

NAPIER COURT READING RG1 8BW

**NOTE OF ADVICE RE. CHARACTER AND
APPEARANCE (INCLUDING HISTORIC
ENVIRONMENT CONSIDERATIONS)**

SEPTEMBER 2025



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1.0 INTRODUCTION

1.1 I am instructed by Peveril Securities. They (hereafter 'the Applicant') have submitted a full application for planning permission to Reading Borough Council (hereafter 'the Council'), under the local authority reference **PL/24/0846**.

1.2 The description of development as set out on the application form is:

'Demolition of existing buildings and erection of new buildings of 11 storeys, to provide 570 build to rent residential dwellings (Class C3) with residential amenity space, parking, landscaping and associated engineering works.'



Figure 1.1 CGI Render of Proposals.

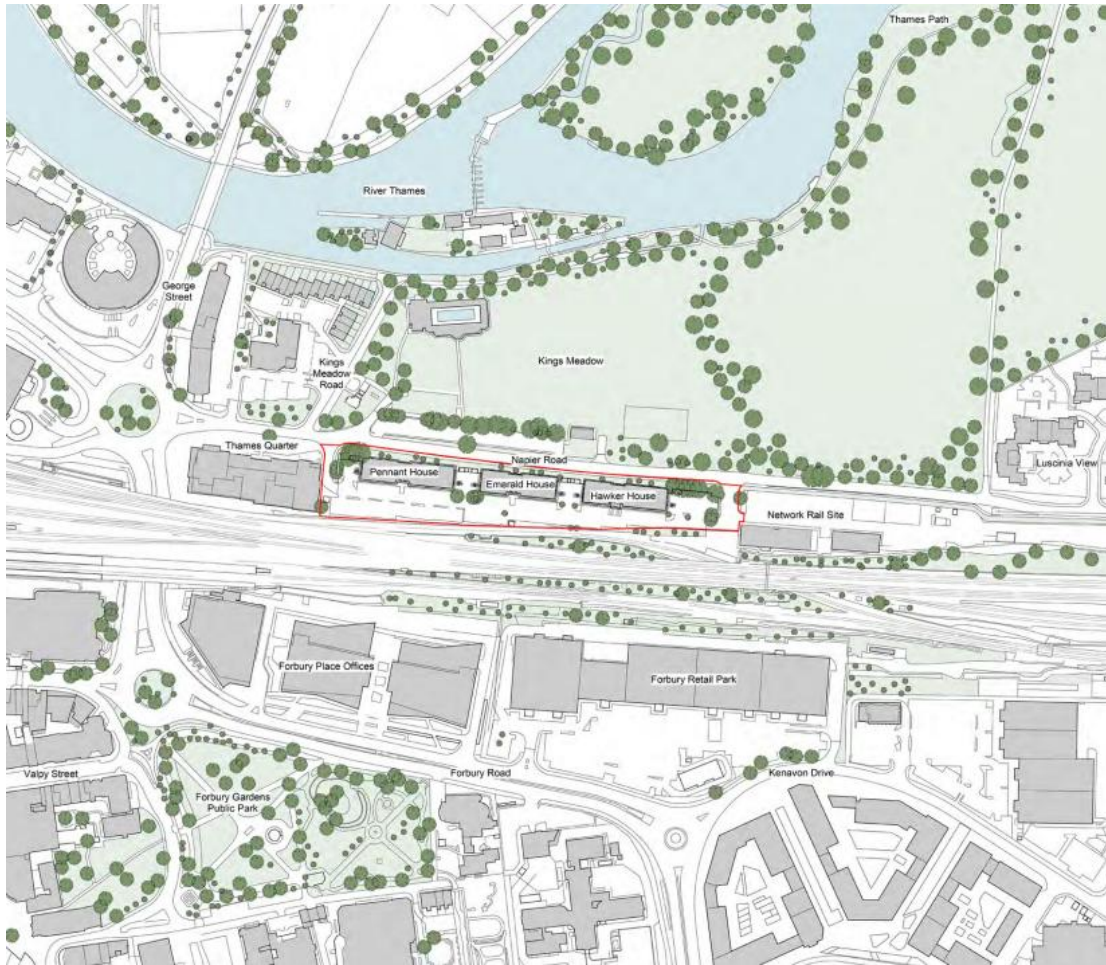


Figure 1.2 Site Plan, red line submitted for planning, as existing

- 1.3 Instructing solicitors, Freeths, first contacted me in connection with this site by email of 19 June 2025 and to ask whether I was able to carry a peer review of the above proposals, which have been subject to extensive pre application discussion with the Council.
- 1.4 That review, the email explained, was to look at design and heritage matters (character and appearance). Subsequently, I was asked to comment on the Council's allegation of overdevelopment or cramped layout and to review an updated set of comments from the Conservation Officer (which are not dated but were supplied to me in August).
- 1.5 I was subsequently supplied with a full set of application documents, email correspondence with the Council, and consultation responses relating to these topics.
- 1.6 Of particular relevance to my instruction are the DAS, the DRP reports, the Townscape and Visual Impact Assessment (TVIA), the Heritage Impact Assessment (HIA), the application drawings and the planning statement. I acquainted myself with those policies in the Reading Borough Council Local Plan 2019 (hereafter 'the development plan'). This contains both development management policies and site allocations (including allocation CR11i, which includes the site and Network Rail land to the east (hereafter 'the allocation').
- 1.7 At the time of my instruction, the submitted drawings were in the process of being amended and also the supporting visuals (architect-prepared CGIs). I was advised of the changes contemplated and understand the rationale for them (and the intention of responding to detailed points from the DRP). I have since been sent the final amended scheme drawings, and these form the basis of my advice.

- 1.8 Finally, after my first site view I asked for a meeting with the appointed landscape architects better to understand the proposals for the Napier Road frontage, within the red line, and the scope for landscape works within the Kings Meadow.
- 1.9 After that site visit, I was also advised that it would be helpful for a landscape expert in my team to review the evolution of the Kings Meadow to understand whether there was any readily available documentation which evidenced the landscape intentions for that space. Accordingly, we produced an illustrated report explaining how the Kings Meadow evolved over time, including along its boundary with Napier Road. I reproduce this report as my **Appendix 5.0**.

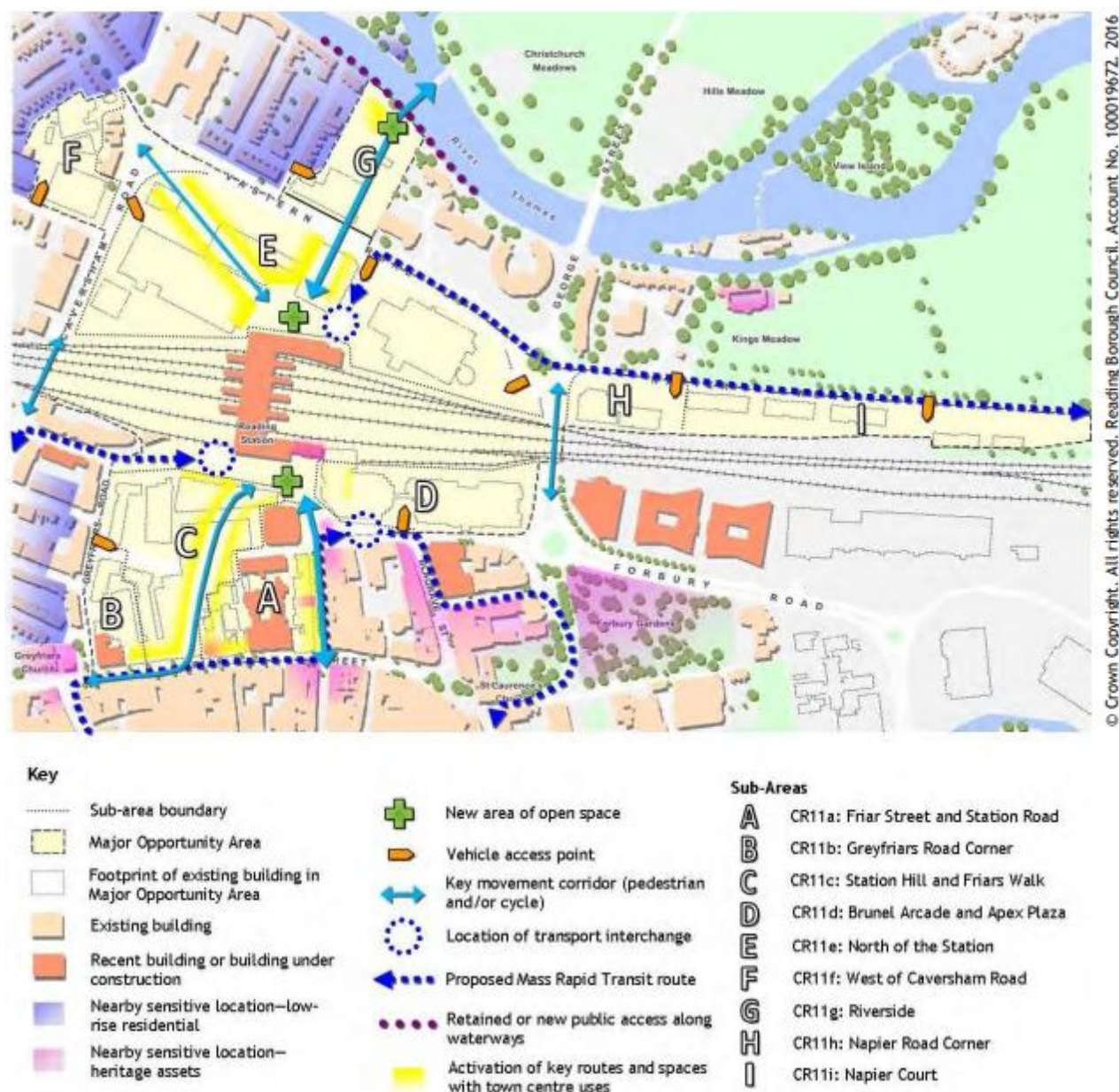


Figure 1.3 Site Allocation CR11i from the local plan. The Site under consideration comprises little more than half of 'I'.

- 1.10 I and my assistant (Ms Harriet Suter) attended a meeting with a representative of the applicant, instructing solicitors and the scheme architects on 3 July to discuss the scope of my instruction.

- 1.11 I visited the site on 11 July, in sunny conditions, and the relevant viewpoints (here comprising TVIA 1, 2, 3 and 4), and then a second time, to review the amended scheme information, on 13 September. I visited Reading again on Tuesday 9 September and specifically to consider the alleged impacts of the proposals on the setting, and significance, of important heritage assets to the south of the railway and associated with the historic Abbey site (which includes the Victorian jail, comprising several listed structures).

2.0 STATEMENT OF EXPERTISE

- 2.1 I am a chartered town planner and full member of the Institute of Historic Building Conservation. I have more than thirty years of experience advising on the interaction of new development with sensitive land (including heritage assets).
- 2.2 I am a senior and owning partner at Montagu Evans LLP (registered address: 70 St Mary Axe, London EC3A 8BE). There I have built a team of c. 25 professionals advising on planning, heritage, design and visual impact. That team forms part of our planning department (c. 100 professionals).
- 2.3 I have an academic background (PhD in the history of architecture and urban planning) and after lecturing in the USA, I settled in the UK and joined English Heritage (Historic England) in 1991. I entered private practice in 1998, and worked as a director at Alan Baxter and Associates, senior planning director at RPS Planning and then a partner on Montagu Evans, which is a property consultancy (chartered planners and surveyors).
- 2.4 I have advised on many large-scale regeneration projects involving tall and very tall developments and I was a principal author of the London View Management Framework, acting as a consultant to the Greater London Authority. This SPD to the London Plan manages 25 strategic views in and across London.
- 2.5 Current instructions include: Earls Court, for the Earls Court Development Company, a very large regeneration site in an Opportunity Area in west London; Lewisham Shopping Centre, for Land Securities; the redevelopment of the Whitgift Centre, for URW (a Paris based consortium); the former GSK Headquarters Building in the Great West Road, Hounslow, for Hadley Properties. This is in addition to many single building tower schemes (101 Whitechapel, Tower Hamlets; 225 March Wall, Tower Hamlets; 55 Bishopsgate, City of London).
- 2.6 I also advise on projects involving very important heritage assets, for example, the British Museum where I have been advising on major developments for nearly 20 years, the South Bank Centre (including the Royal Festival Hall), and, for HM Government/Cabinet Office, the National Holocaust Memorial and Learning Centre, which abuts the Westminster World Heritage Site.
- 2.7 Many of my projects are like the present one I am considering on land identified for intensification through development plan documents, and my work regularly involves me in assisting clients in allocations at Reg 18 and Reg 19 states of the local plan process.
- 2.8 I do a great deal of expert work, mostly in section 77 and 78 call-ins and appeals, for example, recently, the Brighton Gasworks Appeal for Berkeley Homes (a c. 450 dwelling scheme on former industrial land; allowed on appeal, APL Reference: APL2024/00086) and the Stag Brewery in Richmond (a 950 dwelling scheme by the Thames and adjoining and partly in a conservation area and in the setting of various listed buildings; allowed on appeal, APP Reference: APP/L5810/W/24/3339060). Another recent decision is in respect of an allocated site, and for development of a comparable scale and density to the present one is on the Waitrose John Lewis site at West Ealing Station (consented, see APP 233076FUL).
- 2.9 I have discharged a number of instructions in Reading over the years, most notably the Aviva development at 55 Vastern Place (see SOS decision at APP/E0345/W/21/3289748). I also advised on the early stages of the McLaren Development, before passing this to a junior partner. I understand this is subject to a resolution to grant. I am presently advising JLP on its warehouse site on Letcombe Street

in Reading, and I have advised on two other sites in the east of the town centre (Royal Heights and Gas Holder's Site, Kenavon Drive).

- 2.10 One of my partners is promoting the Forbury Retail Park scheme, on the other side of the main line railway. We are providing planning and heritage/townscape advice on that site. I have no involvement in that instruction, subject to a live application, and I have not discussed the matter with my colleagues working on that site.
- 2.11 I confirm here that I have no other instructions, either recent or current, with the applicant or any of its subsidiaries.

3.0 THE QUESTIONS I AM ASKED

- 3.1 Instructing solicitors confirmed the questions I am asked to answer, and comprising my instructions, in an email of 4 July. Those questions are:
- 1 Whether, in your opinion, the proposed design of the scheme is an appropriate and acceptable design response for the Site, having regard to its wider townscape context and relevant design policy (national and local); we would request that you specifically address the terms of Policy CR11i of the Reading Local Plan and the position which has been expressed by planning officers regarding the 'stepping down' of the building, along with any other matters which you consider to be material to your opinion.
 - 2 Whether, in your opinion, the proposed development would result in any harm to designated heritage assets and if so, what you consider any impact to be; in this respect we request that you also specifically address the comments set out in the consultation response from the Council's conservation officer, along with any other matters which you consider to be material to your opinion.
 - 3 Having regard to questions 1) and 2) above and any other matters you consider relevant to the issues of design and heritage, what are the prospects of success at appeal in your opinion?
 - 4 And then additionally, I was invited to consider two further matters.
 - 5 The first of these was to comment on the Council's allegation of poor layout, as relayed to me by email from instructing solicitors and reads: *Cramped arrangement on site/overdevelopment, leading to inadequate opportunities for meaningful mitigating landscaping of the development and a failure to provide defensible/suitable outlook to ground floor habitable rooms.*
 - 6 Second, I was asked to consider whether the landscape proposed within the site would be attractive seen in association with the buildings, introducing amenity and human scale. This was in response to comments from the Natural Environment Officer who expressed concern that the planting proposed would not 'soften' the building elevations effectively. The officer does not consider that any new tree planting on the Kings Meadow would have any bearing on this point.
- 3.2 For completeness I reproduce the email comprising my formal instructions as **Appendix 1.0** to this note. I have summarised the content of later emails expanding that initial instruction.

4.0 SUMMARY OF ADVICE IN ANSWER TO THE QUESTIONS PUT TO ME

QUESTION ONE

4.1 I conclude that the proposals meet the terms of CR11i for the following reasons:

- 4.1.1 For reasons explained in this advice note, I conclude the proposals comprise high quality design suitable to context, and specifically cause no harm to the visual amenity of the adjoining part of the Thames Valley Major Landscape Feature, the Kings Meadow.
- 4.1.2 In forming my views, I do not take into account the potential for additional tree planting on the southern edge of the Kings Meadow, which would be funded through a contribution made by the development. Such a scheme would deliver a direct enhancement to this well used public open space and so meet the terms of EN13 of the local plan.
- 4.1.3 I conclude that the policy criterion requiring a taper from west to east does not have to be achieved within the Application site which comprises slightly more than half of the allocation which is subject to the policy.
- 4.1.4 The policy as drafted does not require a particular gradient or line of taper between defined points. Neither have I found any analysis in the evidence base to the local plan which explains why this is desirable from an urban design or density perspective, or indeed from any heritage perspective.
- 4.1.5 Even if a different view is taken, and contrary to my analysis, there is such a line requiring step down across the site, then that in itself would present only a limited conflict with the development plan.

QUESTION TWO

4.2 The proposals preserve the setting of the grade II listed Lido, located about 90 meters north of the site (at the nearest point).

4.3 This is my clear finding for the following reasons:

- 4.3.1 There is a significant separating distance between the proposals and the Lido, and the proposals are set peripheral to views from parkland east and south of the Lido. These are the positions from which one can admire its form, materials and silhouette.
- 4.3.2 The significant setting of the Lido is Kings Meadow. The mature trees to the east and north of the Lido form part of that setting, and new tree planting to the south and east south east of the listed building are intended to provide a more intimate setting for the building over time.
- 4.3.3 Mature trees originally enclosed to the setting to the south, separating Kings Meadow and the Lido from the site, which was formerly railway land (an intrusive use from which the open space and bathing facilities were deliberately separated).
- 4.3.4 The architectural detailing of the Lido is best appreciated from close quarters, and from those positions the proposals are behind the viewer.
- 4.3.5 The main architectural interest of the Lido is comprised of its internal courtyard which is galleried. The spatial character provided by the scale of the courtyard and surrounding buildings is an important aspect of its special interest and this is not affected by the proposals.
- 4.3.6 The Lido is already experienced in the context of modern, larger development which is set more prominently relative to its setting than the proposals, and the landscape around the historic building provides an effective buffer along with the separating distance from the modern development. Accordingly, I conclude the proposals do not harm the ability to appreciate the

architectural or historic significance of the listed Lido. This finding is consistent with that of the submitted HIA and the March 2025 further response which was prepared by the same consultants.

- 4.3.7 The Conservation Officer's response does not explain what attribute of the Lido's architectural or historic significance is harmed by the proposal. The response appears to identify harm from an increase in building form/visibility, which is not the test in statute or policy.
- 4.3.8 The Conservation Officer's response identifies harm to the listed building as a consequence of harm to its setting.
- 4.3.9 The Conservation Officer concludes that there would, in addition, be harm to the important heritage assets to the south of the railway, beyond the Forbury Road site, and comprising Reading Abbey, a Scheduled Monument, and associated listed buildings including Reading Gaol.
- 4.3.10 I conclude that the railway, interposing development, distance and the potential for limited visibility at most would mean that the ability to appreciate this important asset grouping would be unharmed. Accordingly, their architectural and historic significance will be preserved as required by statutory and policy requirements. This is also the finding of the Heritage Impact Assessment supporting the application.

QUESTION THREE

- 4.4 I have not identified other matters warranting comment in the discharge of my instruction.

ADDITIONAL QUESTIONS: CRAMPED LAYOUT AND LANDSCAPE TREATMENT OF THE NAPIER ROAD BOUNDARY INSIDE THE RED LINE

- 4.5 In relation to the first of these additional questions, on cramped layout, I conclude as follows. I conclude that the building is set back from the red line and the outlook from the apartments is acceptable. I note that the recent amendments have increased certain window sizes to improve the amenity of these units.
- 4.6 In relation to the second of these additional questions, on landscape in Napier Road, and within the red line, I conclude that the setting back of the building from the red line and pavement, and the inclusion of green landscape, mean the proposal will not overbear on the experience of pedestrians. In forming this view, I take into account also the details of the proposals, which are attractive and provide a human scale to the experience of pedestrians. It is also relevant that the outlook for pedestrians and residents on this side (on the lower floors) includes the wide expanse of the Kings Meadow which is another relevant consideration leading me to conclude the layout is not cramped.

5.0 THE CONTEXT FOR THIS ADVICE

- 5.1 I am instructed that the Applicant understands that officers cannot support the proposals and that, if the scheme were to go to a committee, then this would be with a recommendation to refuse consent.
- 5.2 I base my advice on two emails which set out the Council's concerns about the application both from the principal planner, Mr Matt Burns. One is dated to 16 October 2024 and the other to 28 July 2025. The latter lists, from the same officer, identifies 8 considerations said 'to weigh heavily against the proposals in the planning balance'.
- 5.3 I summarise the two relevant ones from that later email below:
1. Overdevelopment, resulting in excessive scale and massing viewed in the context of Napier Road and Kings Meadow (TVMLF) which is exacerbated by inadequate or poor detailed design and landscape, and
 2. Cramped arrangement on the site/overdevelopment leading to inadequate opportunities for mitigating landscape and poor outlook from ground floor habitable rooms.
- 5.4 The officer's 28 July email reserves his position on the final wording and areas of concern that will feature in the reasons. I note that neither advice note identify heritage impacts as a freestanding area of concern.
- 5.5 I understand that, subject to my findings, that the Applicant is intending to show this advice, and other advice, to representatives of the Council in the hope of obtaining a local consent.
- 5.6 My instructions are to prepare this advice only, and I have not been invited to make an offer of expert witness services should the Applicant, having obtained a refusal, exercise its right of appeal.
- 5.7 Accordingly, this note is prepared as an independent opinion, and on the basis that it would feature in any appeal hearing. The signed affirmation concluding this advice note confirms it has been prepared in line with the duties of an expert advising a Tribunal should the Application be refused and I am invited to act as an expert witness at an Appeal (which I assume would be heard by public inquiry).
- 5.8 These duties include, amongst other things, that I am not paid on any contingency or success basis, and that I have disclosed all facts known to me and any potential conflicts of interest. This affirmation confirms, likewise, that the opinions expressed in this advice are my true and genuine professional opinions.

6.0 THE COUNCIL'S POSITION – CHARACTER AND APPEARANCE

6.1 As noted the officer concerns are set out in two communications. I start with the first, dated 16 October 2024 (see **Appendix 2.0**).

6.2 This email contains a substantive analysis of the Council's concerns about design (including height, scale, bulk and appearance) on the character and appearance of the area and with reference to policy.

The July 2025 Officer Note

6.3 The officer does not object in principle to the proposed density but instead has concerns about the effects from the proposed density.

6.4 I summarise the impacts of the development which the officer uses to support his findings. I return to these in this advice note.

6.4.1 The site is edge of centre, where there is a change in character towards the flat and open landscape of the TVMLF (Kings Meadow) and lower scale buildings (the Lido and Caversham to the north of the river). The officer notes the listed status of the Lido but does not allege harm to its setting (which the conservation officer does – discussed later).

6.4.2 Accordingly, a lower and less dense form of development is required to effect an acceptable transition, respecting the character and appearance of the area.

6.4.3 The officer interprets the policy guidance requiring development to taper from west to east as intended to respect that setting consideration. As a matter of fact the policy does not explain why it seeks a taper. Neither does it identify the points between which a development should taper (though the adjoining Thames Quarter is one such obvious point).

6.4.4 The design is criticized as not reflecting the detailing of the mansion block typology which the DAS states was the source of inspiration for the scheme. The blocks lack, the officer says, sufficient detail to warrant being called mansion blocks.

6.4.5 There is an additional criticism of the appearance of the buildings, which are said to have repetitive detailing and to lack 'imagination', particularly bearing in mind their position on the Kings Meadow.

6.4.6 Scale and appearance, and the block spacing and footprint, taken together, are said to lead to an 'overly dominant' form, providing an 'abrupt and stark barrier to the Kings Meadow open space'.

6.4.7 This note advises the Applicant that the proposals will not gain officer support in a report to the Planning Committee.

6.4.8 I have cited already the two topics falling to me and which would form the basis of reasons for refusal. As noted there is a general charge of harm to the character and appearance of the area arising from excessive height and scale, linked to the appearance of the buildings. The second topic relates in more general terms to the amenity of future occupiers and particularly on the ground floor and in views to the rear.

7.0 THE COUNCIL'S POSITION – HISTORIC ENVIRONMENT

- 7.1 The Council's conservation officer has objected in principle and explains the reasons for that in an undated consultation response which I reproduce as **Appendix 3.0**.
- 7.2 His first note identifies a moderate to low level of less than substantial harm to the significance of the listed lido, and no harm to any other asset.
- 7.3 The Conservation Officer's observations are very detailed, and I will return to these in the concluding section of this note, where I discuss the allegation of heritage harm.
- 7.4 The allegation of harm is expanded in a later undated memo to include the very important asset grouping to the south of the railway and Forbury Road and comprising the scheduled remains of Reading Abbey and associated historic buildings (including those comprising Reading jail). This allegation of harm is set out in a single sentence in the concluding paragraph and without any analysis at all, except to note the low level of less than substantial harm the officer identifies is also identified in the submitted Heritage Impact Assessment. That document finds to the contrary in respect of these assets, namely that there is no harm.

8.0 THE DEVELOPMENT PLAN AND MATERIAL CONSIDERATIONS

- 8.1 The development plan contains development management policies on design, character and appearance and heritage, under section 4.2 of the development plan.
- 8.2 I draw attention to the following design policies for detailed analysis on the basis they are relevant or potentially relevant to the questions I have been asked:
- 8.2.1 EN7, Local Green Space and Public Open Space, which identifies Kings Meadow. This policy aims to protect the amenity of these spaces in general terms.
- 8.2.2 EN13, Major Landscape Features and Areas of Outstanding Natural Beauty. This identifies Kings Meadow as part of the Thames Valley Major Landscape Feature.
- 8.2.3 CR2 is a general design policy for the central area (within which the Site is located) formulated with reference to other land use objectives and certain characteristics which are defined in the introduction to the area specific policies.
- 8.2.4 The suite of policies applying to development in Central Reading, and in particular CR11, on the Station/River Major Opportunity Area in which the site is located.
- 8.2.5 CR11i, for Napier Court, which includes the subject site and an area of land to the east. The whole of the allocation is shown on figure 5.3 of the plan, which I reproduce at **Figure 1.3** above. The subject site forms, roughly, half of the allocation in terms of extent (and slightly more in terms of area).
- 8.3 The local plan does not cite any evidence base documenting the character of the city or this part of it. I note this because the CR11i contains a policy that specifies a reduction in massing across the whole of the allocation, from west to east.
- 8.4 The central area policy set does include one policy, CR9, which requires new development to respect the character of traditional terraced housing in certain locations in the central area. None of these are identified as limiting the potential massing on the site.
- 8.5 I consider the heritage impacts against the policies in the National Planning Policy Framework, NPPF. The development plan policies are similar, and in my experience an Inspector would formulate his or her analysis with reference to the NPPF, the Planning Policy Guidance note on the conservation of the historic environment and best practice guidance (notably the Historic England setting Guidance, HEAN3).

9.0 POLICY DISCUSSION

EN7 LOCAL GREEN SPACES: KINGS MEADOW

9.1 EN7 seeks to protect the undeveloped nature of the identified open spaces, including Kings Meadow.

9.2 The policy also states this:

...Proposals that would result in the loss of any of these areas of open space, erode their quality through insensitive adjacent development or jeopardise their use or enjoyment by the public, will not be permitted.

9.3 The supporting policy text, paragraphs 4.2.25 to 4.2.29, considers the functional benefits of these spaces as distinct from their visual amenity, and that is, in my opinion, the focus of the policy.

9.4 The policy wording is, however, broadly drafted and so does reasonably cover matters of visual amenity (erosion of their quality through 'insensitive adjacent development').

9.5 I note the policy is binary in drafting and does not allow balancing of benefits against harm.

9.6 Footnote 41 to page 44 of the local plan refers to an assessment of all Local Green Spaces against the NPPF criteria, which it cites.

9.7 The relevant criteria in the 2025 NPPF are the same as the NPPF in force at the time of the Local Plan's adoption. These are set out at paragraph 106 which states:

The Local Green Space designation should only be used where the green space is:

- 1 in reasonably close proximity to the community, it serves.*
- 2 demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.*
- 3 local in character and is not an extensive tract of land.*

9.8 The live link in the local plan does not function and I have not been able to find the Local Green Space Assessment.

9.9 In summary, then, I conclude that the reference to amenity in this policy relates mostly but not exclusively to the functional purpose of the Local Green Space.

EN13: MAJOR LANDSCAPE FEATURE (THAMES VALLEY)

9.10 More salient are the provisions of EN13 which seeks to protect major landscape features. This policy states:

Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature. The following areas, as shown on the Proposals Map, are defined as Major Landscape Features... The Thames Valley ...

9.11 This policy is again, like EN7, binary.

9.12 Explanatory text at 4.2.65 states:

Reading is primarily an urban area, but it benefits from a number of natural features that have remained largely undeveloped. The urban context means that the preservation of these features as a backdrop is of particular importance. New development should seek to maintain and enhance the natural beauty and visual amenity of the identified major landscape features. The extent to which new development prevents or minimises the visual impact on major landscape features and other landscape values is largely dependent on the location, design and scale of proposals. ...

9.13 I have not located any published appraisal of the quality of the TVMLF or of this part.

9.14 The TVIA identifies Kings Meadow as part of the TVMLF, as Townscape Character Area 23, whose characteristics it describes at paragraphs 5.26 and following:

5.26 A large character area north of the Site and adjoining Napier Road.

5.27 Key characteristics include:

- *Recreational ground and river meadow land uses.*
- *Few buildings e.g., Lido building.*
- *Large expanse of meadows creates a large townscape scale.*
- *The Christchurch Bridge is a new prominent landmark on the Thames.*
- *Well maintained recreational resource.*
- *Open views within the character area of bankside tree planting.*
- *Key views into the TCA from elevated Caversham Park, Ballmore Park and Horse Close as part of the view of central Reading.*

5.28 Kings Meadow is designated Local Green Space with local biodiversity value that contributes positively to the character of the town, although not covered by any other designation related to landscape quality [excepting the TVMLF, which is not discussed at length in the TVIA – my emphasis]. Overall, the value is considered medium. The susceptibility to indirect change resulting from the type of proposed development including the increase in scale and massing is judged to be medium. The sensitivity of TCA 23 is therefore considered to be medium overall.

9.15 I reach a different view on the value of the landscape quality of the Kings Meadow to that in the TVIA. This is of course a matter of professional judgment, and although I reach a different conclusion, that does not invalidate the assessment in the TVIA.

9.16 In my opinion the Kings Meadow is a high-quality landscape with many very attractive groups of trees and individual specimens. These divide the meadow into smaller areas which are well proportioned. Trees also play an important role in mitigating the effect of surrounding development on the amenity of the Kings Meadow. In the language of TVIA, I think the 'value' of the open space is high and not medium as the TVIA finds.

9.17 I have also note that the TVIA does not draw attention to the degraded condition of the southern boundary of the Kings Meadow along the edge of the car park and opposite the site beyond to east. This boundary is manifestly poor and capable of enhancement.

CR2: DESIGN POLICY FOR THE CENTRAL AREA

9.18 This design policy applies generally accepted principles of good urban design to the particular planning requirements and characteristics of the central area.

- 9.19 The criterion of particular relevance to the question I am asked is limb a which requires new development to achieve "*continuity and enclosure through appropriate relationships between buildings and spaces...*".

CR11: STATION/RIVER MAJOR OPPORTUNITY AREA

- 9.20 This general policy combines land use and design policies.
- 9.21 Limb vi) requires development "*to give careful consideration to the areas of transition to low and medium density residential [areas] and conserve and, where possible, enhance listed buildings... and their settings.*"
- 9.22 I cite this policy limb for two reasons.
- 9.23 First, this limb is the only one to seek to manage scale of new development relative to context. That part is, however, not applicable to the questions I am asked to answer because the subject site is not near to established residential areas for low to medium density.
- 9.24 Second, this limb does refer to the setting of listed buildings, which is in this case the Lido, whose setting comprises the Kings Meadow.

CR11i: NAPIER COURT

- 9.25 This policy provides the main basis for the townscape criticism of the proposals as set out in the Conservation/ Urban Design Officer Memo so I cite it in full:

This area will be developed for residential. The design must avoid detrimental effects on the adjacent Thames Valley Major Landscape Feature, and building heights should reduce from west to east across the site. Land on the Napier Road frontage will be safeguarded for Mass Rapid Transit. Development of the Network Rail depot will be dependent on an alternative location at the railway triangle to the west of the centre becoming available. Development should take account of mitigation required as a result of a Flood Risk Assessment.

- 9.26 The first test criterion relevant to my instructions is to avoid 'detrimental effects' on the TVMLF.
- 9.27 This is a straightforward policy test seeking to avoid harm to the visual amenity and landscape character of the open space.
- 9.28 The second test criterion relevant to my instructions is for heights to 'reduce from west to east'. It is accepted, reasonably, that the point of taper is from the adjoining major development at Thames Quarter, which is equivalent 12 residential storeys and so deemed to be a tall building (this development lies in an area identified as suitable for tall buildings; the subject site lies outside that area).
- 9.29 I have the following observations about this second criterion:
- 9.29.1 The taper sought is across the whole of the allocation covered by CR11i and not just the Napier Road half (or slightly more than half).
- 9.29.2 The supporting text does not explain the reason for the line of taper, and I have not found any evidence base document which explains the purpose for the taper either.

- 9.30 The policy does not describe the reason why it seeks a taper from west to east, and I have not found any urban design document or visual impact analysis supporting that either. The officer interprets the limb of the policy as seeking to ensure the development edge is less dense, reflecting, the officer says, the edge of centre site, but the policy does not say that.
- 9.31 Neither does the policy wording indicate that a taper is necessary to avoid detrimental effects on the TVMLF.
- 9.32 The two salient criteria – protection of the TVMLF and taper – are two freestanding points linked by a conjunction, ‘and’. That drafting does not mean there is a causal connection between the two. If that had been the intention of policy, then it would have been worded differently.
- 9.33 The supporting text does not provide any indication that the two propositions are more than freestanding requirements.
- 9.34 The officer clearly sees the policy wording differently, but can cite no evidence to support that interpretation.
- 9.35 The policy does not expressly say, either, between what points the line of taper, west to east, should be struck.
- 9.36 It is reasonable to infer that the lower part of Thames Quarter is one point, to the west, and bearing in mind that this building represents the edge of the tall building zone defined and managed under CR10.
- 9.37 But there is no obvious point or height to the east marking the end point of the tapering line at the east end of the Network Rail site comprising the extent of the allocation.
- 9.38 I do not see any logic in looking to the south of the railway for another line of taper; although that land is identified for redevelopment it is visually distinct from the allocation land.
- 9.39 The officer email advice from October suggests, on my reading anyway, that the lower development north of the river at Caversham is one relevant point to take into account. That area is set well away from the allocation boundary, across the meadow and the river, and it has no bearing on the scale of development that might be deemed acceptable on the site.
- 9.40 It is important to note that the policy CR11i does not identify the setting of the listed Lido as a constraint on development form even though the key plan for the strategy in CR identifies the structure (see page 149 of the local plan).

THE READING TALL BUILDING STRATEGY (2008)

- 9.41 This study looked at the whole of the central area to identify suitable locations for tall buildings. The subject site was not identified in an area suitable for tall buildings; however, the study methodology considered sensitivity of land in the central area subject to change according to best practice criteria, including sensitive views, heritage and open spaces.
- 9.42 See the attached plan at **Appendix 4.0**. Sub-area 11 included the site in question as part of a wider area, including the whole of the allocation area.
- 9.43 The only sensitivity view in proximity to the Site is one looking from the Kings Meadow east north east, across the Kings Meadow car park, that is, away from the subject site.

- 9.44 The appraisal for character area 11, Napier Road, on page 18 of Appendix 1: Townscape and Visual Assessment
- 9.45 I reproduce that page as **Appendix 4.0** to my opinion.
- 9.46 I highlight the following points:
- 9.46.1 On urban grain and townscape, the analysis finds:
- The buildings are fairly tightly packed and wedged between the railway line, Napier Road and the River Thames. Although the built form is tall, the individual block sizes are not very large. The numerous medium sized blocks separated by parking and landscaped areas creates a medium scale townscape.*
- 9.46.2 On townscape condition (as distinct from landscape), the analysis finds:
- The position of the character area squashed between the railway embankment and Napier Road creates the sense of this being a forgotten area. The combination of building heights and style, none of which are distinctive townscape elements, creates a weak townscape character.*
- 9.47 On townscape sensitivity, the analysis finds:
- Medium: Existing 10 storey apartment blocks are prominent features and ensures that buildings of a similar height would not appear uncharacteristic. However, the consistent height of the existing roofline and the residential character of the area ensure that significantly taller buildings would appear uncharacteristic in townscape terms.*
- 9.48 I do not take the 11 storeys proposed to be significantly taller than the existing 10-storey apartment building, at the east end of the Kings Meadow (known as Luscinia View).
- 9.49 The study did not identify this area to be edge of centre in the terms of the October 2024 officer advice, and whilst the study ruled out the area as suitable for tall buildings (12 storeys or more), the analysis did not identify the setting of the Lido or the open landscape to be limiting factors.
- 9.50 There is no support in this study for the officer's interpretation of the need for a taper, therefore, and bearing in mind a 10-storey building at the east end of the line of taper was deemed acceptable.

10.0 NPPF DECEMBER 2024 (DESIGN)

10.1 The NPPF was revised subsequent to the October 2024 advice.

10.2 This contained a new policy on making best use of land, 125(c), which states that planning policies and decisions should:

give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

10.3 At the time of writing, there is no extensive appeal authority demonstrating the application of this policy.

10.4 I do not think the drafting can be intended to apply to impacts on designated heritage assets, which are subject to separate statutory provision and a range of restrictive policies. Thus, the word 'substantial' should not be read in the context of the classification of substantial versus less than substantial harm to the significance of designated heritage assets.

10.5 The PPG states:

Paragraph 125(c) of the National Planning Policy Framework states planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused. When determining such proposals, decision makers will need to take account of this policy alongside other policies within the Framework taken as a whole. As an example, where a proposal would cause less than substantial harm to the significance of a designated heritage asset, paragraph 215 (which requires the public benefits of the proposals to be weighed against the less than substantial harm) would still need to be applied. Where relevant, decision makers will need to provide a clear articulation of how paragraph 125(c) has been demonstrably considered and applied alongside other policies.

10.6 I conclude 125(c) could be relevant to the determination of the application.

11.0 CONCLUSION ON THE POLICY APPLICATION

- 11.1 I conclude that the main policy consideration in this case is the impact and effect of the proposals on the visual amenity of the Kings Meadow. This is the main matter discussed in the October 2024 email from the Council, and this is the matter forming the substance of the first bullet in the July 2025 email from the Council (which can be read or construed as comprising draft reasons for refusal).
- 11.2 The requirement to taper applies across the whole of the allocation and from the west, and the proposals comprise the western part.
- 11.3 There is no defined line of taper between two points.
- 11.4 The allocation lies in the Station River/Major Opportunity Area, CR11. There is nothing in that policy or the Central Reading development management policies requiring a taper or reduction in height at the edge of the area to respect the sensitivity of the TVMLF (Kings Meadow). The only scale reference in policy is CR10, which is the tall buildings zone sitting within the Central Reading area.
- 11.5 There is no policy or advice I have been able to find which requires there to be any marked scale change between development in the CR10 part of CR11. The tall buildings study, 2008, does not identify any requirement for a taper either, or identify the open space as a reason not to allocate this character area for height.
- 11.6 I have read the treatment of the CR policies in Local Plan Review, March 2023.
- 11.7 In its review, the Council propose an update to EN13 to address the proposed extension of the Chilterns National Landscape and to rectify a misunderstanding arising from an appeal decision about how the policy is to be applied; however, EN13 is not relevant to the facts of this case.
- 11.8 In respect of CR11 the Council considered that the policy should be updated to take into account the potential impacts of changing national policy on matters such as increasing densities in town centres.
- 11.9 I have not been able to locate the Inspector's report on the Local Plan Examination Reg 19, but I assume that any major modification s/he might have suggested and relating to a main CR allocation would have been reflected in some way in the final wording.
- 11.10 If the policy is understood to require a taper down from Thames Quarter across the site and not just across the allocation, then the proposals, which have a single height, would conflict with that limb of the policy. However, there is no reason to assume any line of taper across the site, and so I do not think there is conflict with that policy.
- 11.11 If, however, and for the sake of argument, there was found to be a conflict with that part of CR11i, then that does not mean the proposal should be refused.
- 11.12 Therefore, I conclude the correct approach is to look at the actual effects of the proposal.
- 11.13 With that in mind, I summarise comments from the officer as set out in his email of October 2024 and then address these in more detail in the following section of this advice note.
- 11.14 First, it is stated that there is a conflict between the mansion flat idea and the degree of ornament on the buildings (or alleged lack of detail), demonstrating poor design.

- 11.15 Second, the officer finds that the use of similar detailing 'lacks imagination'.
- 11.16 Third, he finds that the form of development is dominant when seen from the Kings Meadow.

INITIAL COMMENTS ON THE MERITS OF THE OFFICER'S ANALYSIS

- 11.17 I see no merit in the first criticism, which alleges a kind of category failure. The officer is in effect saying that in order for a mansion flat typology to be successful, it needs more ornament than one has on these buildings. I have to ask 'why.' But the point is moot anyway. I do not think one needs a prototype or precedent to justify new and denser forms of development than were delivered by late Victorian and Edwardian mansion flats (which were smaller buildings than what is proposed).

- 11.18 It is inevitable that new building styles will evolve to meet the imperative requirements for making best use of PDL in a high sustainable location. This point is made well in the National Design Guide, at paragraph 44 which, whilst advising a contextual design approach, states:

However, well-designed places do not need to copy their surroundings in every way. It is appropriate to introduce elements that reflect how we live today, to include innovation or change such as increased densities, and to incorporate new sustainable features or systems.

- 11.19 Paragraphs 59 and 60 are also apposite:

59 – Where the scale or density of new development is very different to the existing place, it may be more appropriate to create a new identity rather than to scale up the character of an existing place in its context. New character may also arise from a response to how today's lifestyles could evolve in the future, or to the proposed method of development and construction. Larger scale new developments, such as garden villages or urban extensions, may benefit from a variety of characters so that different areas or neighbourhoods each have their own identity.

60 – Where the character of an existing place has limited or few positive qualities, then a new and positive character will enhance its identity.

- 11.20 The proposals are either well designed in their own terms, including having an acceptable effect on the character and appearance of the area, or they are not. I do not think a Council can refuse a scheme for failing to compare exactly with a precedent that provided lower densities than now required and from which there is no obvious local precedent anyway.

- 11.21 Second, as to the proposed design and detailing lacking imagination: this is an assertion and vague, and no weight can be given to this criticism. It is highly subjective.

- 11.22 The real issue is whether the buildings are dominant.

- 11.23 To form a view on this, I apply my professional judgment to the visualisations and drawings and my experience from the two Site visits.

- 11.24 This is ultimately a criticism about the scale of the buildings relative to the Kings Meadow.

- 11.25 Scale has different meanings. It is, first, about absolute site (bulk and mass), but the perception of scale is actually a function of two further variables: the spatial envelope in which a building is experienced and the detailed design and appearance of a building.

- 11.26 The National Design Guide defines the first measure of scale, the primary or spatial one:

26 – Scale is the height, width and length of each building proposed within a development in relation to its surroundings. This relates both to the overall size and massing of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. It affects how a space can be used and how it is experienced. The relationships between the different dimensions of a building or component are known as its proportions.

27 – Enclosure is the relationship between the height of the buildings across a space, and the dimension of the space itself. Taller building heights and a more built up building line both increase the enclosure. Different degrees of enclosure influence how people use different spaces, by creating differences in character that suit different activities.

- 11.27 At its narrowest dimension, the building is some 105 metres to the line of mature trees to the north and overhanging the Thames Path. This is across the listed Lido, but that is a low building that does not enclose its space but sits within it, as a feature.
- 11.28 That distance ranges to more than 140 metres at the east end of the site.
- 11.29 The proposed development at 11 residential storeys has a height above the Napier Street pavement level of approximately c. 37 metres.
- 11.30 And the sense of spatial expanse beyond the trees is greater than the open greensward comprising the Kings Meadow because the land to the north comprises the river and open land.
- 11.31 The ratio between the buildings and the line of mature trees is thus at its narrowest 1 to 3, which is a generous spatial envelop.
- 11.32 The question is, really, whether the extent of 11-storey buildings taken together is intrusive or overbearing in its perceived effect.
- 11.33 The development comprises two blocks, A and B (to the west) and C and D (to the east).
- 11.34 There is a gap of c. 16 metres between each block (that is between the B and C elements of their respective blocks).
- 11.35 Soft landscape is proposed for this area, and this is described as a 'pocket park' in the DAS. The indicative landscape scheme shows garden sized ornamental trees, greensward and beds with some hard landscaping. This open space is set behind a screen which continues the architectural treatment of the ground floors of the buildings to either side.
- 11.36 Each element (A, B, C and D individually) has a recessed range in the centre, set back about 2.5 to 3 metres from the frontage. This set back rises to the full height of each block but sets back more significantly at the top.



Figure 11.1 CGI of the main elevation, showing the materiality and detailing, after recent amendments

- 11.37 The architectural language of this recessed range differs slightly from the main elevation: the design is more vertical, based on a brick pier. This same recessed range sets back again, for the top two floors, and here its elevation has a different cladding treatment again, more open and glazed, with thin mullions.
- 11.38 Between parts A and B and parts C and D is another set back range (similar set back depth), but which is much lower than the adjoining parts of the building, five residential floors against their 11 (always as measured from a ground floor that is slightly raised, I am advised, to deal with flooding). This lower range is proposed to be faced in light grey bricks, and its elevation is organised as vertical piers. The materials and architectural treatment contrast with the gridded language of the main facades.
- 11.39 This lower range contains the entrance to each of the paired blocks. The change in colour and height, taken together with the steps
- 11.40 The detailed treatment of the main elevations of the development has been subject to design development post submission (as has the height and massing). The latest changes sent to me are intended, amongst other things, to respond to comments from the DRP which encouraged more uniformity in treatment. As a consequence, the main parts of the proposals are proposed to be faced in a similar material and to be comprised, visually, of a regular grid which groups pairs of storeys. The windows have a deep reveal; that treatment is subject to a design detail which demonstrates it is deliverable. That depth of recess, taken together with the quality of the brick work and the cladding construction, are all critical to the success of the final design/construction.
- 11.41 Variety of texture in the brick is found in the side panels, and the metal works to the façade (comprising spandrel panels with integrated glazing and balconies on alternative floors) is intended to have a complementary palette to the brickwork.

- 11.42 The lower floor varies in its detailing. The textured brick here repeats the detailing of the side panels above.
- 11.43 The corner balconies are inset by about 1 metre and are about 4 metres long. The location of the corner balconies on the setback angles increases the sense of depth in the façade.
- 11.44 The architectural language is repeated on the wings to the north, facing the railway. This is not a particularly sensitive elevation, but it will be experienced by many rail travellers, and so it important for it to demonstrate a reasonable degree of design quality.
- 11.45 Overall, then, I conclude that the setbacks proposed, and the gap between the two blocks, are sufficient to create a sense of relief, shadow and modelling in the north facing elevation to the Kings Meadow. This is demonstrated in the CGI from a location in that open space.
- 11.46 The proposed brick detailing adds to the modelling of that elevation, as does the contrast in materials of the centre or entrance ranges, which are lower, adding to the depth of relief in the building line.
- 11.47 The brick facing proposed and depth of relief would be attractive; this is a fairly standard treatment, comprised largely of a regular gridded elevation, and the scale is modulated by drawing together storeys in pairs. This treatment is an accepted way of reducing the apparent scale of a building.
- 11.48 The primary scale of the building is established by the extent of the development, with its modelling, and the continuity of material which would, in my opinion, provide a simple and calm backdrop to the park of an appropriate scale taking the extent of the open space into account. I also consider that the particular brick tonality sits attractively in a verdant parkland setting and works well across the seasons.
- 11.49 The gathering together of alternative storeys into a double-height grid and corner inset balconies, taken together with the depth of reveal in the wall provide secondary scaling features or elements, legible and appreciable over middle distant views.
- 11.50 At a finer or tertiary scale, the brick itself, in the main facing and the textured areas, taken together with balconies, railings and hedging and landscape provide another scaling layer.
- 11.51 The design integrates all three scaling elements, primary, secondary and tertiary, and this gives the design a cohesive quality which is attractive.
- 11.52 The character of the buildings is not demonstrative or expressive. Rather, they have a definite and clear character, noticeable, but providing a coherent background to views out from the Kings Meadow. Those views, at the moment, take in development of a varied character. The proposals present the opportunity to manage the background of the open space, obscuring views of buildings that were not seemingly designed to have a positive interaction with the space. In that respect, as element better defining the open space, I see them as beneficial.
- 11.53 The landscape design to the west is effectively a continuation of the existing developments on this side, with a footpath set alongside the building and a planted green area between this and Napier Road. This arrangement allows for tree planting at the west end, enhancing the entrance to the Kings Meadow on this heavily used approach.
- 11.54 The site narrows in depth to the east and the area of landscape in front of the footpath narrows accordingly.
- 11.55 Where the landscape strip allows it, ornamental street trees are proposed.
- 11.56 The building frontage on block C and D come near to the back edge of the pavement, and here privacy is achieved by the hedge planting and railings. I think footfall at this end of the site is likely to be less

because I understand the main entrance to the park to be to the west. In any case, the landscape scheme allows for a planted strip that provides a buffer between the road and the front of the building, providing privacy.

- 11.57 I understand the scope for tree planting in this strip is limited; however, there is open landscape and trees on the other side of the road, to the north, and this provides a pleasant outlook. That outlook could, however, be capable of improvement through landscape and improved boundary treatment in Napier Road, within the Kings Meadow, on third party land.
- 11.58 I note the DAS contains a historical aerial photograph which I reproduce below.

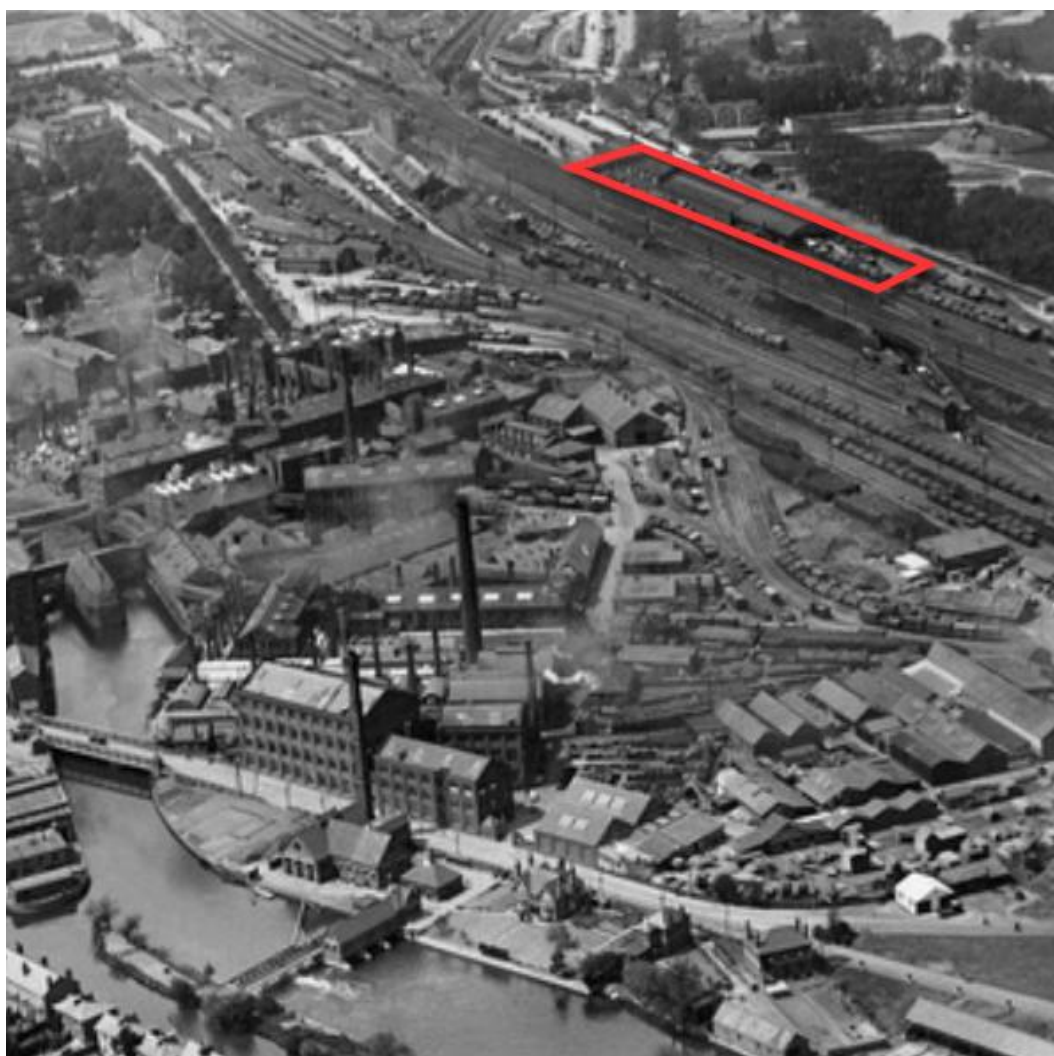


Figure 11.2 Historic Aerial Image of the Site (in red) looking north-west. Source. Design and Access Statement, p.21. This shows the boundary planting in the Kings Meadow and along Napier Road, and which was planted about the time of the listed lido's construction. The off-site mitigation planting could achieve a sense of enclosure like what is shown here, enhancing the amenity of park users and those walking along Napier Road.

- 11.59 An offsite payment is proposed to cover landscape works to the Kings Meadow. I think there is a significant opportunity to enhance the amenity value of that landscape feature through planting along within the Napier Road edge, providing an enhanced setting as well to the listed lido and car park.
- 11.60 The revised proposals for the landscape reflect the advice I gave, following on from my site views and our historic research. I understand that planning obligation monies would allow for this works to this

area, and that this money is provided in addition to a CIL payment in excess of £7 million. I would encourage the Applicant to press for this landscape improvement using the planning obligation which I understand is intended for off-site works arising from the impact of the development. The landscape would be a demonstrable benefit to the TVMLF. Such landscaping, when it matures, will also materially reduce the impact of the proposals on the character and appearance of this part of the Kings Meadow, should a decision maker consider that the impact of the development from this part of the Kings Meadow requires further mitigation.

12.0 THE VISUAL IMPACT

- 12.1 The visual impact of the proposals is greatest from the Kings Meadow, and with this large space, from within the area called Zone 1 in the DAS – I note that this is the only document I have seen to divide the open space sensibly into distinct zones or areas, three in all and clearly defined by linear landscape features/trees and orientation of the spaces. I agree that the space has this structure, comprised of a series of enclosed elements. I should add that some of the boundary planting between Zone 1 (which contains the listed lido) and Zone 2 has been eroded, and the landscape proposals for Kings Meadow would allow for strengthening that structural planting, another benefit to the open space.
- 12.2 I conclude that the scale of the buildings can be accommodated in the large spatial envelope comprising Zone 1 of the Kings Meadow.
- 12.3 The change will undoubtedly comprise a major impact, but the effect is beneficial as a consequence of the quality and characteristics of the design, as described in section 11.0.
- 12.4 The proposals also present a single, cohesive façade to the space. Presently, the view from Kings Meadow comprises different buildings and none, including the existing buildings, were designed to address the space or to provide it with spatial definition.



Figure 12.1 Image of the existing Site from within Kings Meadow



Figure 12.2 CGI Render of the Scheme from within Kings Meadow.

- 12.5 I am fortified in my findings because the Design Review Panel came to a similar view. They are a respected panel who looked at the scheme twice, and I think the local authority should give due weight to their comments on height and scale. Comments on matters of detail will always, inevitably, be more subjective or at least subject to reasonable disagreement. The DRP advised a more continuous treatment of materials agree this would create a more cohesive backdrop to the Kings Meadow. This advice has been taken into account and has informed the recent amendments to the scheme.
- 12.6 This is an unusual case, in my experience, of a large development which has, as a matter of fact, quite a limited spatial/visual envelope. The impacts on other views from the Kings Meadow, from the compartments of landscape comprising Zones 2 and 3 as defined in the DAS, is much reduced, and I do not think there should be any real concern from officers. I do not read the October email as expressing such a concern in any event, and neither does the Conservation Officer (who comments on visual impact, see below).

13.0 THE IMPACT ON THE LISTED LIDO AND OTHER HERITAGE ASSETS

- 13.1 I consider the impact on the ability to appreciate the significance of the lido is a freestanding point. The principal planning officer has not raised this, but I have seen two conservation officer responses alleging harm to that asset from setting change.
- 13.2 The Conservation Officer does not explain how the visual change erodes the ability to experience the historic interest of the Lido. That interest is intrinsic to it.
- 13.3 Neither does the officer explain what attribute of historic significance would be undermined.
- 13.4 The separating distance between the listed building and the proposals is significant. The proposals do not alter the silhouette of the listed building.
- 13.5 The external architecture of the lido is modest in character, and the decorative and architectural embellishment of the building on the south elevation, facing the site, is domestic in scale and really only appreciable from its close setting, and with one's back turned towards the site.
- 13.6 The setting already includes taller development and in a much more direct setting relationship with the listed building. This is not to say that the impact of these buildings on the setting of the lido justifies another impact. The modern taller development one sees at the moment is not harmful because the listed building is set in its own verdant setting, and the trees provide a buffer, and ensure the building is appreciated as part of the park, not what is outside the park.
- 13.7 Furthermore, and as noted, the area south of the lido was treed, so the intention was to create an intimate setting. See historic aerial photograph in the DAS, as reproduced previously.
- 13.8 And even more relevant, the Council planted trees near to the building as part of its recent restoration, forming a beech tunnel from the car park to the spa entrance, with trees to the south and east side which will, when mature, have the scale of parkland trees. That means that any visual interaction with the proposals will be even less than now. The original setting of the Lido was intended to be enclosed by landscape and trees, adding to the amenity of users (and providing privacy too, for the area generally was used for public bathing, either open air for men or enclosed, in the lido, for women).



Figure 13.1 Image of the listed Lido with new tree planting in front.

- 13.9 HCUK make the point, correctly, that the site in question was unrelated in function and character to the Kings Meadow, and, furthermore, that the Lido's significant interaction is with that open space. The Lido's recreational purpose is reinforced by the open land; and the facility was positioned here, I understand, to be accessible to users and near to a men's pool.
- 13.10 Furthermore, the real architectural interest of the building is its interior, an elaborate galleried architecture, whose spatial scale internally is intimate. This, where one sees the pool and sitting out areas, is where the significance of the building is most apparent.
- 13.11 The Conservation Officer response reasons that because there is, in his view, harm to the open space, then there must, as a consequence, be harm to the significance of the listed building.
- 13.12 Yes, the Lido has a meaningful setting relationship with the Kings Meadow, and the development can be seen from the Kings Meadow, but those two interactions are discrete and, in any event, I do not find any harm to the Kings Meadow's amenity of outlook.

Other Assets: the Scheduled Abbey, Associated Listed Buildings, the Listed Jail and Forbury Gardens Registered Park

- 13.13 The second consultation response from the Conservation Officer (discussed above) identifies a low level of less than substantial harm to an important collection of designated assets located to the south of Forbury Road.
- 13.14 The Scheduled Monument comprises significant upstanding remains of Reading Abbey, which appear in a good state of repair and are integrated within an amenity landscape that runs off of Forbury Gardens. These ruins are experienced in a relatively developed context, and one is aware of surrounding development within that space (including the listed jail).

- 13.15 Running north of that are a group of buildings including a listed church, and which are designed in a Gothic Revival style that complements the Abbey ruins. Forbury Gardens today has the character it received when laid out as a public park after the Borough Council purchased it in c. 1861; the land itself has considerable archaeological and historic interest, with evidence of activity from the C9 but whose main association, in my opinion, is its medieval use as part of the Abbey precinct.
- 13.16 These three assets, Abbey ruins/listed buildings/gardens, thus form a cohesive grouping.
- 13.17 They are separated from the site by the ring road, recent office development (which is visible to varying extents from within the grouping) and the railway. The car park to the north is identified as a development site.
- 13.18 The proposals would be visible from the eastern parts of the gardens, but as a background element, and the wider experience of these related assets is that they are part of a modern urban environment, with larger buildings near to them and forming part of one's experience of them more generally.
- 13.19 Accordingly, I do not think the proposals (faced in a brick which has a colour that is characteristic of Reading) would be incongruous or intrusive. In forming that view I am mindful of the presence of a modern office complex in the sightlines from the eastern part of the gardens and the road to the south. I also understand that the car park is an allocated site, and its development at any scale consistent with the development plan's aspirations for it will effectively remove the potential for any visual impact. I am clear, however, that the impact is not harmful on the basis of the current situation, given the presented design (height, scale, mass and detailed appearance).
- 13.20 The jail was designed by George Gilbert Scott in partnership with W B Moffat, and dates to the early 1840s. It is an example of the Panopticon principle of prison design devised by Jeremy Bentham. The main historic example of that type was Millbank Prison (now the site of the Tate Britain gallery and the c. 1900 housing estate to the north, in the City of Westminster).
- 13.21 The jail site comes up close to the ring road, and in approach views along that from the south the proposals would be visible albeit over a distance and across a proposed development site. What impresses about the jail from this position is the scale and monumentality of the jail outer secure perimeter, a huge and featureless structure experienced in a modern environment. That wall would, likely, make any potential visual impact very unlikely and in any event there is the separating distance and the interposing development site.
- 13.22 Accordingly, I agree with the conclusions of the HIA supporting the application, which is that any change is limited and not harmful to the ability to appreciate or understand the heritage value of this very interesting, larger asset grouping.
- 13.23 I disagree, therefore, that the proposals would have any materially harmful impact on this group.

14.0 PROSPECTS ON APPEAL

- 14.1 As explained earlier, the context for my instruction is an application heading towards committee with an officer recommendation to refuse. My client is considering their prospects on appeal and have sought my opinion in respect of this.
- 14.2 There are of course no reasons for refusal yet formulated, but the officer emails discussed above give me a good idea about two of the areas which would feature in any decision notice supporting a refusal.
- 14.3 At the moment, the principal planning officer is not identifying heritage as an issue, but he has two objections from his internal heritage consultee, and the proposals would represent a visible change in the setting of the listed lido and the much higher value asset grouping to the south of the railway.
- 14.4 I can only give an opinion on prospects which reflect my views, and whether as an expert I could present strong evidence concluding no harm to these designated assets.
- 14.5 For reasons I demonstrate in this report, in Section 4, 9 and 11, I consider the Appellant would have a strong case at an appeal that relied on character, appearance and heritage.
- 14.6 As things stand, it is clear that one reason for refusal would relate to height, scale, bulk, mass and detailed design, and one supported by the allocation policy. Such a reason could allege a lack of taper across the site, but as explained earlier if the effects are acceptable then I do not see that part of the site allocation policy as presenting a significant conflict with the policy (and that assumes an Inspector does accept the Council's assessment of the meaning of the policy).
- 14.7 In my opinion, the scale of the buildings is appropriate in the spatial context of the Kings Meadow. The DRP has confirmed it has no issue with the scale of the buildings, and their comments relate to detailed matters mostly, which the recent amendments address satisfactorily.
- 14.8 Those recent amendments, and in particular the reduction in height of the link blocks, taken together with the set backs/inset devices (corner balconies) successful break down the mass, and the three scales at which buildings can be perceived all come together in a satisfying and cohesive way. The red brick is appropriate to the local context (Reading is associated with this colour brick) and the consistency of design and materials across the blocks provide an attractive boundary, which is consistent and provides good enclosure spatially.
- 14.9 I do not think the proposals to enhance the landscape in the Kings Meadow are necessary to make the visual impact acceptable; however, such a landscape would mitigate or soften the impact if a decision maker was concerned about that interaction of scale with the Kings Meadow. Such proposed landscaping would also comprise an environmental benefit to the landscape character and amenity of the Kings Meadow, and therefore result, in my opinion, in a finding of overall positive impact, even in the event that an Inspector reached a different view regarding the visual impact of the scheme.
- 14.10 I do not think that the development would overbear in its context because the proposals have a high quality of design and some landscaping, provide overlooking and variety in appearance, and because the experience is not just of the development edge but also of the space on the other side of the road.
- 14.11 Finally, there is some concern, I understand, about cramped layout to some units at the back. I note, briefly here, that the proposed changes seek to change the dimensions of the windows facing the internal courtyard/corners to the south of the site. I think it is hard at the moment to respond to or to critique the Council's criticisms because they are not fully detailed as they would be in, I assume, a committee report and statement of case (should our client appeal).

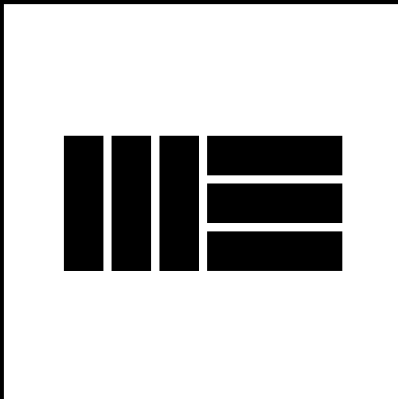
15.0 SIGNED AFFIRMATION

- 15.1 I confirm that, insofar as the facts stated in my Proof of Evidence are within my own knowledge, I have made clear which they are and that I believe them to be true, and that the opinions I have expressed represent my true and complete professional opinion.
- 15.2 I confirm that this report includes all facts which I regard as being relevant to the opinions that I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.
- 15.3 I confirm this report is prepared as independent expert advice, and the opinions I express are not influenced in any way by the applicant's position, and that my reporting is impartial.
- 15.4 I confirm that I am neither instructed, nor paid, under any conditional fee arrangement by the Applicant.
- 15.5 I confirm that I have no conflicts of interest of any kind other than any already disclosed in this report.



Dr Chris Miele MRTPI IHBC
Senior Partner
Montagu Evans LLP
24th September 2025

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL