

The block along Castle Street would have four to six storeys, relating to the heights of the building opposite. It would step up to seven and 10 storeys, framing a courtyard garden that overlooks Flint Street. Shopfronts would activate the wider streetscape both along Castle Street and Flint Street. Flint Street would become a new east-to-west pedestrian connection, linking the neighbourhoods to the west of the IDR with the core of the town centre, and repairing the historic street layout.

To the north, a taller building of up to 16 storeys is proposed. This addresses the IDR, whilst also mediating in scale with the lower-rise buildings at Castle Street and the existing and emerging development to the north, including the consent at Broad Street Mall. The height and design has been considered in light of the context of the Framework, seeking to ensure that it does not prejudice any emerging proposals.

The Proposed Development would deliver efficient, high-performing buildings providing high-quality mixed-use accommodation. The Site is considered appropriate for a building of the proposed scale and uses, which would complement and reinforce the existing functions of Reading town centre. In doing so, the Proposed Development would enhance the overall attractiveness of the area, activate Castle Street, and make a positive contribution to the local economy.

In summary, the proposed scale, composition and mix of uses, together with the high quality of the design, are assessed as giving rise to beneficial effects. While the Proposed Development would result in a major change to the existing Site, the nature of this change would be consistent with the strategic objectives established in the Local Plan and the Minster Quarter Area Development Framework. Accordingly, the transformation of the Site is considered to represent an appropriate and policy-aligned form of development within the context of the surrounding townscape and wider area. On this basis, the townscape effects of the Proposed Development are assessed as beneficial.

The visual assessment considers the impact of the proposed development upon visual receptors. The assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.

A ZTV was created using topographically referenced three-dimensional models from VuCity software to outline the potential areas where the Proposed Development may be visible. The ZTV covers an area of 2 km² from the centre of the Site. It is a tool for a high-level understanding of the extent of visibility, which was further interrogated through review of individual viewpoints using field surveys and digital software.

The assessment in the HTVIA has been informed by visual analysis, including AVRs. The location of 14 viewpoints, selected to assess the Proposed Development's visual impact, has been agreed with officers at Reading Borough Council during the pre-application process. The viewpoints are located in sensitive locations, near the Almshouses opposite, along Castle Street and the IDR and near Reading Minster, for example. Two viewpoints to the west of the IDR illustrate the intervisibility with the scheme from the Russell Street and Castle Hill Conservation Area. Two longer range views have been included to illustrate the skyline impacts from these areas.

The visual analysis demonstrates that the Proposed Development would be occluded in longer distance views, including sensitive views from the east within the town centre. Where visible, the resulting change would be beneficial, contributing to the uplift of Castle Street and enhancing wayfinding and legibility within this part of Reading town centre. The visual impact of the Proposed Development is considered to align with the objectives of the Local Plan and the Minster Quarter Area Development Framework. On this basis, the visual effects of the Development are assessed as beneficial.

SUMMARY

The Proposed Development has evolved through a detailed understanding of the Site, its surrounding context and the aspirations of the Local Plan. Design development has benefited from discussions with officers at Reading Borough Council and the DRP.

The scheme forms part of a wider masterplan for redevelopment of this strategically important area within Reading. It will optimise the use of this brownfield site, which is chronically underutilised at present. In doing so, it will deliver a new mixed-use scheme that will reinforce this developing neighbourhood. The design will not harm any identified heritage assets and, moreover, would give rise to significant beneficial urban design and townscape improvements to the study area, including its character and function. The Proposed Development will also demonstrably improve the visual amenity of the Site. It will help deliver the intensification and transformative change to the Site and wider study area, in accordance with the aspirations of the Local Plan.

1.0 INTRODUCTION

FLINT STREET - 53 CASTLE STREET, READING, RG1 7TH

INTRODUCTION

1.1 Montagu Evans has been instructed by S2 Estates (hereafter referred to as the ‘Applicant’) to provide consultancy services and produce this Built Heritage, Townscape and Visual Impact Assessment (the ‘BHTVIA’) in support of proposals which are subject to a detailed planning application at 53 Castle Street, Reading, RG1 7TH (the ‘Site’).

THE SITE AND SURROUNDING CONTEXT

1.2 The Site is located in Reading Borough Council (the ‘Council’ or ‘RBC’). The Site is described in the Design and Access Statement (DAS) prepared by JTP. **Figure 1.1** shows the boundary of the Site, and an aerial view is provided at **Figure 1.2**.

1.3 The Site is currently occupied by the former Thames Valley Police Station. The Site boundary incorporates approximately 0.63 hectares, including the hard standing, carparking and landscaping which surrounds the building.

1.4 The building steps up from two storeys on Castle Street to five storeys in the northwest corner. The building dates from 1968 and is constructed with red brick, with extensive glazing to the upper storeys. The Site is at podium level, with a basement carpark below access on Castle Street. There is additional street level parking on Castle Street and the rear on San Francisco Libre Walk.

1.5 The surrounding area comprises a mix of commercial, office, retail, leisure and residential uses. The podium continues north and east along San Francisco Libre Walk to Broad Street Mall. To the north of the Site is Hexagon Theatre and the Lavender Place Community Gardens, which sits at lower ground level in the footprint of the former Civic Offices (demolished in 2016).

1.6 Further north is Broad Street Mall, a shopping centre dating to 1971 and Fountain House. To the east of the Site is Reading Magistrates Court and further east are several listed buildings on the north side of Castle Street. The Site abuts the St Mary’s Butts and Castle Street Conservation Area, which encompasses the historic core of Reading with Reading Minster (Grade I) at its centre. To the south of the Site, on the south side of Castle Street are several listed buildings, including the Grade II Listed Vachel Almshouses.

1.7 To the west across the A239/inner distribution road (the ‘IDR’) are a mix of uses including offices and a large residential area encompassing the Castle Hill and Russell Street Conservation Area.

THE PROPOSED DEVELOPMENT

1.8 The Proposed Development seeks to demolish the former Thames Valley Police Station and replace it with a residential-led mixed use development. The Proposed Development is arranged in two blocks, with Block A lining Castle Street, Cusden Walk and the new Flint Street and incorporating four, six, seven and ten storey elements. Block B is located in the northwest corner of the Site and steps up from 12 to 16. The Proposed Development incorporates various uses at ground floor, including retail and ancillary residential facilities, and associated car and cycle parking. The Proposed Development further offers a comprehensive landscaping scheme, including public space and private residents gardens.

1.9 The description of development (the ‘Proposed Development’) is as follows:
“Full planning permission for the demolition of the existing building and the erection of a residential-led mixed-use development comprising Use Class C3 residential units, with Use Class E and Sui Generis on the ground floor and with some elements at lower ground floor, plus public realm, hard and soft landscaping, access and servicing arrangements, cycle parking, and other associated works.”

PURPOSE OF THE REPORT

1.10 The HTVIA provides an assessment of the impact of the Proposed Development on heritage assets, townscape character and visual amenity.

1.11 The (built) heritage assessment will consider the significance of heritage assets and the impact of the Proposed Development upon that significance. As noted, the Site does not comprise any designated or non-designated heritage assets. It is, however, situated within the setting of heritage assets, including listed buildings, conservation areas and non-designated heritage assets (locally listed buildings). The assessment identifies those heritage assets which have the potential to be affected by the Proposed Development, owing to a change to their setting.

1.12 The townscape assessment will consider the Proposed Development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces.

1.13 The visual assessment will consider the impact of the Proposed Development upon visual receptors. The assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.

1.14 The assessment is informed by Accurate Visual Representations (‘AVRs’ or otherwise referred to as ‘Verified Views’). The location of the viewpoints has been informed by architectural and historic accounts of the area, an appraisal of the existing Site and surroundings, and relevant policy designations. Viewpoints have been agreed with officers at the Council through the pre-application consultation process.

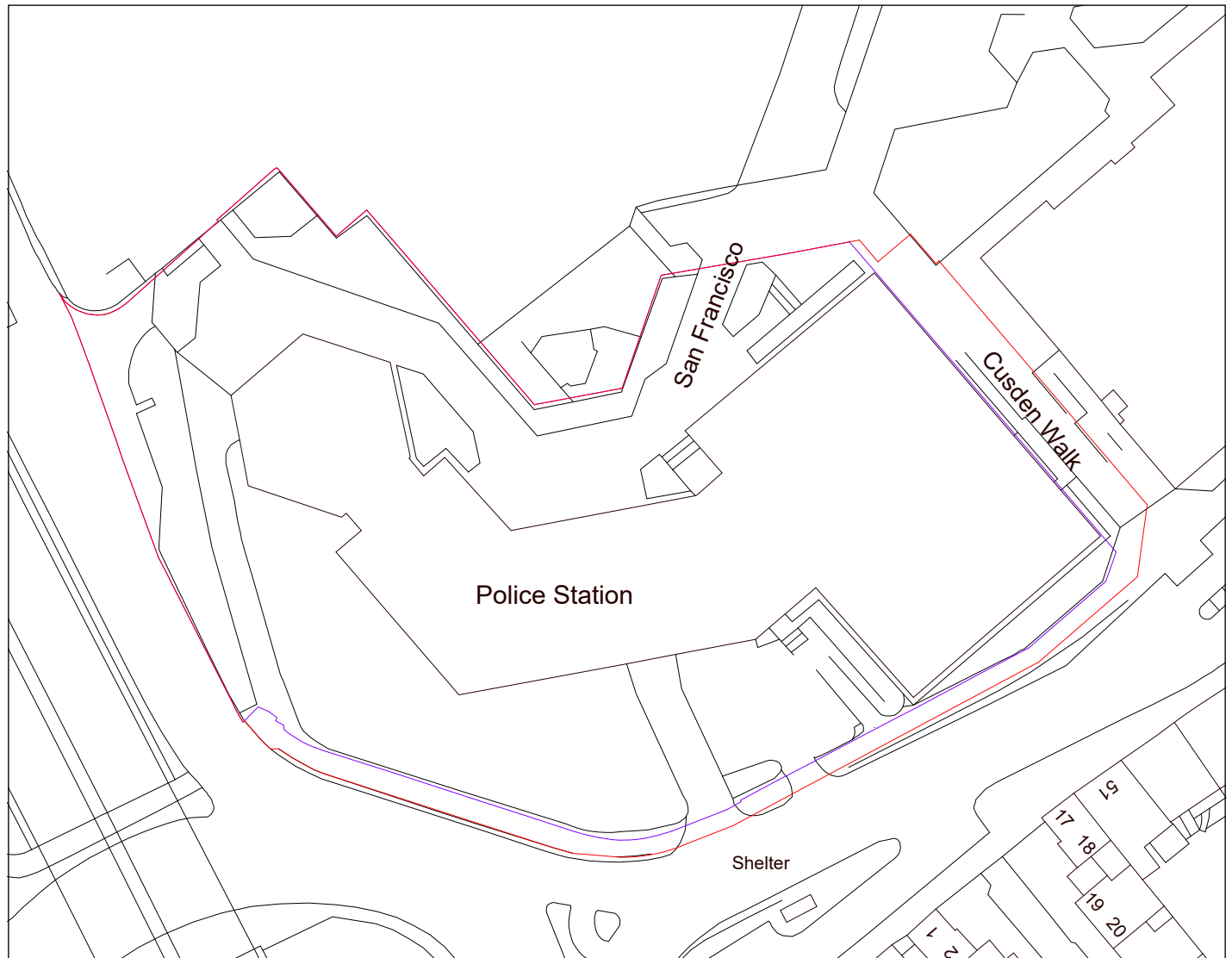


Figure 1.1 Site Plan



Figure 1.2 Aerial View. Source: Google (base map)

STRUCTURE OF THE BHTVIA

- 1.15 The HTVIA is structured as follows:
 - 1.15.1 The methodology for undertaking the HTVIA is provided at **Section 2.0**;
 - 1.15.2 Legislation, planning policy and guidance relevant to the assessment of likely effects on heritage, townscape and visual receptors is set out at **Section 3.0**;
 - 1.15.3 A description of the historical development of the Site and surrounding area is provided at **Section 4.0**;
 - 1.15.4 An assessment of the significance of heritage assets which have been identified for assessment is provided at **Section 5.0**;
 - 1.15.5 A description of the existing townscape character of the Site and surrounding area is provided at **Section 6.0**;
 - 1.15.6 A description of the existing visual amenity is provided at **Section 7.0**;
 - 1.15.7 **Section 8.0** provides an assessment of the impact of the Proposed Development on the significance of heritage assets;
 - 1.15.8 The impact of the Proposed Development on townscape character areas is assessed at **Section 9.0**;
 - 1.15.9 An assessment of the impact of the Proposed Development on visual receptors is provided at **Section 10.0**;
 - 1.15.10 An analysis of how the Proposed Development performs against relevant legislation and planning policy, and a conclusion is provided at **Section 12.0**.

2.0 METHODOLOGY

FLINT STREET - 53 CASTLE STREET, READING, RG1 7TH

METHODOLOGY

2.1 This section provides an overview of the assessment framework. The method is the product of legislation, policy and best practice guidance.

THE STUDY AREA

2.2 The Study Area has comprised the following:

- All designated and non-designated heritage assets (500m radius) including:
 - Listed Buildings;
 - Conservation Areas;
 - Registered Parks and Gardens; and
 - Locally Listed Buildings (non-designated heritage assets).
- Townscape Character Areas (500m radius); and
- Visual Receptors (informed by studies of the visibility of the Proposed Development, including beyond the identified 500m radius).

2.3 Site observations, a manual desk-based review of OS maps, characterisation studies and relevant heritage assets were used to determine the study area. The study area has been informed by building locations and heights, topography and townscape features, and an understanding of the scale of the Proposed Development.

2.4 **Section 7.0** identifies viewpoints that have informed the 'visual study area'. The study area may be defined as the anticipated extent of visibility (from a height of approximately 1.6m (eye level) above the ground). It is acknowledged and accepted that judgments made by a surveyor are subjective, which provides limitations to the identification of a visual envelope. There will be areas within the study area where visibility is not possible e.g. due to interposing development. Conversely, the assessment considers further long distance views where identified and relevant.

2.5 A zone of theoretical visibility (ZTV) has also been produced using VuCity software to outline the potential areas where the Development may be visible, covering an area of 2 km2 with the Site at the centre (**Figure 2.1**). The ZTV has been produced using topographically referenced three-dimensional models from VuCity software. It is a tool for a high-level understanding of the extent of visibility, which was further interrogated through review of individual viewpoints using field surveys and digital software.



Figure 2.1 Zone of Theoretical Visibility prepared using VU.CITY software

SITE VISIT

- 2.6
- A site survey of the baseline situation was undertaken by Montagu Evans to understand the Site and its surrounds.
- 2.7
- The HTVIA as a whole is informed by a suite of 14 AVRs. The AVRs have been prepared in accordance with best practice guidance, including TGN 06/19 Visual Representation of Development Proposals Technical Guidance Note (2019) by the Landscape Institute. The full suite of AVRs is included in **Appendix 2.0**, as well as throughout this report where relevant to the assessment. The methodology for the AVRs, prepared by EB7, is provided at **Appendix 3.0**.

The AVRs are provided in the following scenarios:

 - **Existing** – baseline photography;
 - **Proposed** – ‘existing’ plus wireline (AVR1) or render (AVR3) of the Proposed Development; and
 - **Cumulative** – ‘proposed’, plus wireline (AVR1) of material consents surrounding the Site.

The objective of a photomontage is to simulate the likely visual changes that would result from a proposed development, and to produce printed images of a size and resolution sufficient to match the perspective in the same view in the field.

Accurate visual representation is two-dimensional and cannot capture the complexity of the visual experience. It approximates the three-dimensional visual experience the observer would receive on site. Neither do they capture transient significant effects arising from noise or traffic on perception, or that wider range of expectations and associations that anyone in an urban scene may have.

A visit to the location from which the photographs were taken is strongly encouraged to appreciate and understand the visual impact.
- ACCURATE VISUAL REPRESENTATIONS
- ASSESSMENT PROCESS FRAMEWORK
- HERITAGE
- 2.12

The term ‘heritage asset’ is used within this assessment to describe both designated (e.g. Listed Buildings, Registered Park and Garden, Registered Battlefield or Conservation Area) or non-designated (identified by the local authority, such as locally listed buildings or buildings of townscape merit) assets. For the purposes of this HTVIA, built heritage assets do not include archaeological remains.

2.13

Paragraph 207 of the NPPF states:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

‘Significance’ (for heritage policy) is defined in the NPPF (Annex 2) 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.

This is reaffirmed by Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015).

Where a proposal may have an effect on the surroundings in which the heritage asset is experienced, a qualitative assessment is made of whether, how and to what degree setting contributes to the significance of heritage assets. Setting is defined in the NPPF 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.

2.17

The assessment of setting is informed by the checklist of potential attributes outlined by the Historic England guidance document Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) (hereafter “GPA3: Setting”).

2.18

GPA3: Setting identifies five steps towards assessing the implications of development proposals which may affect the setting of heritage assets (it is consistent with other guidance):

 - Identify the assets affected
 - Assessing the contribution setting makes to significance
 - Assessing the effect of the proposed development
 - Maximising enhancement and minimising harm
 - Making and documenting the decision and monitoring outcomes

Part e is incumbent on the decision maker, through the provision of conditions.

2.19

TOWNSCAPE AND VISUAL VALUE

2.20

The framework for assessment of townscape and visual impact has been prepared using the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (‘GLVIA3’). The two components of townscape and visual assessment are:

 - The assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and
 - The assessment of visual effects: assessing effects on the general visual amenity experienced by people. Specific views are also assessed where they form strategic views designated in the development plan, or where agreed with the competent authority.

TOWNSCAPE VALUE

2.21

The townscape baseline assessment describes character areas/types and their characteristics. It defines the distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. Areas are defined and mapped with boundaries that suggest a sharp change from one townscape area to another; however, on site, changes can be more subtle and practically, this often represents a zone of transition. Criteria to assess townscape character areas and apportion value is contained in **Table 2.1**.

BUILT HERITAGE, TOWNSCAPE AND VISUAL IMPACT ASSESSMENT | MAY 2026

- 2.22

The assessment is informed by an understanding of how an area has evolved, the use of aerial photography and field survey, along with desk-based research as appropriate and to a level commensurate with the sensitivity of the receptor and its susceptibility to change. Important published sources will normally comprise formal character assessments prepared, for example, as part of local plan making or agencies or county authorities.
- 2.23

The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the townscape is experienced and the value attached to it. This assessment cannot practically and objectively capture what local people in an area feel about their area (unless of course this has been subject to a specific study which is produced in an objective or reflective manner). Thus, this value analysis reflects professional judgment.

TOWNSCAPE RECEPTOR VALUE			
Value	Importance	Typical Criteria	Typical Features / Characteristics
Very High	International / National	Unique or outstanding townscape with clearly distinctive characteristics, features and elements; Widespread use of quality materials; Very strong urban structure, characteristic patterns and balanced combination of built form and open space; Appropriate management for land use; No, or very limited, detracting features.	International or national designation, and/or designated heritage assets of significant importance
High	National / Regional / Local	Distinctive or unusual townscape with notable features and elements; Evident use of quality materials; Strong urban structure, characteristic patterns and balanced combination of built form and open space; Appropriate management for land use with limited scope to improve; Limited detracting features.	National or regional designation, and/or designated heritage assets
Medium	Regional / Local	Attractive townscape with occasional distinctive features; Recognisable urban structure, characteristic patterns and combinations of built form and open space; Scope to improve management for land use; Some detracting features.	Regional or local recognition, including local plan designations, with value possibly expressed through literature and cultural associations.
Low	Local	Commonplace or ordinary townscape with limited variety or distinctiveness; Distinguishable urban structure, characteristic patterns and combinations of built form and open space, although often fragmented; Scope to improve management or land use; Potentially some dominant detracting features and areas of very low value.	Some positive townscape features but largely degraded and may benefit from regeneration, restoration or enhancement.
Very Low	Local	Very common townscape, often in decline; Weak or degraded urban structure, characteristic patterns and combination of built form and open space; Lack of management has resulted in degradation; Frequent dominant detracting features; Disturbed or derelict land requires treatment.	Heavily degraded townscape and/or identified for change.

Table 2.1 Townscape Receptor Value Criteria

VISUAL AMENITY VALUE

- 2.24
- The visual baseline assessment established the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.
- 2.25
- The baseline study identifies individuals and/or defined groups of people within the area who will be affected by changes in the views, ‘visual receptors’. The following visual receptors are identified by GLVIA3 as being likely to be the most susceptible to change:
 - Residents and other frequent users of the area;
 - People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, attractions or those whose attention or interest is likely to be focused on the landscape and on particular views; and
 - Communities where views contribute to the landscape setting enjoyed by residents in the area.
- 2.26
- Representative viewpoints are identified based on a comprehensive review of the surrounding area, including the following criteria:
 - Location and setting of Heritage Assets;
 - Townscape character;
 - Where the development may be prominent;
 - Be visible from concentrations of residential areas;
 - Open spaces (parkland, publicly accessible space);
 - Potentially sensitive receptors (e.g. schools);
 - Accessibility to the public;
 - The viewing direction, distance and elevation;
 - Townscape and transport nodes.
- 2.27
- The Site is not located within any strategic views as determined by the adopted London View Management Framework (LVMF) (2012).
- 2.28
- The visual amenity value of locations is assessed using the criteria contained in **Table 2.2**. Amenity is a broad concept in planning, and the Planning Portal [online] defines it as “A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.” Changes in amenity are typically assessed through changes to what people see and perceive, and the shorthand for this are ‘views’ and ‘visual impact’.

- 2.29
- The places at which or in which these individuals will experience a change will always be publicly accessible place, in line with best practice. The visual assessment is therefore separate to a ‘residential amenity assessment’, which considers private viewpoints from residential properties (refer to GLVIA3, paragraph 6.17). In some instances, the visual impact assessment will address impacts from private land, but that is only where this topic has been scoped with the decision maker and a specific methodology agreed. Such private land amenity assessments often rely on other concepts in town planning/measures such as privacy and enclosure or overbearing.

VISUAL AMENITY VALUE	
Value	Criteria / Examples
Very High	Areas of national or international importance and/or identified strategic views of national or international importance. Very enjoyable area with multiple positive elements and/or Very High townscape value.
High	Areas of national or regional importance, or particular local importance and/or static view identified in the development plan. Enjoyable area with several positive elements and/or High townscape value.
Medium	Areas of regional or local importance and/or static view identified in planning guidance, including conservation area appraisals. Pleasant area with some positive elements and/or Medium townscape value.
Low	Commonplace areas with limited positive elements and/or Low townscape value, often with detracting elements.
Very Low	Area of Very Low townscape value (e.g. industrial areas/busy main roads) that has very few positive characteristics, usually with significant detracting elements.

Table 2.2 Visual Amenity Value Criteria

TOWNSCAPE AND VISUAL SUSCEPTIBILITY

- 2.30
- The first stage in the assessment of the Proposed Development on a townscape or visual receptor is to identify its sensitivity to the Proposed Development. Sensitivity is identified by calibrating the baseline value of the receptor with its susceptibility, defined as the ability to accommodate the particular type and/or nature of development without undue consequences for the maintenance of the baseline situation and/or the achievement of planning policies and strategies. The criteria for determining townscape susceptibility is described at **Table 2.3** and visual susceptibility at **Table 2.4**.
- 2.31
- GLVIA3 explains landscape susceptibility at pages 88–89. There is no specific definition of townscape susceptibility. Professional judgment is applied based on the understanding of landscape susceptibility to reach judgments on townscape susceptibility.
- 2.32
- GLVIA3 describes susceptibility to change of landscape receptors as “the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies.”
- 2.33
- Susceptibility is relative to the general type of development proposed e.g. a receptor may be more or less susceptible to a proposal for an industrial facility as opposed to a residential building depending on the receiving environment. Equally, a receptor may be more or less susceptible to a tall building than a low-rise development depending on the receiving environment.

2.34 Effects are particular to the specific landscape/townscape in question, which includes reference to aspects such as the quality, nature, and condition of the receptor, or, existing scale and grain e.g. if the existing townscape is of a similar scale and/or grain as the proposed development, it may have a greater ability to accommodate the proposed development and thus a lower susceptibility to change, subject to those existing characteristics not undermining or undue consequence arising from that baseline condition or anticipated achievement of relevant townscape/ landscape planning policies, which includes site allocations or anticipated development identified in the statutory development plan.

TOWNSCAPE SUSCEPTIBILITY TO CHANGE CRITERIA	
High	The receptor has a low ability to accommodate the specific proposed change e.g. the existing townscape/landscape comprises very limited or no similar types of development to that proposed and/or the townscape/landscape policies do not anticipate this type of development.
Medium	The receptor has a moderate ability to accommodate the specific proposed change e.g. the existing townscape/ landscape comprises some similar types of development to that proposed and/or the townscape/landscape policies anticipate some of this type of development.
Low	The receptor has a high ability to accommodate the specific proposed change e.g. the existing townscape/landscape comprises several similar types of development to that proposed and/or the townscape/landscape policies anticipate this type of development.

Table 2.3 Susceptibility of Townscape Receptor to Change Criteria

VISUAL SUSCEPTIBILITY

2.35 GLVIA3 explains visual susceptibility at pages 113–114. Page 113 sets out that susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

- The occupation or activity of people experiencing the view at particular locations;
- The extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.

2.36 Visual receptors who are more likely to have a high susceptibility to change include residents at home, people who are engaged in activities that involve an appreciation of the surrounding landscape or townscape, and visitors to heritage assets or other attractions. This is the advice of GLVIA3; however, the guidance also makes it clear that this will not be true in all cases since susceptibility to change is to some extent, as noted, a function of context.

2.37 Again, and subject to that qualification, visual receptors who are more likely to have a low susceptibility to change include users of amenity space that does not depend on or involve an appreciation of the surrounding landscape / townscape such as people engaged in sports activities. GLVIA3 states that “each project needs to consider the nature of the groups of people who will be affected and the extent to which their attention is likely to be focused on views and visual amenity.”

VISUAL SUSCEPTIBILITY TO CHANGE CRITERIA	
High	The receptor has a low ability to accommodate the specific proposed change e.g. the visual receptor is likely to be heavily engaged on the view/visual amenity and/or the type of development is incongruent to the baseline condition or would undermine the enjoyment of the visual receptor.
Medium	The receptor has a moderate ability to accommodate the specific proposed change e.g. the visual receptor is likely to be partially engaged on the view / visual amenity and/or the type of development is congruent to aspects of the baseline condition or would undermine some aspects of the enjoyment of the visual receptor.
Low	The receptor has a high ability to accommodate the specific proposed change e.g. the visual receptor is likely to be not engaged on the view / visual amenity and/or the type of development is congruent to the baseline condition or would not undermine the enjoyment of the visual receptor.

Table 2.4 Susceptibility of Visual Receptor to Change Criteria

TOWNSCAPE AND VISUAL SENSITIVITY

2.38 The baseline value of the receptor and its susceptibility are calibrated using the matrix at **Table 2.5**. Sensitivity is recorded in a verbal scale (high, medium or low), supported by the clear narrative linked to evidence from the baseline study and an assessment of susceptibility.

TOWNSCAPE AND VISUAL SENSITIVITY			
Receptor Value	Susceptibility of Receptor to Change		
	Low	Medium	High
Very Low	Low	Low	Low/Medium
Low	Low	Low/Medium	Medium
Medium	Low/Medium	Medium	Medium/High
High	Medium	Medium/High	High
Very High	Medium/High	High	High

Table 2.5 Townscape and Visual Sensitivity (Nature of Receptor Likely to be Affected)

TOWNSCAPE AND VISUAL MAGNITUDE

2.39 The magnitude of impact is a qualitative judgement supported by the narrative text within the assessment. The professional judgement is quantified using criteria at **Table 2.6**. The judgement of magnitude considers the size or scale, geographical extent or duration and reversibility of the impact.

TOWNSCAPE AND VISUAL MAGNITUDE OF IMPACT	
High	Major change to the value of the townscape receptor or visual amenity. The proposals would be very noticeable, comprising a notable change over an extensive area or an intensive change over a more limited area. May comprise major alteration to key elements/features/characteristics of the receptor. The duration of this impact may be permanent and non-reversible.
Medium	Moderate change to the value of the townscape receptor or visual amenity. The proposals would be noticeable, comprising a recognisable change over a large area or a moderate change over a more limited area. May comprise alteration to one or more key elements/features/characteristics of the receptor. The duration of this impact may be semi-permanent and partially reversible.
Low	Minor change to the value of the townscape receptor or visual amenity. The proposals would be noticeable, although comprising a small change over a limited area or similar to a main component of the receptor. May comprise minor alteration to one or more key elements/features/characteristics of the receptor. The duration of this impact may be temporary and reversible.
Very Low	Barely discernible change to the value of the townscape receptor or visual amenity. The proposals would not be noticeable, although comprising a very small change over a very limited area or very similar to the main components of the receptor. May comprise very minor alteration to one or more key elements/features/characteristics of the receptor. The duration of this impact may be temporary and reversible.
Nil	No change to the value of the townscape receptor or visual amenity.

Table 2.6 Magnitude of Impact Criteria

TOWNSCAPE AND VISUAL LIKELY EFFECTS

2.40 Likely effects are determined by combining the judgements of sensitivity and the magnitude of impact using a common matrix shared across all topic areas (**Table 2.7**). Criteria defining the scale of effect is provided at **Table 2.8**.

TOWNSCAPE AND VISUAL LIKELY EFFECT ON RECEPTOR			
Magnitude	Sensitivity		
	Low	Medium	High
Nil	None	None	None
Very Low	Negligible	Negligible	Negligible / Minor
Low	Minor	Minor / Moderate	Moderate
Medium	Minor / Moderate	Moderate	Moderate / Major
High	Moderate	Moderate / Major	Major

Table 2.7 Likely Effect on Receptor Matrix

2.41 Professional judgement is required to determine the nature of the likely effects. Criteria defining the nature of effect is provided at **Table 2.9**. For example, there will be cases where a high magnitude of impact produces a major scale of effect, on the basis that the component is prominent or noticeable, but notwithstanding that the quality of effect is beneficial as a consequence of design quality or other benefits. This approach arises most often as a consequence of major developments in areas positively identified for transformational change. Often, such impacts will have varied effects such that a hard and fast categorisation of an effects quality is finely balanced as between beneficial or harmful. In many instances, therefore, the final identification of impact and effect will turn on discursive analysis. This makes a necessary professional adjustment to the tabular analysis format which can produce inaccurate reporting.

TOWNSCAPE AND VISUAL SCALE OF AN EFFECT	
Major	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a very significant effect.
Moderate	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a significant effect.
Minor	The change resulting from the impact of the Proposed Development upon the receptor would give rise to an effect, but this would not be significant.
Negligible	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a barely discernible effect. This would not be significant
None	The change resulting from the impact of the Proposed Development upon the receptor would have no effect.

Table 2.8 Scale of an Effect

2.42 The assessment of nature of effect also requires a qualitative discussion to describe and elucidate this judgement to the reader. This is necessary because townscape and visual assessment is not a strict quantitative process and some of these considerations will depend on expert judgements. Accordingly, there is an emphasis on qualitative text throughout the assessment to describe the receptors and the judgements in regard to the significance of the identified effects.

TOWNSCAPE AND VISUAL NATURE OF AN EFFECT	
Beneficial	An advantageous effect to a receptor
Neutral	An effect that on balance is neither beneficial nor adverse to a receptor.
Adverse	A detrimental effect to a receptor

Table 2.9 Nature of an Effect

CUMULATIVE EFFECTS

2.43 The cumulative schemes subject to this assessment are listed at **Table 2.10** and shown on the diametric diagram at **Figure 2.2**. The list has been identified owing to their scale and location relative to the Site, as well as how the Proposed Development will be experienced in the emerging context.

SITE LOCATION/ PROJECT NAME	LPA REFERENCES
John Lewis Customer Collection Point, Crossland Road, Reading, RG1 2HT	PL/24/1155
Existing Vue cinema complex west of Yield Hall Place/ London Road ('Yield Hall Place 2'), The Oracle, Reading, RG2 2AG	PL/22/1917/FUL
Former Debenhams Department Store, west of Yield Hall Place ('Yield Hall Place 1'), The Oracle, Reading, RG2 2AS	PL/22/1916/FUL
35-39 Friar Street Reading RG1 1DX	PL/22/0933
Station Hill, Reading	PL/20/1536
Broad Street Mall, Reading, RG1 7QG	PL/24/0173

Table 2.10 Cumulative Schemes

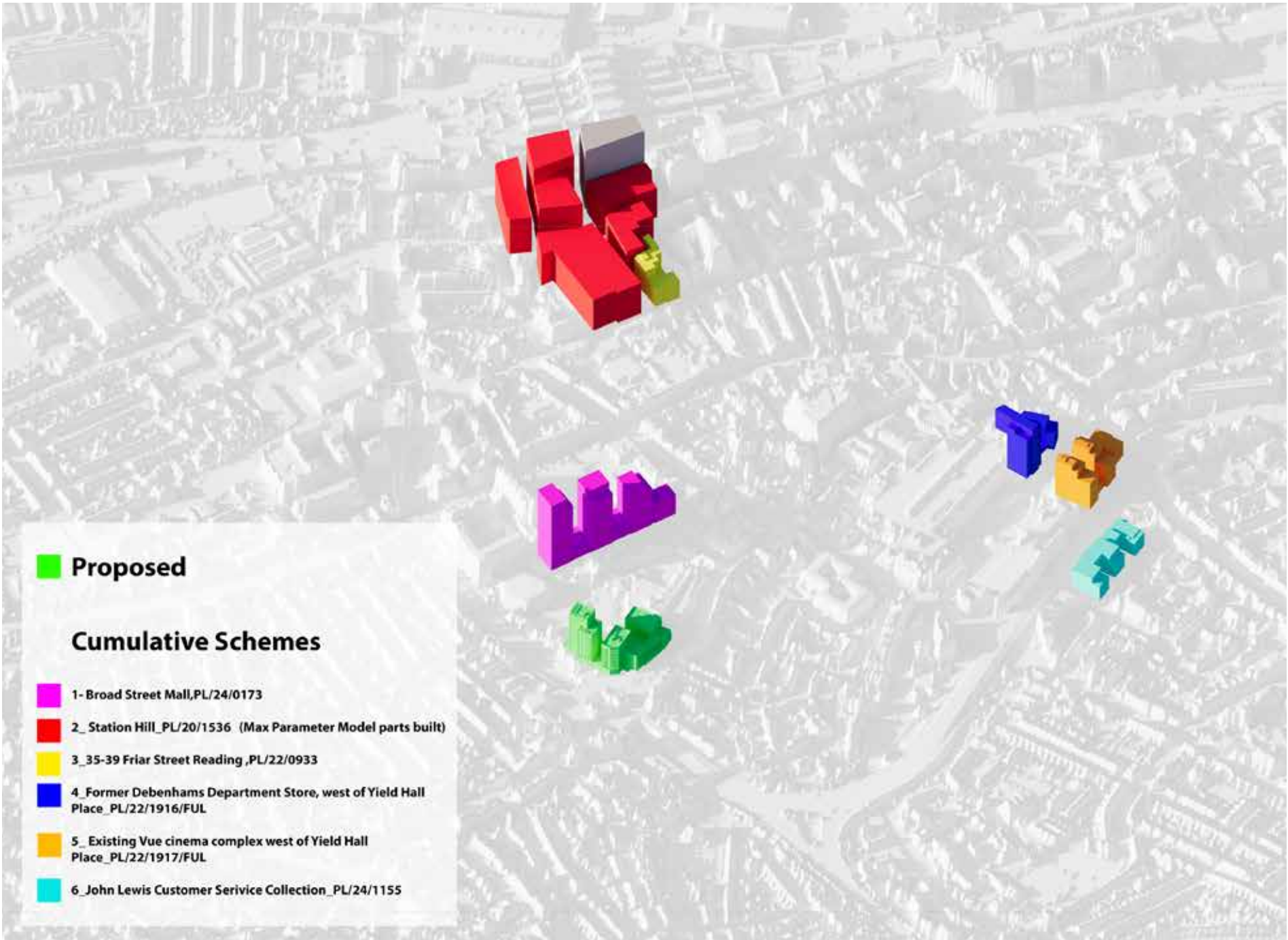


Figure 2.2 Diametric diagram showing location of cumulative schemes (EB7)

3.0

LEGISLATION AND PLANNING POLICY

FLINT STREET - 53 CASTLE STREET, READING, RG1 7TH

LEGISLATION AND PLANNING POLICY

3.1 The following section sets out the planning policy context for the Site and for the context of the assessment process.

LEGISLATION

PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 (AS AMENDED)

3.2 The Site does not comprise any statutorily listed buildings and nor is it located in a CA.

3.3 There are statutorily listed buildings which have been identified in the study area which may experience a change to their heritage value as a result of the Proposed Development changing their setting. The relevant statutory provisions are set out below.

3.4 Section 66(1) of the 1990 Act which states 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 and historical interest which it possesses.

DEVELOPMENT PLAN

3.5 The Levelling Up and Regeneration Act 2023 inserted section 38(6) to the Planning and Compulsory Purchase Act 2004 states that [our emphasis] the determination must be made in accordance with the development plan and any national development management policies, taken together, unless material considerations strongly indicate otherwise.

3.6 The statutory development plan and the policies relevant to the assessment of heritage, townscape and visual considerations are set out at **Table 3.1** below.

DEVELOPMENT PLAN POLICY	KEY PROVISIONS
Reading Local Plan (2019)	Policy CC6: Accessibility and the Intensity of Development Policy CC7: Design and the Public Realm Policy EN1: Protection and Enhancement of the Historic Environment Policy EN2: Areas of Archaeological Significance Policy EN4: Locally Important Heritage Assets Policy EN5: Protection of Significant Views with Heritage Interest Policy EN6: New Development in a Historic Context Policy EN7: Local Green Space and Public Open Space Policy EN8: Undesignated Open Space Policy EN9: Provision of Open Space Policy EN10: Access to Open Space Policy CR10b: Tall Buildings Policy CR12d: West Side Major Opportunity Area, Broad Street Mall

Table 3.1 Development Plan Policy Relevant to HTVIA

NATIONAL POLICY

3.7 The development plan is supported by the planning policies set out in the NPPF. The relevant provisions are set out at **Table 3.2**.

NATIONAL POLICY	KEY PROVISIONS
National Planning Policy Framework (NPPF) 2025	Chapter 12: Achieving well designed places Paragraph 131 Paragraph 135-139 Chapter 16: Conserving and enhancing the historic environment Paragraph 207 Paragraph 210 Paragraph 212-216 Paragraph 219

Table 3.2 National Planning Policy Relevant to HTVIA

MATERIAL CONSIDERATIONS

- 3.8 In addition to legislation and policy, the assessment will take into consideration relevant planning guidance and any material considerations, including:
- 3.8.1 National Planning Practice Guidance (online);
 - 3.8.2 Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013);
 - 3.8.3 An Approach to Landscape Character Assessment (2014);
 - 3.8.4 TGN 06/19 Visual Representation of Development Proposals Technical Guidance Note (2019) prepared by Landscape Institute
 - 3.8.5 Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)
 - 3.8.6 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017);
 - 3.8.7 Tall Buildings: Historic England Advice Note 4 (2022);
 - 3.8.8 IEMA, ClfA and IHBC (2021) Principles for Cultural Heritage Impact Assessment;
 - 3.8.9 St Mary’s Butts/Castle Street Conservation Area Appraisal (2008);
 - 3.8.10 Russell Street/Castle Hill Conservation Area Appraisal (2020);
 - 3.8.11 Market Place/London Street Conservation Area Appraisal (2007);
 - 3.8.12 Reading Borough Council Proposals Map (Adopted 2019);
 - 3.8.13 City Centre Framework SPD (2008);
 - 3.8.14 Readings Culture and Heritage Strategy 2015 to 2030 (2010);
 - 3.8.15 Reading Town Centre Public Realm Strategy (2024);
 - 3.8.16 Significant Views with Heritage Interest assessment (2018);
 - 3.8.17 Minster Quarter Area Outline Development Framework (2018);
 - 3.8.18 Tall Buildings Strategy (2008); and
 - 3.8.19 Reading Borough Local Plan Partial Update: Tall Buildings Strategy Update Note (2025)

POLICY DISCUSSION
HERITAGE

- 3.9
- In terms of heritage, RBC Local Plan Policy EN1 states that:
"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."
- 3.10
- Policy EN4 of Reading's Local Plan, in reference to non-designated heritage asset, states that:
"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."
- 3.11
- If the Proposed Development is held to cause harm to the significance of a designated heritage asset, such harm should be categorised as either less than substantial or substantial, and within each category the extent of harm should be clearly articulated. See National Planning Practice Guidance paragraph 18 which states that:
"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."
- 3.12
- The nature and extent of harm is important to ascertain because that analysis informs the balancing out of any harm under the terms of paragraph 208 of the NPPF.
- 3.13
- In either case, if the Proposed Development would result in harm to the significance of a designated heritage asset, great weight should be given to the asset's conservation (NPPF paragraph 205).
- 3.14
- Any harm to the significance of a designated heritage asset should require 'clear and convincing justification', as per NPPF paragraph 206. A clear and convincing justification does not create a freestanding test requiring the demonstration of less damaging alternatives. To the extent that there is a test, it is to be found in paragraph 207 (in the case of substantial harm) or 208 (in the case of less than substantial harm).

- 3.15
- As a matter of policy, heritage benefits also attract great weight in the planning decision making (and assessment process).
- 3.16
- We understand that if the decision maker follows the above approach, then this approach is consistent with the extensive case law which has emerged in relation to designated assets since the publication of the NPPF.

TOWNSCAPE AND VISUAL
TOWN CENTRE AND REGENERATION AREA

- 3.17
- The Site is located within Reading town centre. The extant development plan identifies the Site as being within the West Side Major Opportunity Area (Policy CR12). Reading Local Plan (2019) defines the overarching vision for this area as:
"The west side area will be a mixed-use extension to the west of the centre containing high-quality mixed use environments and fostering stronger east-west links into the central core."
- 3.18
- The West Side Major Opportunity Area Strategy comprises five subareas. The specific area in which the Site is located, is subarea CR12e: Hosier Street, separated from subarea CR12d: Broad Street Mall by Hosier Street, identified as a 'Ley movement corridor (pedestrian and/or cycle)'. The development plan describes subarea CR12e: Hosier Street as follows:
"Development on this site will result in a new residential community centred around an improved area of public open space and a high quality environment, with an improved entrance to the site from St Mary's Butts. The edges of the open space will be activated with retail, leisure and/or other main town centre uses such as hotel use, and development may also include some limited offices uses. The Hexagon theatre will only be developed if a replacement facility for Reading, expected to be in the same area, is provided, and approaches to the theatre will be improved. Development will also include a replacement site for the street market. The car parking below ground level will be retained and incorporated into the development."

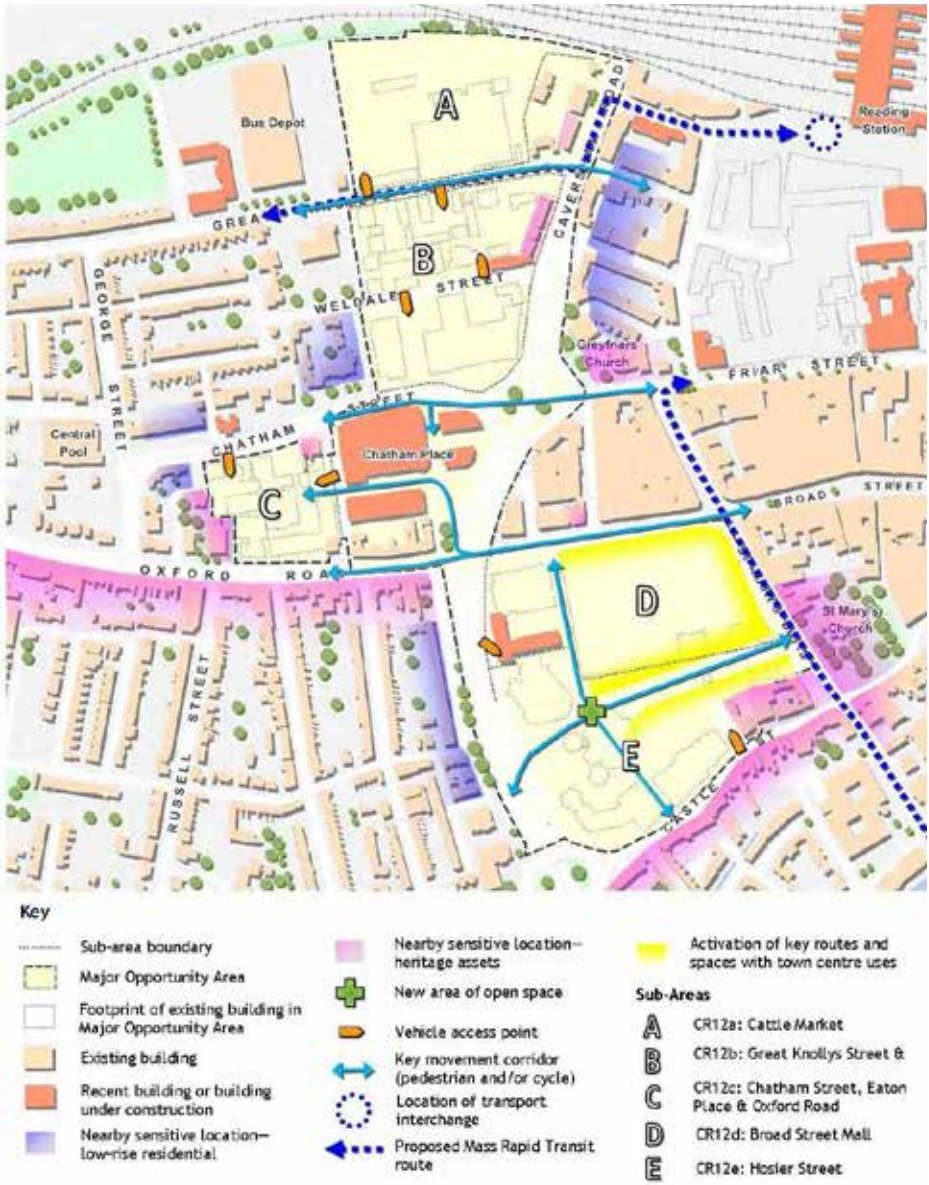


Figure 5.4: West Side Major Opportunity Area Strategy

Figure 3.1 Diagram of the West Side Major Opportunity Area Strategy with the Site labelled as 'E' (Reading Borough Local Plan)

- 3.19 The site has a size of 3.41 ha; the policy identifies an indicative potential of 500–750 dwellings and 4,000–6,000 m2 of retail and leisure.
- 3.20 It is evident that the Site is located within an area of evolving change and major regeneration. This context is important in the overall assessment of the Proposed Development.

DESIGNATED VIEWS

- 3.21 Verified views have taken into consideration the built and natural environment, the settings of heritage assets and the relationship to the existing townscape.
- 3.22 The Site is located within the setting of highly graded heritage assets including the Church of St Mary (Grade I) and Holybrook House (Grade II*). As such, the Proposed Development must have regard to Policy EN5 of Reading’s Local Plan which states:
- “New development should not harm and where possible should make a positive contribution to views of acknowledged historical significance.*
- 3.23 Policy EN5 lists nine views, which merit special protection. Local View 1 is taken from an elevated position in McIlroy Park, orientated towards Chazey Barn Farm, the Thames Meadow and the Chilterns escarpment. The viewing corridor is identified in the Development Plan and at **Figure 3.2**. The Site is outside of this viewing corridor (‘approximate extent of view’; however, it does feature in the wider skyline of Reading. Viewpoint 13 of this HTVIA aligns with the position of Local View 1 and is discussed as a representative view in **Section 10.0**. The AVR is provided at **Appendix 2.0**.
- 3.24 During the pre-application process, the Council requested that Local View 2 was tested. Local View 2 is positioned on Whitley Street, orientated northwards on Southampton Street towards the three spires of St Giles Church, St Mary’s Church and Greyfriars Church. The Proposed Development would not be visible in this view. A non-verified view is discussed in **Section 10.0** and provided at **Appendix 4.0**.

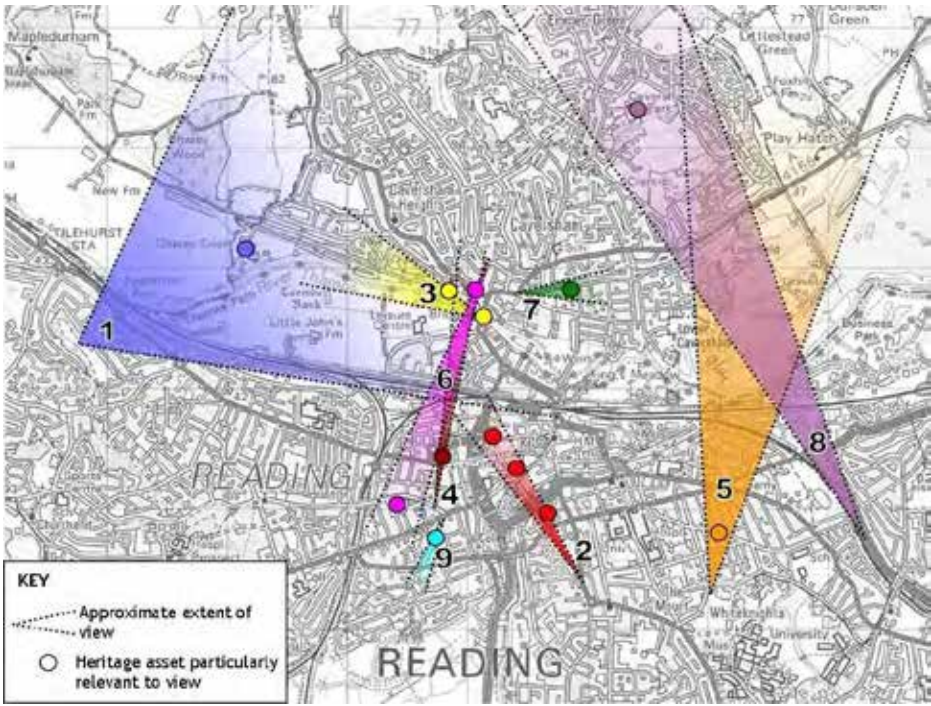


Figure 3.2 Plan showing identified local views and viewing corridors (Reading Borough Local Plan)

TALL BUILDINGS

- 3.25 Policy CR10: Tall Buildings of the Reading Local Plan defines tall buildings as:
- “10 storeys of commercial floorspace or 12 storeys of residential (equating to 36 metres tall) or above.”*

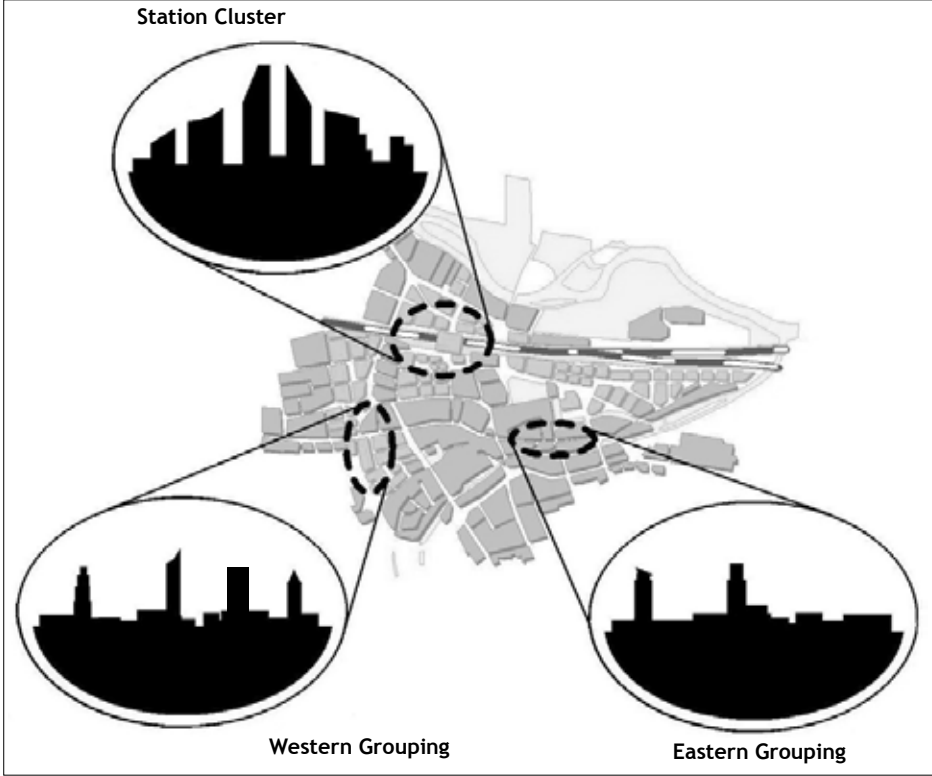


Figure 3.3 Diagrammatic indicative representation of the differing approach to tall buildings in each area (Reading Borough Local Plan)

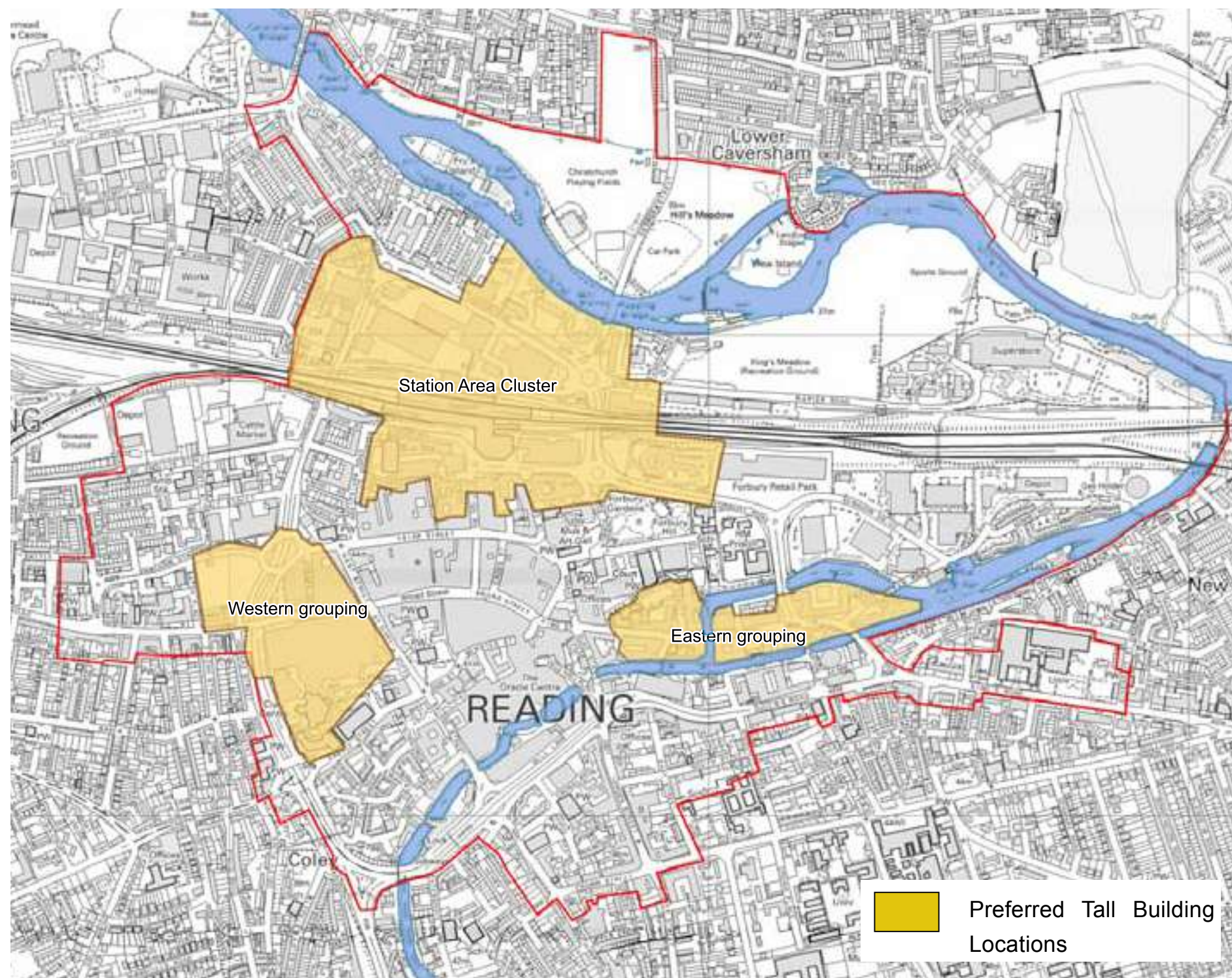


Figure 3.4 Map showing preferred locations for tall buildings (Reading Tall Buildings Strategy)

- 3.26 The Proposed Development proposes residential blocks of up to 16 storeys and is therefore considered a tall building.
- 3.27 The Site is located within an area identified by Policy CR10b: Western Grouping, as appropriate for tall buildings: *“A secondary cluster of tall buildings would be appropriate to create a distinctive grouping, to mark the area as the civic heart of Reading and a gateway to the centre.”*
- 3.28 As specified in the Reading Local Plan, tall buildings in this location should:
- *“Contribute to the development of a cluster of tall buildings that is clearly subservient to the Station Area Cluster;*
 - *Be generally lower in height than the tallest buildings planned for the Station Area Cluster;*
 - *Be linked to the physical regeneration of a wider area and should not be proposed in isolation;*
 - *Where buildings are to be integrated or front onto existing streets, include upper storeys of the taller structures that are set back from a base which is in line with the general surrounding building heights, particularly where the structure adjoins a conservation area;*
 - *Not intrude on the key view between Greyfriars Church and St Giles Church, and a view from the open space in the Hosier Street development to St Mary’s Church”*

- 3.29 In addition to these area-specific requirements, Policy CR10 further outlines that tall buildings should be of excellent design and architectural quality, and should:
- *“Enhance Reading’s skyline, through a distinctive profile and careful design of the upper and middle sections of the building;*
 - *Contribute to a human scale street environment, through paying careful attention to the lower section or base of the building, providing rich architectural detailing and reflecting their surroundings through the definition of any upper storey setback and reinforcing the articulation of the streetscape;*
 - *Contribute to high-quality views from distance, views from middle-distance and local views;*
 - *Take account of the context within which they sit, including the existing urban grain, streetscape and built form and local architectural style;*
 - *Avoid bulky, over-dominant massing;*
 - *Conserve and, where possible, enhance the setting of conservation areas and listed buildings;*
 - *Use high quality materials and finishes;*
 - *Create safe, pleasant and attractive spaces around them, and avoid detrimental impacts on the existing public realm;*
 - *Consider innovative ways of providing green infrastructure, such as green walls, green roofs and roof gardens;*
 - *Locate any car parking or vehicular servicing within or below the development;*
 - *Maximise the levels of energy efficiency in order to offset the generally energy intensive nature of such buildings;*
 - *Mitigate any wind speed or turbulence or overshadowing effects through design and siting;*
 - *Ensure adequate levels of daylight and sunlight are able to reach buildings and spaces within the development;*
 - *Avoid significant negative impacts on existing residential properties and the public realm in terms of outlook, privacy, daylight, sunlight, noise, light glare and night-time lighting;*

- *Provide managed public access to an upper floor observatory and to ground floors where appropriate, and ensure that arrangements for access within the building are incorporated in the design stage;*
- *Incorporate appropriate maintenance arrangements at the design stage. “*

3.30 As the Proposed Development comprises buildings defined as a tall building by the Development Plan, the requirements outlined above are relevant to an assessment of the proposals.

MINSTER QUARTER AREA DEVELOPMENT FRAMEWORK (2018)

- 3.31 The Minster Quarter Area Development Framework (2018) was drafted in parallel with the 2019 Local Plan and sets out the ‘*principles for promoting the development of the area to ensure a co-ordinated, high quality, comprehensive development creating a multi-purpose urban quarter in Central Reading*’. The framework area is bordered by the IDR to the west, Castle Street to the south, the Reading Minster Church Yard to the east, and Oxford Road and Broad Street to the north. The Site falls within the Minster Quarter Area.
- 3.32 The framework introduces four subareas: 1 – Hexagon Quarter, 2 – Minster Square, 3 – St. Mary’s Butts / Oxford Road, and 4 – Castle Street. The Site straddles both subarea 1 and 4. The description of subarea 1 is:
- ‘1 – Hexagon Quarter: Hexagon Quarter will be a distinctive, dense and high-quality urban quarter within Reading’s Central Core. The site will provide a unique character and sense of place that will be unified by a high quality public realm and seek to create an inviting new gateway to and from the Russell Street/Castle Hill Conservation Area and the residential areas of West Reading.’*
- 3.33 Subarea 4 is described as:
- ‘4 – Castle Street Buildings along the southern edge of Castle Street display a unique integrity of historic continuity in the town. As such this area is singled out as an independent character area requiring neighbouring buildings to step-down to maintain the existing street dimensions.’*

- 3.34 The framework details ‘*one possible way of developing the site*’, noting that ‘*the site could be developed in different ways. This framework does not prevent alternative layouts and forms of development subject to demonstrating compliance with relevant planning policies*’.
- 3.35 The framework suggests indicative building heights for the blocks across the masterplan area and proposes tall buildings on the Broad Street Mall site along the northern edge of the Minster Quarter.
- 3.36 The Broad Street Mall redevelopment proposal was granted planning permission in May 2025 (planning reference: PL/24/0173) and comprises three buildings, stepping from 19 to 26 and 30 storeys.
- 3.37 The framework suggests a series of development blocks south of the Hexagon and along Castle Street, recreating typical urban perimeter blocks and new public space to the east of the Hexagon.



Figure 20 INDICATIVE BUILDING HEIGHTS PARAMETERS

Figure 3.5 Diagram showing suggested distribution of heights and plat form for the proposals on Site (Reading Minster Quarter Framework)

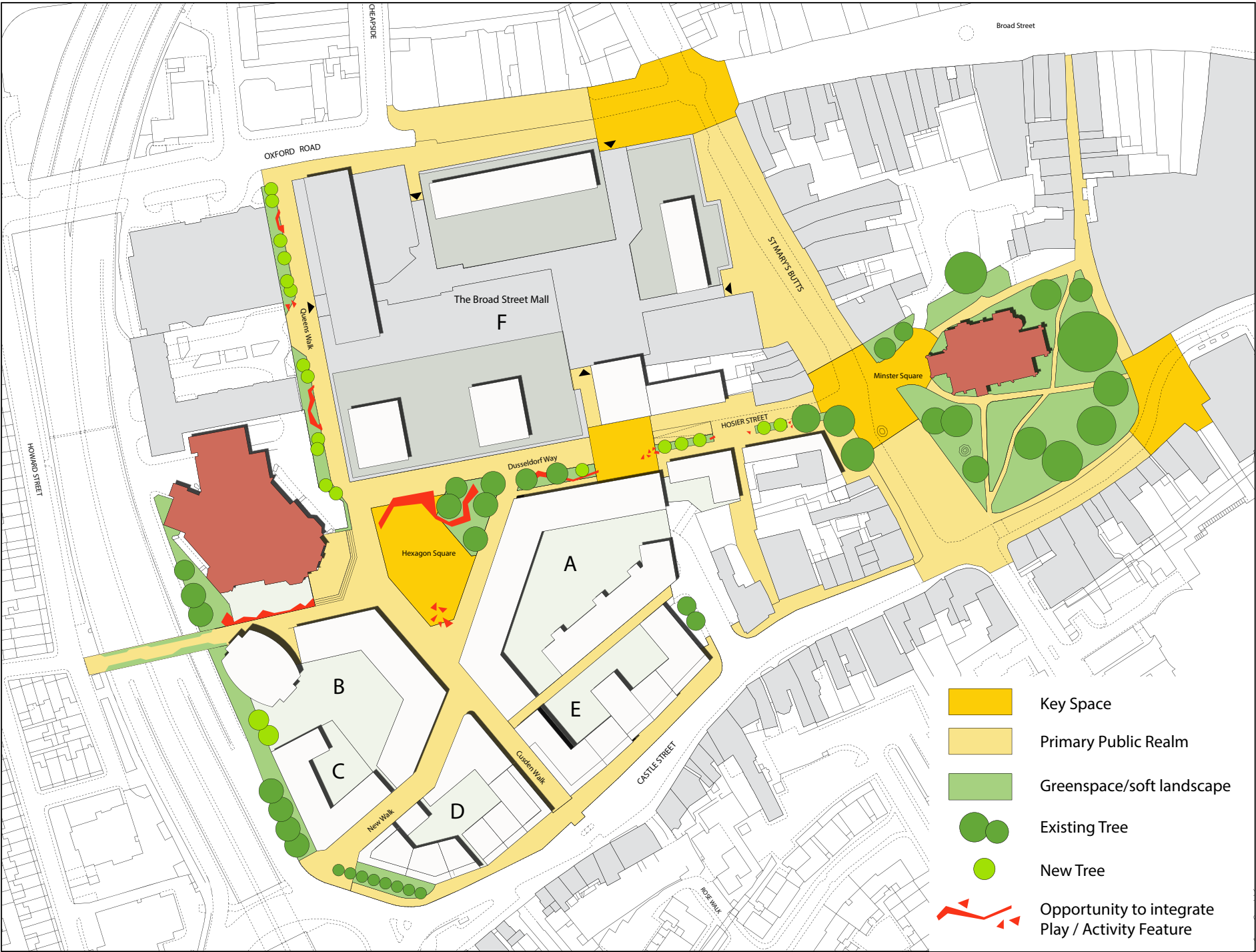


Figure 3.6 Plan of public realm aspirations for the Minster Quarter (Reading Minster Quarter Framework)

READING TALL BUILDINGS STRATEGY (2008)

- 3.38 The Site is located in *Character Area: 16 Civic Centre*, as identified in Reading Tall Buildings Strategy (2008). The document identifies that the area is suitable for tall building, due to an existing character of large-scale buildings. The document recognises the potential benefits of a tall building within the Civic Centre as providing structure and focus to the poor-quality townscape character of the area.
- 3.39 Consideration should be given on a case by case basis to how tall buildings would impact upon key views along West Street to Greyfriars Church and to how they would be views from, or impact upon views of St Mary's Church.
- 3.40 The Reading Borough Local Plan Partial Update: Tall Buildings Strategy Update Note (2025) maintains that the Character Area 16: Civic Centre remains suitable for a tall building, noting that the Civic Offices have now been demolished.

EMERGING LOCAL PLAN UPDATE

- 3.41 The Council agreed in March 2023 to undertake a partial review of its adopted Local Plan (2019),
- 3.42 Following the publication of the new NPPF in 2021, the Council undertook a review of the 2019 Local Plan, concluding that a partial update of the Local Plan's policies was required. Consultation was undertaken under Regulation 18 and 19 and the Local Plan Partial Update submitted to the Secretary of State in May 2025
- 3.43 The 2021 revision of the NPPF included updates in relation to local housing needs, population growth and updates to the standard methodology for calculating housing needs, pertinent to urban centres including Reading. The Partial Update Draft reflects the introduction of the National Design Guide.
- 3.44 The Council's review identified the need to make policy CR12: West Side Major Opportunity Area a 'strategic policy' in line with national and local policy changes. The indicative potential of dwellings increased from 500-750 to 650-970. The policy text states that '*Hosier Street represents a significant opportunity for a major residential led-regeneration that will improve public realm across the area*'.

4.0

BASELINE: HISTORICAL DEVELOPMENT

FLINT STREET - 53 CASTLE STREET, READING, RG1 7TH

BASELINE: HISTORICAL DEVELOPMENT

4.1 This section provides a description of the historical development of the Site and that of the surrounding area. The section and the heritage baseline at **Section 5.0** have been informed by secondary sources, including:

- The National Heritage List for England maintained by Historic England;
- Reading Borough Council, St Mary’s Butts/Castle Street Conservation Area Appraisal (2008);
- Reading Borough Council, Russell Street/Castle Hill Conservation Area Appraisal (2004);
- Reading Borough Council, Market Place/London Street Conservation Area Appraisal (2021);
- Reading Borough Council, Register of Locally Listed Buildings;
- The Historic Environment Record (‘HER’);
- Bridget Cherry and Nikolas Pevsner, The Buildings of England: Berkshire (2010);
- David Nash Ford, Royal Berkshire History: Reading, Biscuits, Bulbs & Beer.

HISTORICAL DEVELOPMENT OF READING

4.2 By the 11th century, Reading was an established urban settlement at a strategic crossing over the River Kennet and north–south, east–west crossroads. The church now known at the Church of St Mary (Reading Minster) would have been at the centre of this original settlement, however after the founding of Reading Abbey by Henry I in 1121, the urban centre of the settlement moved away from St Mary’s and Castle Street towards the Abbey in the north–east.

4.3 As one of the largest monasteries in England, Reading became a place of pilgrimage, and a new market was established by the Abbey from the 13th century. The town grew in prosperity due to its successful silk, wool and leather trades. John Speed’s 1610 map of Reading at **Figure 4.1** shows Reading as a small settlement to the north of the river Kennet, bound to the north by Gutter Lane, now known as Friar Street, and Reading Abbey to the east. The 17th century map illustrates ribbon development extending beyond the medieval core, following Castle Street to the west and Shoemakers Row, now known as London Street, to the south. The irregular street pattern of this medieval core is still discernible around Broad Street.

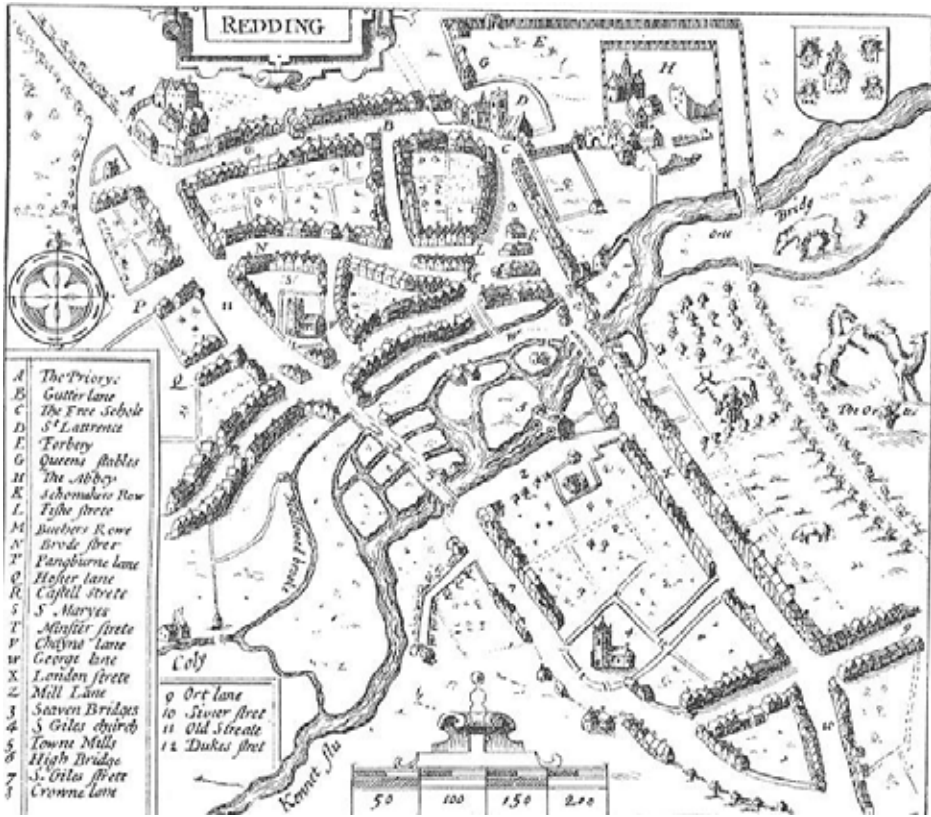


Figure 4.1 1610 John Speed’s Map of Reading (Source: Berkshire History)

4.4 Despite early prosperity, Reading remained within its medieval boundaries until the end of the 18th century as a result of decline in its textile industry and the aftermath of the Civil War. In the 19th century Reading began to prosper again as a market town, as a result of improved trade and transport links, and flourishing industries.

4.5 By the end of the 18th century, several turnpikes converged at Reading, making it a popular stopping place and Thames River crossing, particularly between London in the east and Bristol or Bath in the west. Consequently, there were a great number of coaching inns in the town. An example of this survives at the Grade II listed George Hotel, 2–4 King Street.

4.6 In the 19th century, Reading was connected to other cities by canal and rail. By 1810 the 87–mile Kennet and Avon Canal was completed, providing a waterway from the Bristol Channel to Reading, where the River Kennet joins the River Thames towards London.

4.7 In 1841 the Great Western Railway superseded the canal system, connecting Reading to London by rail. Reading was made further accessible by South Eastern Railway and South Western Railway, in 1849 and 1856 respectively.

4.8 Reading expanded rapidly in the 19th century, spreading out from the medieval core to the west, south and east. Between 1850 and 1900, the population of Reading increased from 21,450 to 72,000. This expansion can be traced in the linear street pattern of Victorian and Edwardian suburbs, particularly along Oxford Road in West Reading and London Road in East Reading, and New Town.

4.9 In the 18th century, malting and brewing were prominent industries. Simond’s Brewery was founded in 1785 and later came to occupy a large riverside site with brewery buildings designed by Sir John Soane. The brewery complex was demolished and the Oracle shopping centre constructed on the site, opening in 1999.