

Memo

To: Jonathan Markwell
From: Buju Can Cetin, Conservation Officer
Date: 12/03/2026
Re: Conservation Officer response

Application Number: PL/25/1706

Application Type: Outline Planning Approval

Address: Forbury Retail Park Forbury Road Reading RG1 3JD

Proposal: Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, partial basement excavation, up to 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement.

Summary

Objection – The heritage impacts on the settings of heritage assets, deriving from the footprint and height of the proposed blocks, have not been analysed by the applicant fully due to the viewpoints not including heritage assets, failing to demonstrate the relationship of the new development with the historic environment.

As there would be some balconies, planting equipment, and façade organisation that opens discussion to the final appearance or the full composition of the design of buildings and the final height, I am unable to assess the impacts, but I think there would be additional negative impacts on the street scene and settings of heritage assets. There is no heritage benefit. The benefit from the quality of design appears not to balance the harm from the possible massing.

The proposal would, therefore, result in less than substantial harm and cannot not be supported on heritage grounds.

Relevant policies and legislation

From the point of view of the historic environment, the main statutory tests are set out within the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 16(2) and 66 require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character and appearance of designated Conservation Areas.

National Planning Policy and Guidance

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

Paragraph 203 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

Paragraph 212 of the NPPF requires that *'when considering the impact of a proposed development on the **significance** of a designated heritage asset, great weight should be given to the asset's conservation....'* And paragraph 213 says, *'any harm to, or loss of, the significance of a designated heritage asset (from its alteration...) should require **clear and convincing justification**'*. Paragraph 214 says that *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the **public benefits** of the proposal...'*

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

Local Planning Policy and Guidance

Policy EN1 'Protection and enhancement of the historic environment' of the Reading Borough Local Plan sets out the Council's aspirations for the historic environment. The policy requires that all proposals to protect and, where possible, enhance the significance of heritage assets and their settings, historic character and local distinctiveness of the area in which they are located. It echoes the NPPF by stating, *"Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits"*.

Applications which affect **Listed Buildings** are expected not to have an adverse impact on the elements that contribute to their special architectural or historic interest, including their settings.

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

Policy EN3 'Enhancement of conservation areas' of the Reading Borough Local Plan also requires that development proposals within Conservation Areas contribute positively to local character and distinctiveness.

Policy EN6 'New Development in a Historic Context' also requires new development to **contribute to, respect and enhance the architectural and visual qualities of the historic environment** characterised by heritage assets.

"When determining planning applications for new development, the following factors will be taken into consideration:

- a. **The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);***
- b. **Sensitivity to historic context;***
- c. **Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);***
- d. **Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.**"*

In addition, policies CR15 and CR13a directly relate to important heritage assets of Reading and set out principles for major development as follows.

CR15: THE READING ABBEY QUARTER

The Abbey Quarter will be a major area for heritage and cultural life within the Borough, offering educational, economic and open space opportunities. The Council will pursue any opportunities to reinstate features of architectural or historic significance and remove features that harm the asset and its setting.

Development in the vicinity should promote the architectural, archaeological or historic interest of the Abbey and its setting. *The Abbey Quarter will:*

- a. protect and enhance the historic setting and frame the Abbey as Reading's most significant heritage asset;*
- b. manage and maintain its heritage assets within a coordinated approach;*
- c. further reveal significance for public enjoyment through enhanced access, interpretation, archaeological investigations or repair of neglected elements;*
- d. mitigate impacts on transportation networks by strengthening pedestrian, cycling and public transport linkages for increased tourism; and*
- e. represent a cohesive heritage destination for tourism and investment.*

The Abbey Quarter should be considered in the context of the adjacent Reading Prison site identified in policy CR13, which represents an opportunity to further consolidate the cluster of heritage interest.

CR13a, READING PRISON: *The prison building itself is of historical significance and is listed, and its historic significance will be conserved and where possible enhanced. The building would be used for a use compatible with its heritage, which might include residential or student accommodation, commercial offices or a hotel, and should include some cultural or heritage element or related retail and leisure that draws on its significance. **The site is part of a scheduled ancient monument, and therefore any additional development will be dependent on a thorough demonstration that it would not have detrimental impacts on the significant archaeological interest. The prison adjoins the Abbey Quarter, and development should therefore enhance that area as a heritage destination.***

Other Guidance

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

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

Relevant heritage assets

The application site lies between the railway line and King's Meadow, home of Grade II listed Kings Meadow Swimming Pool to the north and Forbury Road (A329) and the Reading Abbey Quarter to the south. It is also bordered by the Grade II listed Plummary Wall to the south/southwest.

This assessment would focus on direct impacts that are potentially harmful to heritage assets rather than indirect impacts. It is considered that reducing the impacts on the adjacent historic environment would also eliminate impacts on the wider setting of Reading.

Therefore, below is the list of heritage assets which require detailed consideration:

King's Meadow Swimming Pool – Grade II Listed Edwardian Lido

The Plummery Wall – Grade II Listed wall dating mid 19th century

Reading Abbey Ruins – Grade I Listed, 1121 founded by Henry I

Abbey Gate – Grade I Listed

The Forbury Garden – Registered Park and Garden

Archway Connecting Forbury Gardens to Abbey Ruins. Including Retaining Walls Flanking Path to Abbey Ruins – Grade II*, mid 19th century

Wall between Forbury Road and Abbott's Walk to west of St James's Church – Grade II Listed, possibly circa 1840 or 1855

Reading Gaol (main building) former Her Majesty's Prison – Grade II Listed prison designed by George Gilbert Scott and William Boynton

Maiwand Memorial in Forbury Gardens – Grade II Listed

Anglian Cross in Forbury Gardens – Grade II Listed

Church of St James's – Grade II listed, 1837-40 by Augustus Welby Northmore Pugin

St James's Presbytery – Grade II listed, circa 1840 by Augustus Welby Northmore Pugin

St James Former School Buildings – Grade II listed dating 1876

Shelter at north-east corner of Forbury Gardens – Grade II Listed, possibly circa 1855

Assize Courts – Grade II Listed

Shire Hall – Grade II Listed

and Grade II Listed Houses at Nos 10, 11 and 12 on Abbot's Walk

Significance of heritage assets

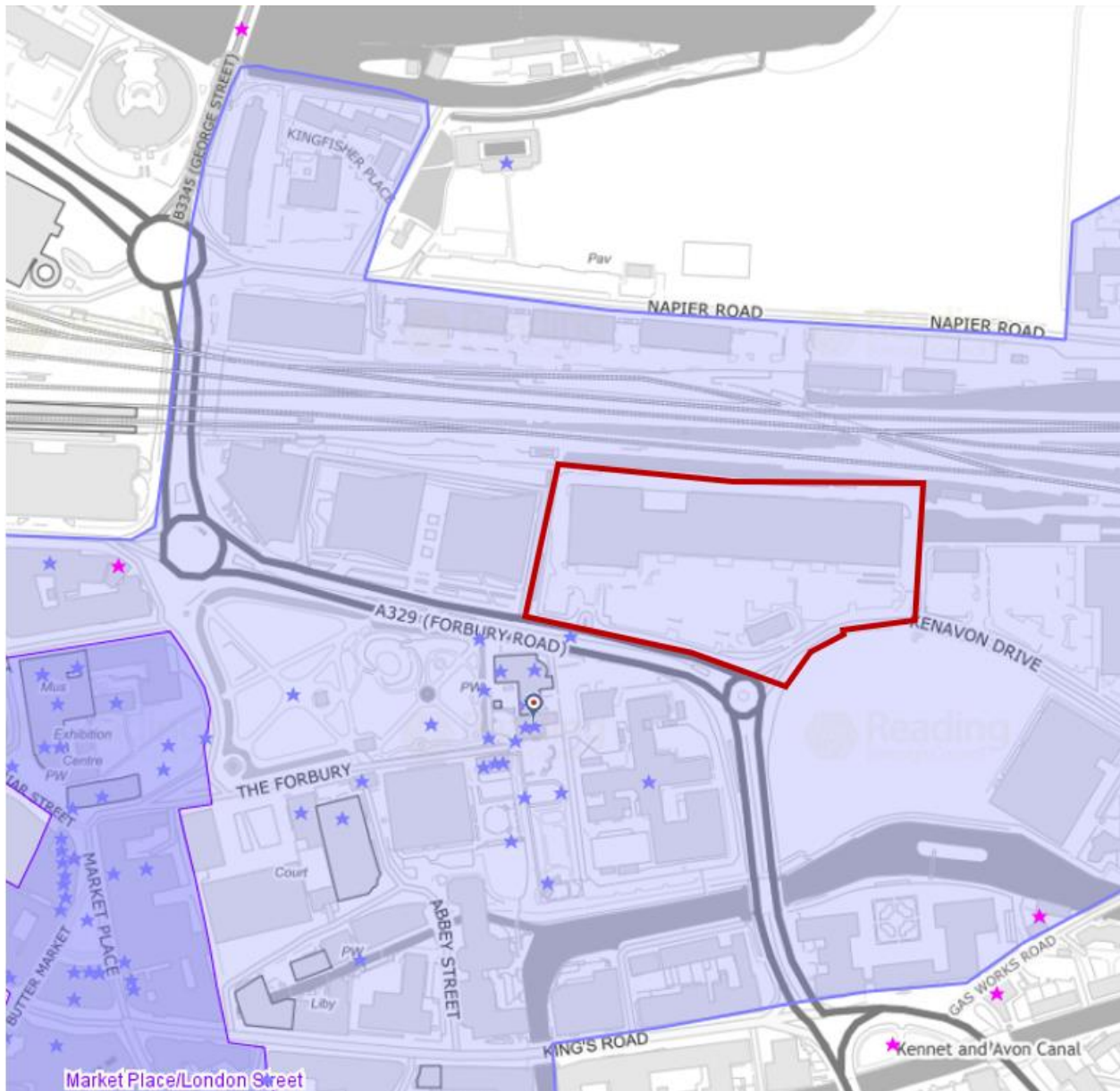
The NPPF defines significance as the *“value of a heritage asset to this and future generations because of its heritage interest.”*

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

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

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

In addition to each listed building's individual historical and architectural interest, the application site is historically and physically attached to Reading's most significant historic environment, dating back to the foundation of Reading Abbey, along with the Forbury Gardens and King's Meadow. It should be emphasised that this – hereafter referred to as the Abbey Quarter – constitutes physical evidence of Reading's Past from every period of the town. Not only the archaeological potential lying underground, but also the listed buildings and their composition create a unique place of multi-layered cultural landscape, revealing the authenticity of Reading.



The application site – Forbury Retail Park (outlined in red), listed buildings (purple starred), locally listed buildings (pink starred), the Market Place/London Street Conservation Area (purple shaded) and Area of Archaeological Potential (light purple shaded)

It should also be noted that Reading Abbey, including the Civil War earthworks and Reading Prison, is a Scheduled Ancient Monument. Along with the Forbury Gardens (designated as a Registered Park and Garden) and further registered Town Hall building complex to the west, this historic quarter also has the significance of mature trees/green open space. This feature continues to the south towards Kenneth and to the north in King's Meadow. Another important green/open space is the railway/railway line that is integrated into the historical development of the town, which provides views from an elevated position while approaching on a train.

As such, the development site and its immediate environs are bounded by the most sensitive – highest value – listed buildings in Reading. Any development in the application site should respond to the Abbey Quarter's and the Forbury Garden's physical form, morphological and historical development, its uses and the nature and quality of the public realm.

Special historic and architectural interest of listed buildings

King's Meadow Swimming Pool

"934/0/10054 KING'S MEADOW ROAD 25-AUG-04 Caversham Lock King's Meadow Swimming Pool

II Women's Outdoor Swimming Pool. 1902, with minor late C20 alterations. Designed and built by John Bowen, Borough Engineer & Surveyor, at a cost of £4,890. Ironwork made by Allen & Kidgell at their Caversham Bridge Engineering Works. Red and white Brick with ashlar dressings and plain tile roofs. Canopy roofs replaced with C20 corrugated iron. INTERIOR has white tiled rectangular swimming pool 120 ft long and 45 ft wide. Pool surrounded by a covered loggia with a timber roof or canopy. This canopy supported on ornate cast-iron columns, with elaborate brackets above. Octagonal entrance building now masked by C20 temporary boarding. The shallow end retains a large number of original timber changing rooms sited under the surrounding canopy. EXTERIOR has octagonal entrance building projecting from the centre of the long south side. Octagon has tall tile roof with four small dormers, each with tile-hung sides and timber brackets supporting the gables. Main entrance has central doorway topped with a bold ashlar pediment containing a shield bearing the date '1902'. Either side two windows to the octagon and seven windows on either side, the chamfered ends have a single window each. All these windows are linked by a moulded ashlar cill band, and they are now boarded up. The left end has a single tall chimney stack. All the external walls are orange brick with a white brick band above. The three remaining sides are all blind. This pleasure bathing pool was built to allow Edwardian women to bath in privacy. It was originally fed from the Thames, though it was converted to the mains supply in the 1950s. It is an extremely rare and very fine example of a complete Edwardian Lido."

The Plummery Wall

"FORBURY ROAD 1. 5128 (North Side) The Plummery Wall SU 7173 NE 1/488 SU 7273 7/488 II 2. Mid C19 wall on site of and probably incorporating the mediaeval Plummery wall Dwarf wall of mixed flint and random rubble and brick with low mid-C19 railings. North side about 8 feet high.

Listing NGR: SU7200573664"

Reading Abbey Ruins

"SU 7173 NE 1/1

SU 7273 7/1

READING Forbury Gardens Reading Abbey Ruins

(Formerly listed under Abbots Walk)

22.3.57.

GV I

Founded 1121 by Henry I and intended to be England's principal Cluniac House. Extensive precincts stretched from the Plummery Wall (qv) to the Kennet and from St Laurence's (at the west gate) (qv) to the east side of the Gaol (qv). Caen stone, quarry flint and Taynton stone. From excavation and from what remains it is clear that the Abbey with its apse and apsidal transept chapels was in the mainstream of Norman architecture. It may have been vaulted but insufficient research has been done on this aspect, which would have made it remarkable indeed. The picturesque surviving fragments are a rubble core stripped almost entirely of its facing stone. The remains are principally grouped to the south of St James's R C School. They include portions of the north and south transepts, the chapter-house (which must have resembled that at Durham), the west wall of the Dorter and the rere-dorter.

Fragmentary remains in the Forbury Gardens are listed separately. A further stretch of wall runs towards Abbey Street behind Abbey Wall. For the Gatehouse, Hospitium see separate items. Reading Abbey's importance now lies in the field of Romanesque sculpture. Fragments were disposed as far away as Shiplake, many are still incorporated in walls through-out Reading and several cart-loads of carved stones abound in the Forbury Gardens. The date of the carved fragments is probably not later than 1136 (when Henry I was buried in the chancel) and is more likely to be circa 1130. The best items which have come to light, many excavated in the 1950s and probably from a cloister, are now in Reading Museum (some, including the Coronation of

the Virgin, were previously at the V and A where they were on display). The excavated cloister capitals include the earliest known representation of the Coronation of the Virgin and one with two bearded angels. Fragments of decoration include masks, chevron and more especially beakhead, probably its earliest use in England. A large stone with interlace now used as font in St James' RC Church (qv). (Ancient Monuments, Berks No 1).
Listing NGR: SU7199073554"

Abbey Gate

"THE FORBURY 1. 5128 Abbey Gate SU 7173 NE 1/112 22.5. 57. GV I 2.

C12 to C14. Entirely remodelled by Sir George Gilbert Scott 1861. Flint and Bath stone ashlar, quoins etc to ground floor. 2 storeys with shaped modillion cornice, parapet with weathered coping, Central pointed archway with roll mould and gabled drip over. Flanking buttresses. 4 lancets on 1st floor with foiled heads, 2 on ground floor with impost and cill strings. Octagonal end turrets with cornice, parapet and cope. Turrets and buttresses chamfered below squinches of 1st floor; headstops in squinches. Inside the archway is a large round headed arch with a double flat roll. Entrance passage intended to be vaulted, 2 pointed doorways and stairs to left. Rear much the same except for round headed entrance.

Listing NGR: SU7188273556"

The Forbury Garden

"Mid C19 public garden developed on the site of the former Reading Abbey precinct.

LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING The Forbury Garden lies at the north-east corner of Reading town centre, between the C12 St Lawrence's church to the west and St James' church (Pugin 1840) to the east, overlooked by Reading Gaol to the east of this. The 2ha site is largely enclosed by a low brick and flint wall, in places still punctuated by tall piers to give a castellated effect. It is bounded to the north by the dual carriageway Ring Road, to the east by the path from Abbot's Walk to St James' church and beyond this the ruined remains of the Abbey, and to the south by Abbot's Walk at the east end, becoming at the west end The Forbury which also curves north alongside the west boundary. The landform is largely level, with the prominent raised earthwork of Forbury Hill adjacent to the north boundary. The setting is urban, with St Lawrence's churchyard to the west, and views of the west end of St James' church to the east, together with views of the rebuilt Abbey gateway adjacent to the south. The remaining Abbey ruins stand to the south-east of the Garden. The ground around them, also laid out in the mid to late C19, runs down to the River Kennet to the south.

ENTRANCES AND APPROACHES The main entrance approaches from the Market Place to the west, off The Forbury at the south-west corner of the Garden, past the War Memorial (Leslie Gunston 1932, constructed by Collier and Catley) and between iron double gates set back off the road, behind the War Memorial. Five further perimeter gateways give access from the surrounding roads, including the iron Victoria Gates (1897) at the centre of the south boundary, from which the main south-west to north-east path extends into the eastern half, giving access from Abbot's Walk. At the south-east corner of the Garden lies the Forbury Tunnel (mid C19, listed grade II*), a flint and stone archway incorporating many fragments from the former Abbey, which gives access from the Garden to the Abbey ruins, whilst carrying a path above giving access from Abbot's Walk to St James' church to the north.

GARDENS AND PLEASURE GROUNDS The Forbury Garden (scheduled ancient monument) can be divided into two halves, relating to both the medieval Abbey's Inner and Outer Courts, and subsequently the mid C19 development of two separate areas overlaid on these earlier sections. The eastern half, opened in 1856 as the Pleasure Gardens, is dominated by Forbury Hill standing in the north-west corner, overlooking the rest of the former Pleasure Gardens. The area is bisected by the main path running north-east from the Victoria Gates at the south-west corner, flanked by lawns with bedding beds, encircling a central fountain within a small, circular stone pond, and terminating at the domed alcove (c 1855, listed grade II) in the north-east corner. Built of flint and brick, the alcove includes numerous fragments of the C12 Abbey, with a

domed apse flanked by two projecting walls. A further cross path runs north-west from the Forbury Tunnel, encircling the fountain and pond, to ascend and encircle Forbury Hill to the north-west. This earthwork is planted with mature trees around its sides, and is surmounted by an open, level plateau, largely laid to gravel, formerly the site of C19 seats and a Russian Gun (OS 1879, now gone). From here it is possible to overlook most of the site. The ends of the paths crossing the eastern half of the Gardens are connected by a serpentine path which encircles the whole of this area. A rose garden, present in the 1870s (OS), and divided into small beds, remains at the bottom of the east side of the Hill, and to the south of the pond stands the granite Anglian Cross (1909, listed grade II), erected in memory of Henry I. Formerly some twelve small stone vases (now gone) stood close to the edges of the paths in this area (OS 1879).

The western half of the Forbury Garden was bought by the Borough in 1860 and opened in 1861, being separated from the eastern half by a wall until 1873. Largely laid to lawn with seasonal bedding beds, it is crossed by the remains of three straight paths set obliquely to each other linking the various entrances in this section, the paths being linked by a perimeter path largely bordered on the outer side by mature trees and shrubs. The south-east corner of this half is laid largely to tarmac, at the centre of which stands the octagonal timber and iron bandstand (1896), with a conical tiled roof supported by narrow, white-painted iron pillars. At the centre of the western half stands the Maiwand Memorial (George Simmonds 1886, listed grade II), a tall stone plinth supporting an enormous cast-iron statue of a lion (three times life size and in an anatomically impossible stance), erected to commemorate the Battle of Maiwand in 1880."

Archway Connecting Forbury Gardens to Abbey Ruins. Including Retaining Walls Flanking Path to Abbey Ruins

"FORBURY GARDENS 1. 5128 Archway connecting Forbury Gardens to Abbey Ruins . Including retaining walls flanking path to Abbey ruins SU 7173 NE 1/482 II* 2. Mid C19 archway incorporating numerous fragments from the C12 Abbey. Flint base and high parapet walls (see Wall between Forbury Road and Abbot's Walk, Forbury Road). Soffit built of reused ashlar from abbey. Voussoirs are sculptured fragments (roll-mould, chevron, catshead etc). Each corner has impostes formed of double nook shaft capitals. The retaining walls on either side of alley leading to Abbey Ruins contain many more fragments included the north-west crossing pier capital.

Listing NGR: SU7197073585"

Wall between Forbury Road and Abbott's Walk to west of St James's Church

"SU 7173 NE 1/486

FORBURY ROAD (south side) Wall between Forbury Road and Abbott's Walk to west of St James's Church

II

Bounds Forbury Gardens to east. Probably circa 1840 or 1855. Flint with Bath stone ashlar piers of varying height. Panels opposite the west front of St James's Church have C12 fragments of carving and architectural decoration. Ends in small gate to Abbot's Walk with arch of re-used voussoirs and chevron capitals (C12), stepped parapet over. Fragments of Norman Abbey to be found also in wall to west of St James's School playground.

Listing NGR: SU7196573617"

Reading Gaol (main building) former Her Majesty's Prison

"Summary

County gaol, 1842-4 by George Gilbert Scott and William Boynton Moffatt, altered c.1970. Certain buildings and parts of the buildings are excluded from the Listing, as is made clear in the List entry.

Reasons for Designation

The main building at Reading Gaol, of 1842-4 by George Gilbert Scott and William Boynton Moffatt, is listed at Grade II for the following principal reasons:

* Architectural interest: an impressive, fortress-like design that represents an early work by one of England's foremost C19 architects;

* Planning interest: a pioneering English example of a radial-plan prison built for the newly-introduced 'separate system' of constant surveillance and solitary confinement;

* Historic interest: strongly associated with the imprisonment of Oscar Wilde, who spent eighteen months of his two-year sentence there and later immortalised the institution in 'The Ballad of Reading Gaol'."

Maiwand Memorial

"This list entry was subject to a Minor Amendment on 27/01/2012

SU 7173 NE 1/485 5128

FORBURY GARDENS Maiwand Memorial

II

1886. Sculptor George Simmonds. (son of George Simmonds of Simmonds Brewery). Casters Young and Co, Pimlico; terracotta pedestal Wheeler Bros. Kilns, solely supervised by the sculptor. 3 times life size cast iron statue of an enraged lion rampant weighing 16 tons. Rectangular pilastered plinth records the names of the dead. Tablet to south-west inscribed "This monument records the names and commemorates the valour and devotion of xi officers and cccxviii non-commissioned officers and men of the lxvi Berkshire Regiment who gave their lives for their country at Girisk, Maiwand and Kandahar during the Afghan campaign 1879-80 'History does not afford any grander or finer instance of gallantry and devotion to Queen and Country than that displayed by the lxvi Regiment at the battle of Maiwand on the 27 July 1880' - Dispatch of General Primrose". Erected by public subscription.

Listing NGR: SU7183673614

This List entry has been amended to add sources for War Memorials Online and the War Memorials Register. These sources were not used in the compilation of this List entry but are added here as a guide for further reading, 20 July 2017."

Anglian Cross

"FORBURY GARDENS 1. 5128 Anglian Cross SU 7173 NE 1/484 II 2. Erected 1909 "To the memory of Henry Beauclerk, King of England, who founded Reading Abbey on June 18, 1121, and was buried before its high altar on January 4, 1136". Tapering granite shaft on 3 steps. Tall. Capped with ringed cross. On north side badge of Plantagenets (3 leopards) and on south, badge of the abbey (3 scallops). The erection of this monument was instigated by the local antiquary Dr James on Hurry.

Listing NGR: SU7192873594"

Church of St James's

"SU 7173 NE 1/2 SU 7273 7/2

READING FORBURY ROAD (south side) Church of St James's 22.3.57.

GV II

Roman Catholic 1837-40 by Augustus Welby Northmore Pugin. Untypical Norman style. Much altered 1925 by W.C. Mangan (south aisle and apse ambulatory), and 1962 by Bingham Towner (north aisle). Flint with Bath stone ashlar dressings. Roman tile roof. Coped gables with footstones. Belfry to west. Round headed clerestory with continuous impost string. Five bays. Dividing and corner buttresses. West front has oculus at top, large round headed window with flanking blind arcade. Projecting porch with centre break and angled corners, round headed doorway with two orders, of chevron. Three apses to east, centre with ambulatory. Three bay

south aisle with six bay double arcade inside. North-east pier has fragment of beaded C12 carving.

INTERIOR: wooden roof, vaulted apse. C12 interlacing on re-used stone from Abbey is now the font. Pugin's first church design. The Norman style probably dictated by proximity of Abbey remains.

Listing NGR: SU7199273629"

St James's Presbytery

"SU 7173 NE 1/2A

FORBURY ROAD (south side) St James's Presbytery

GV II

Circa 1840. By Augustus Welby Northmore Pugin. A rare example of Norman revival - quite alien to his normal style. Very much altered and included for the sake of the fragments of the Norman Abbey built into it. Two storeys, flint with slate roof, Bath stone ashlar quoins and dressings. 2+2 windows, left hand part altered to modern casements with drip-moulds, wide central door. Right hand part slightly taller with mullion and transom windows (only one on ground floor). Left hand part has fragment of C12 billet moulded roll, the right hand part has another small fragment. A large fragment of the Norman Abbey in garden to east.

Listing NGR: SU7199473606"

St James Former School Buildings

"This list entry was subject to a Minor Amendment on 04/11/2019

SU 7173 NE 1/487

SU 7273 7/487

READING FORBURY ROAD (south side) St James Former School Buildings (Formerly listed as St James's Roman Catholic School)

GV II

1876. Plain Gothic. Flint with Bath stone ashlar quoins and dressings. Tiled and modern roman tile roof. Two gables to west, the right hand one projecting and taller with belfry. Shouldered lintels to casement windows. Two to left hand gable and five to right hand gable. Round-headed lights to gables upper parts.

Included for group value.

Listing NGR: SU7199773593"

Shelter at north-east corner of Forbury Gardens

"SU 7173 NE 1/483

READING Forbury Gardens Shelter at north-east corner of Forbury Gardens

II

Possibly circa 1855; park shelter re-using numerous fragments from the C12 Abbey. Domed apse with two projecting walls containing lunette windows. Some flint and brick but mostly salvaged Caen stone and limestone ashlar, carved voussoirs and other fragments.

Listing NGR: SU7196173650"

Assize Courts

"THE FORBURY 1. 5128 Assize Courts SU 7173 NE 1/306 II GV 2. 1861. Said to be by J B Clacy. Baroque revival style in channelled Bath stone ashlar. 2 storeys with 2 1/2 storey corner pavilions which break forward. Cornices on ground and 1st floors, panels with palmettes over caps. 5 bay centre with flanking 1x1 bay wings. Ground floor Doric with engaged rusticated columns, paired to pavilions. Ionic 1st floor. C19 glazed sash windows, round headed on 1st floor, segmental headed on ground floor, with architrave surrounds and keys. Ground floor of centre projects between flanking pavilions and has 3 bay arcaded portico with balustrade over. Attics have elaborate recessed scroll terminals above entablature forming aedicules. Extensive buildings to rear. Interior: large central top lit and galleried hall. Street wall with 2 pairs of high cruciform piers with rusticated rebates to corners and ball-finials. Heavy lozenge pattern panels of rails.

Listing NGR: SU7186873529"

Shire Hall

"THE FORBURY 1. 5128 Shire Hall SU 7173 NE 1/305 26.7.73. II GV 2. 1904-11, by Warwick and Hall. Queen Anne style. Red brick with, Portland channelled ground floor and occasional quoins. Painted modillion cornice. Slate roof with balustraded top and panelled corner chimneys. 3 storeys, attic and basement. 5 bays, casements with glazing bars, eared architraves on 2nd floor, on 1st floor centre 3 segmental headed windows with open segmental pediment and keys, outer ones have bolection surrounds and keys. Modified Doric projecting portico in antis to ground floor extending across side windows, a pair of columns in centre and 2 more each side. Steps to entrance with round headed doorway with flanking niches. Altar-type cast iron lamp standards on flanking walls of steps. Wide dormer with cornice broken round it. Interior: groin vaulted hall.

Listing NGR: SU7184273540"

10, Abbot's Walk

"ABBOT'S WALK 1. 5128 No 10 SU 7173 NE 1/4 II GV 2. Early C19. (Probably circa 1840). 3 storeys and basement. Silver grey brick. Bath stone strings between floors, and stone window arches. Wide flat eaves. Slate roof. Brick end chimneys with coggled capping. 3 windows to upper floors, plate glass sashes with marginal glazing. Central door on ground floor. 1st floor windows have balconies with cast iron rails and honeysuckle pattern panels. Cast iron fleur-de-lys rails to front.

Listing NGR: SU7196673566"

11 and 12, Abbot's Walk

"ABBOT'S WALK 1. 5128 Nos 11 and 12 SU 7173 NE 1/3 II GV 2. Early C19. 3 storeys and basement. Bath stone. Strings at 1st floor impost level of arched windows and at 2nd floor cill level. Wide flat eaves. Slate roof. Glazing bar sash windows. 2 ranges of windows each, arched recesses for 1st floor windows. 6 panel doors with fanlights also recessed. Mid C19 cast-iron balcony across both houses with bowed section. Cast-iron fleur-de-lys railings in front.

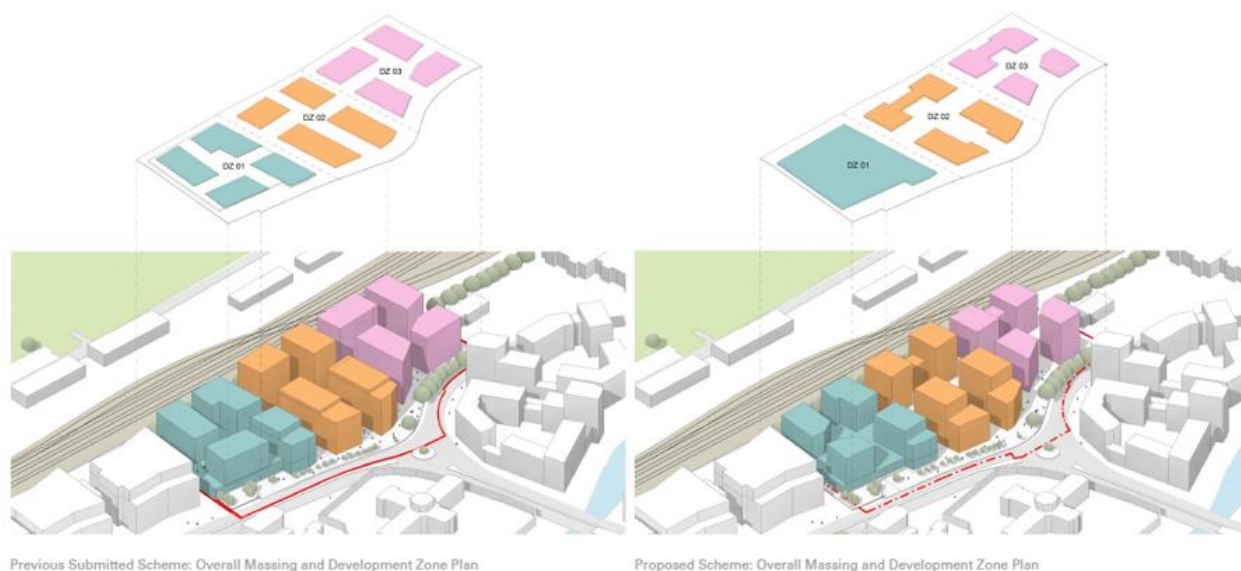
Listing NGR: SU7197273567"

Impact of proposal upon heritage asset(s)

This outline application is the resubmission of 230822 (PL/23/0822) for the regeneration of the existing retail park into a dense residential environment with a new urban form. I noted that there have been revisions to the proposed scheme, with all matters reserved apart from highway access. Whilst I reviewed the submitted Planning Statement, Design and Access Statement and Environmental Statement, including all appendices and Non-Technical Summary, I understand that it is the layout of the proposed development with maximum footprint and height limits described and presented by parameter plans and design codes where development zones, plot boundaries, land uses, site levels, amenity spaces, public spaces, vehicular access and circulation, maximum building heights and minimum separation distances between buildings are detailed.

Compared with the previously proposed scheme, the current proposal, in terms of the relationship between the footprint and form of the buildings and their relationship to each other, creates open spaces with some quality of vegetation and considers both pedestrians and cyclists, all of which are welcomed and supported from a conservation perspective. The submitted documents and illustrations, however, still show considerable density that, from the spatial and morphological points of views it is not possible to fully assess the heritage impacts of building lines, density and height without contextual and visual design considerations of height, scale, massing, siting, materials, colours, and appearance (final) of the proposed blocks.

The descriptive master plan for urban form and building layout, with some design principles, illustrates three development zones, two of which would have a direct impact on the listed buildings located to the south of Forbury Road, while all zones have further visual impact on the heritage assets. As seen from the image from page 83 of the Design and Access Statement, below, there is no significant difference between the setback positions of the southern blocks, and the proposed green environment along Forbury Road remains almost the same, although I appreciate partially lowering the heights of these blocks.



From the Design and Access Statement, for the rationale for height and massing, I noted that *“To minimise impacts on adjacent properties and maximize daylight penetration into the key open spaces, the height of the masterplan was focused to the centre and north portions of the site and gradually reduced towards the periphery to the far east and west.*

Additionally, step backs have been incorporated into the top floors of buildings along the south of the site to minimize the viewing impact when the scheme is observed along Forbury Road and Kenavon Drive.” (page 92).

There is no reference or mention of Forbury Gardens, the listed Church of St James, or Reading Prison, which I understand has not influenced the design of the blocks, contrary to the new development of Huntley Wharf, as most revisions have been made to the eastern cluster of blocks.

Whilst the illustrative appearance on page 119 of the statement could be considered with high quality of green elements incorporated into the proposed scheme, the massing, though it is illustrative, appears to have a harmful impact on the setting of the listed prison and church and views of Forbury Road. I suggest that the four blocks, as coloured yellow below, should have a more setback position, the first one on the west end should be lowered as well, while the two at the centre are the largest and tallest ones, affecting the setting of the prison the most. The sensitive heritage assets are colored in red, which includes Grade I Remains of Abbey. Therefore, the perimeter plans for Maximum Deviation Plan Ground Level and Upper Levels, Maximum Building Height and footprints should be revised to reduce the negative impact of the development.



From page 119 of the Design and Access Statement

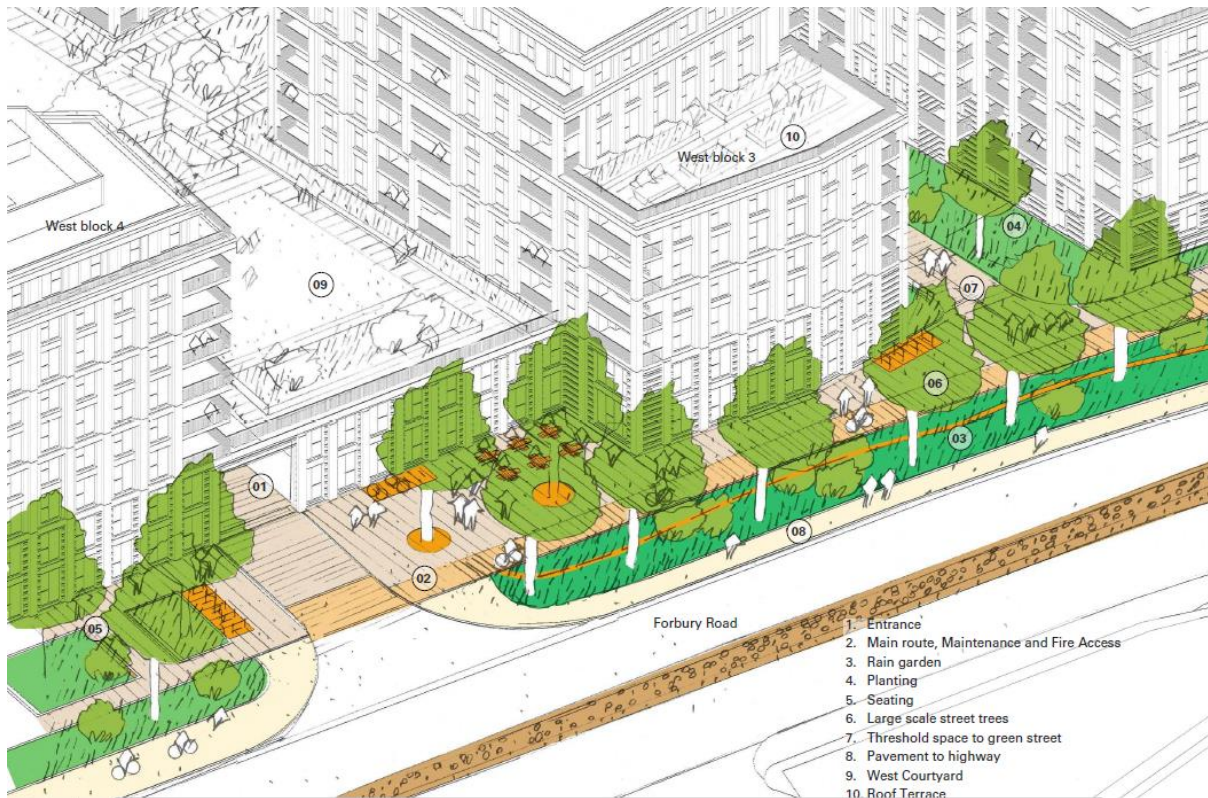
I find the proposed tree-lined 'Plummary Gardens' to be generated with minimum space and additional natural elements. This is easily noticed when the proposed view (illustrative) and the existing street view are compared below. It is the existing tree line and soft landscaping that is used by the proposed scheme, without any notable addition to the appearance. It is the proposed blocks that would define the site and the Forbury Road more than 'Plummary Gardens' and 'Plummary Garden Threshold'. All defined secondary space and territorial space would contribute to the quality of design itself, benefiting the residents. As such, I cannot define any heritage benefits from the proposed scheme. There are some good principles and quality of design, but there is no enhancement to the setting of heritage assets. I cannot assess the 'biodiversity roof with PV panel' without knowing how many panels are to be installed on the top of the building blocks or what amount of lift overrun or plant is to be proposed, which would have an impact on the setting of the listed buildings as well.

I have no objection to the proposed access, as long as there is no risk for pedestrians.

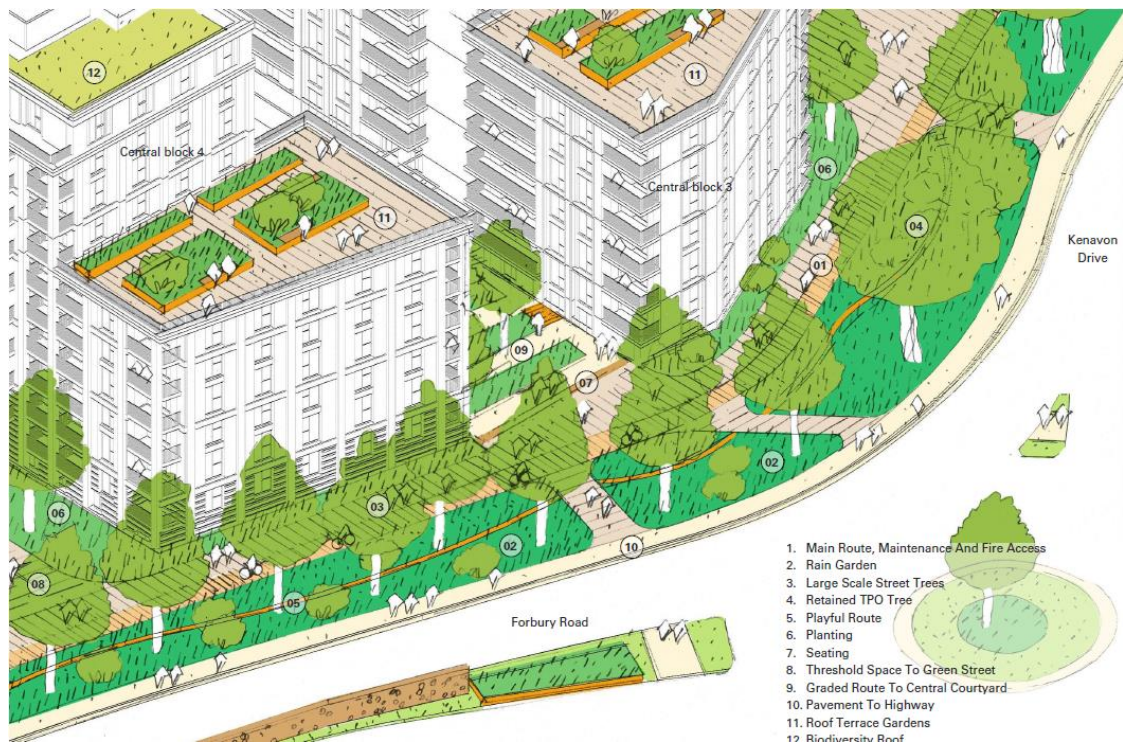
- Primary Space
 - 1. Plummery Gardens
 - 2. Plummery Garden Threshold
 - 3. Eastern Square
- Secondary Space
 - 4. Green Streets
 - 5. Western Courtyard
 - 6. Central Garden
- Tertiary Space
 - 7. Residents Terraces
 - 8. Infrastructure Landscape
 - 9. Biodiversity Roof with PV



I also think that the separation distances between the buildings may require increasing, as the illustrations below show there are long lines of buildings with a considerable massing that, from some angles, it is not possible to see the open spaces without removing the block from the illustration.



*This is the western block facing the listed church and closest to Abbey Ruins and Forbury Park.
This section would have more groundwork compared with the others*



Central Blocks facing Reading Prison / Gaol



Eastern blocks and 'Eastern Square' not visible(?) with the tree screening and a considerable amount of massing – blocks



Proposed 'Central Yard' again overbearing? impact of blocks on the open space is among the design considerations

The Built Heritage section of the Environmental Statement advises “A Zone of Theoretical Visibility (ZTV) has been produced to outline the potential areas where the Proposed Development may be visible, up to a 2km distance from the Site (see Appendix J.2 of the Built Heritage Chapter). The ZTV was run on a Digital Surface Model (DSM) using National LIDAR Programme data, 1m resolution grid, 2019. 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 ZTV indicates that the Proposed Development is most prominently visible within a defined wider area surrounding the Site but does not extend considerably beyond it. This reinforces the identification of a 500m study radius for heritage receptors with the potential to be affected by the proposals.”

About the heritage assets potentially impacted by the proposed development, the statement describes Group 1 : Reading Abbey Receptors with Very High heritage value. It states “10.5.58 At the nearest point, the Site is located approximately 30m to the south of Reading Abbey (as defined as a scheduled monument), however much of this comprises below ground remnants. In terms of above ground-built form, the Site is located approximately 85m to the south. ...” The site is located to the northeast of Abbey.

Reading Gaol is also valued as ‘High’. It is said “10.5.78 The historic prison, is set well back from the wall and does not have a prominent expression; hence, whilst it is concluded the Site is in its setting, is it considered that the Site does not contribute anything material to the ability to appreciate its heritage value.” by the Environmental Statement which I disagree as the building is visible from Kenovan Drive and also from the railway.



Google Street View, May 2025 the Gaol is visible. The application site is on the right. Please note, this point is not included within any assessments in the submitted statements

Group 2 assets are described as Church of St James and St James’s Presbytery and St James Former School Buildings and considered with ‘High’ value by the ES. It is advised “10.5.87 The Site forms a detracting feature within the receptors setting, to the immediate northeast. Its poor architectural quality and utilitarian character bear no relationship to the historic character of the cluster of church buildings.

10.5.88 Furthermore, the Site is not located within an element of the receptors' setting that contributes to an understanding of their significance. This is by virtue of the Site's origins as railing sidings and, since the early 20th century, its subsequent development with buildings of neither historic nor architectural value – initially industrial sheds and more recently, the warehouses of the retail park. There is no historic nor functional relationship between the Site and the cluster of ecclesiastical buildings.”

In this group, the Plummery Wall and 10,11, and 12 Abbots Walk are described with high value, which I agree. However, it is interesting to note that for all heritage assets, there is expected no likely effect.

Ref	Heritage Receptor	Sensitivity	Magnitude	Likely Effect (Operational)	Likely Effect (Cumulative)
1	Reading Abbey Ruins	Medium to High	Nil	None	None
2	Abbey Gate	Medium to High	Nil	None	None
3	Church of St Laurence	Medium to High	Nil	None	None
4	Archway connecting Forbury Gardens to Abbey Ruins, including retaining walls flanking path to Abbey Ruins	Medium to High	Nil	None	None
9	Reading Gaol	Medium	Nil	None	None
10	Church of St James's	Medium	Nil	None	None
11	St James's Presbytery and St James Former	Medium	Nil	None	None

Snip from the Heritage section of the ES, Table 10.13 Summary of Heritage Assessment, page 183

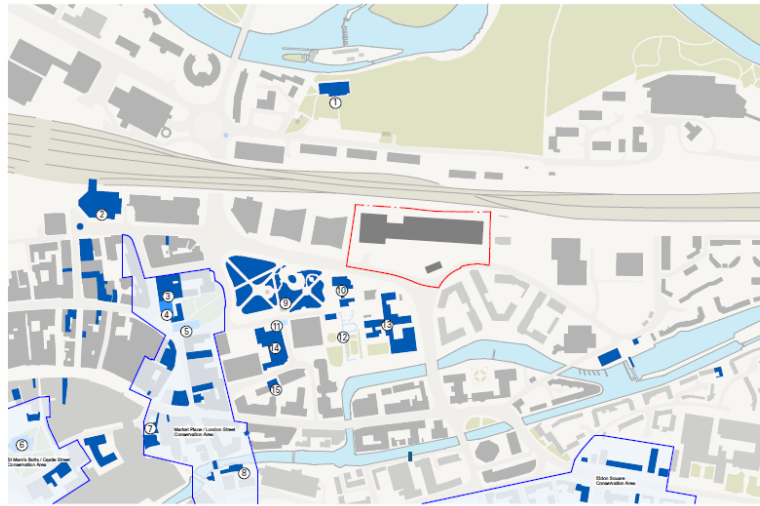
I would like to draw attention to the colours chosen for the heritage assets/ buildings on the map (this is in the statements) below. Whilst Grade I Reading Abbey Ruins have a higher status of protection by the Act, due to the very light blue colour used for its presentation, it is almost invisible on this map. I think a revision is required for that as well, as it may cause misjudgments.

2.2.11 Listed Buildings & Conservation Areas

The plan and photographs opposite identify conservation areas and listed buildings, divided in their various grades.

Forbury Road is a major thoroughfare in the centre of Reading, running east-west from the A3290 to the town centre. The road is named after the nearby Forbury Gardens and was historically an important route into the town. There are several notable buildings along Forbury Road, including the Forbury Hotel, a Grade II-listed building with a striking Victorian Gothic façade, and the Reading Crown Court, a modernist building that replaced the former county gaol in 1998.

■ Conservation Area
■ Grade II*
■ Grade II
■ Grade I



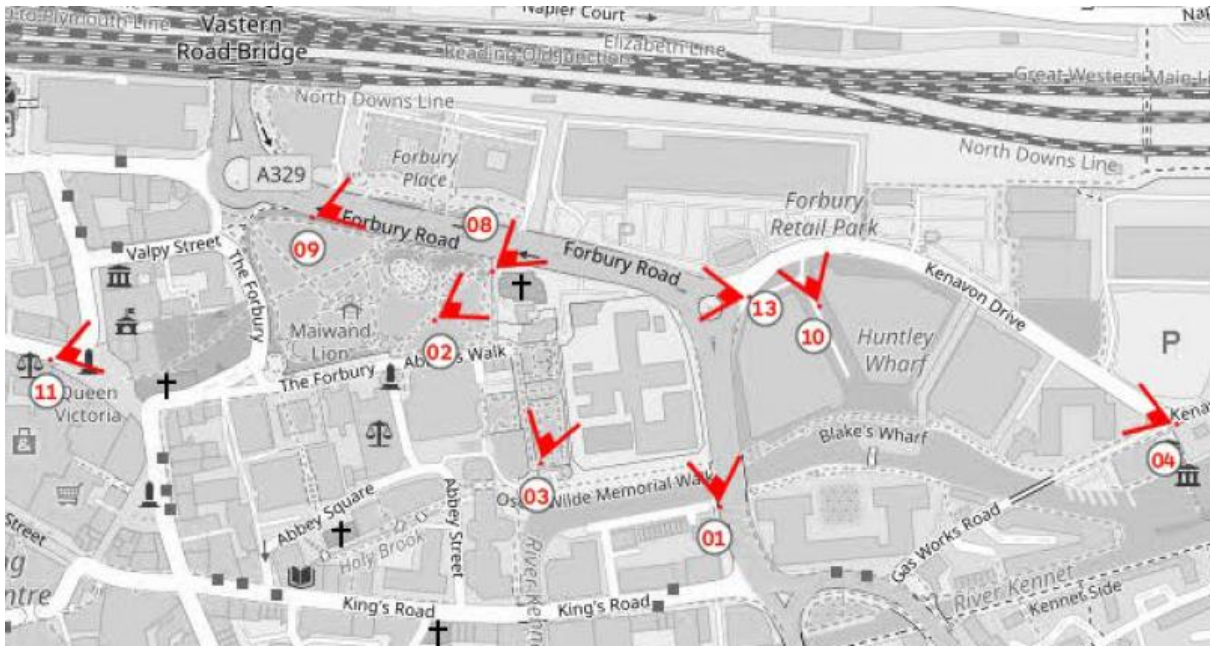
Map of listed buildings & conservation areas

Although the submitted heritage assessment finds there is no impact on the settings of heritage assets, I conclude that there is less than a substantial impact on the settings of the Reading Gaol, St James's Church Complex, and Forbury Gardens (the Abbey Quarter as a whole), and there is no heritage benefit. My following comments explain further.

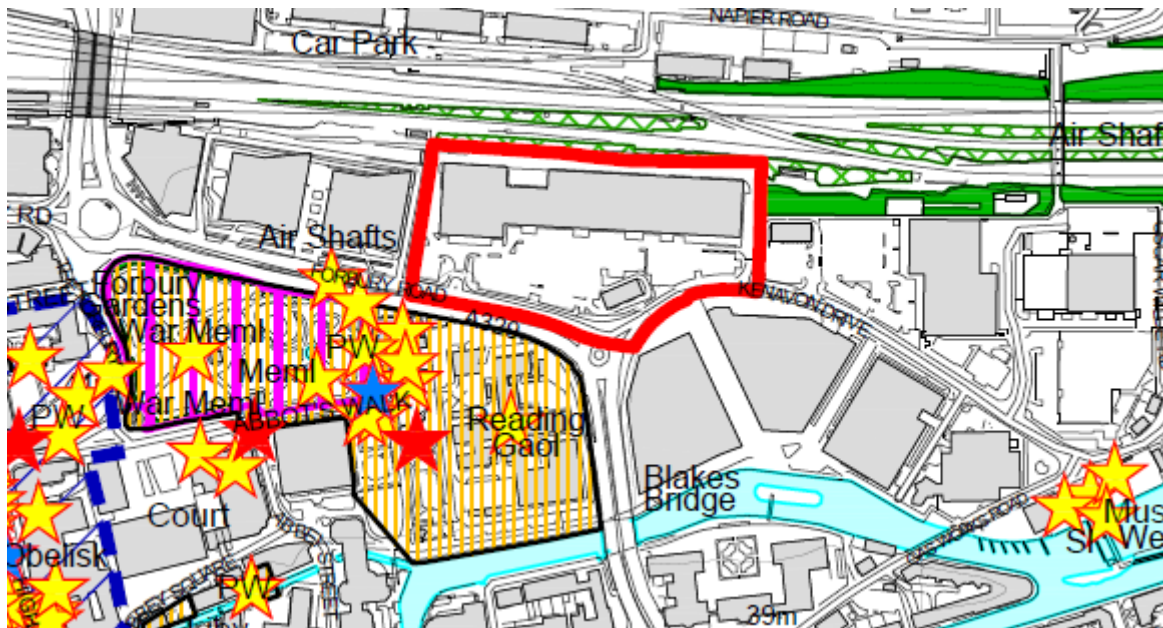
From Study Area of Theoretical Visibility (ZTV) Plan below shows that there is high visibility from Forbury Road and Kenovan Drive. It is important to look at the visual relationships between the proposed development and the aforementioned heritage assets, as the roads are two sides/ faces, and they include all, as illustrated.



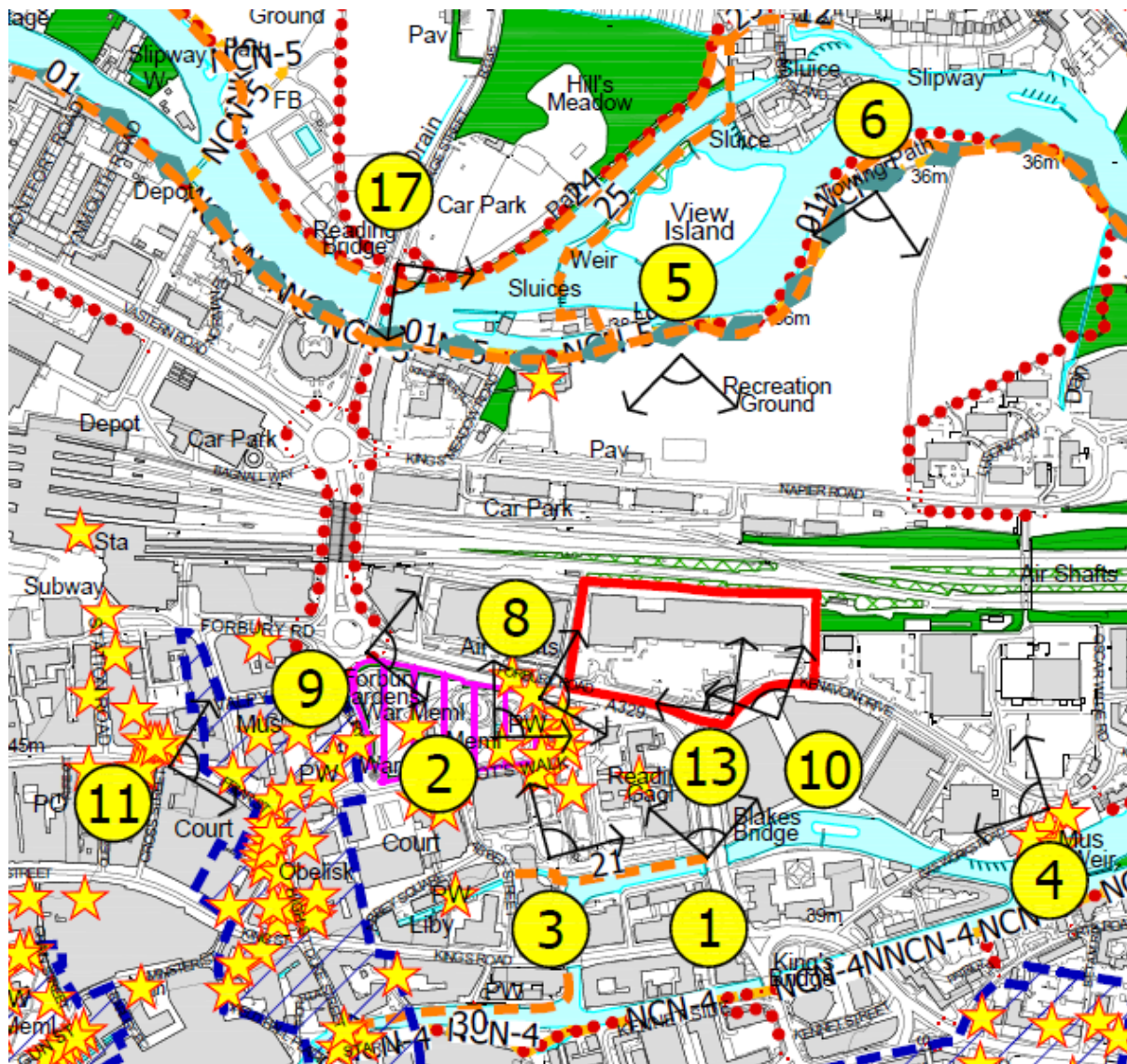
When compared with the viewpoints below, it is hard to understand why point No. 10 is considered important, as it is not highly visible. Similarly, Points No. 11, 9, 3 and 1 are all from the white/very light areas, while 8 looks towards the development without showing any relationship.



The snip from Heritage Assets Plan, compared with the viewpoints, again seems problematic. With such a high-value area and close visual relationship, there should have been more views studied that would show the actual impacts on the setting of heritage assets, so that no impact conclusion could be strongly justified or tested.



There is another problem, which shows some viewpoints that do not suit or overlap with the ones above. The viewpoints in the map below, from the ES again, have the same points but with different angles. I am not sure about the consistency of the maps and views.



From 'Verified View Document', I inserted the following and noted that

- Viewpoint 1 shows the impact of the massing and height on the setting of Reading Gaol, although it is positioned quite set back, not including the main building. I am not convinced.
- Viewpoint 2 shows the impact of the proposed development on the setting of St James Church and Forbury Gardens – so I cannot conclude 'no impact'.
- Viewpoint 5 shows the impact from King's Meadow, none of the high value buildings are included or referenced in this view. It is only for the impact of the natural environment which is also dramatic.
- Viewpoint 8 – I do not understand the rationale behind this viewpoint. It appears to have chosen not to include the listed church or prison on purpose. Not convinced.

Therefore, I do not agree with Appendix M5. Townscape Effects Table 2 and Appendix M6 Visual Effects Table, as anyone can introduce viewpoints without a heritage asset in it. I would like to paste my site visit photographs from my comments for the previous application for the settings of heritage assets and viewpoints to be reconsidered.



View of the Reading Gaol, St James's Church and Forbury Gardens from the existing entrance of the site (photo from the conservation officer's site visit)



Open view from the front of the existing retail building oppose to the Abbey Quarter (Reading Gaol and St James' Church) (photo from the conservation officer's site visit)



View from the ring road to the front of the Forbury Garden on the right, the application site is dotted in red (photo from the conservation officer's site visit)

The submitted design codes document emphasises that the illustrative scheme is only one example of how the development could evolve. However, in relation to the design and appearance of the proposed blocks, I noted that there would be streets, routes and crossings, public realm & nature, and balconies at the upper floors,

I have no concerns about the proposed circulation as mentioned before.

Directly related to my comments about the setback positions of the blocks, heights and footprints, I would prefer a wider (not 10m to 20m including pavement) primary greenway for Plummery Gardens. Although all of the Public Realm & Nature codes appear acceptable and in line with the basic design principles, given that there is no active inclusion of the settings of listed buildings, I am unable to comment further. The only reference that I noted is 'respond to local vernacular and character'.

About the general Built Form Principles, it is hard to imagine or visualise the final appearance of the proposed scheme, and I am unable to fully assess the impacts of appearance. From the submitted design codes, I noted the following

"Building Plots are not flexible and cannot shift from the maximum deviation boundary as outlined within the Parameter Plans."

"Building footprints must be placed within the Parameter Plans accordingly to allow for a balcony zone inside or oversailing beyond the maximum extent footprint as identified by rules on the Parameter Plans."

"A minimum of 16m separation between faces of habitable rooms and facing non-residential uses must be observed."

"Maximum balcony & masonry bay protrusion permitted is 2m, in accordance with the maximum development zone illustrated on the submitted parameter plans."

“Where any separation distances cannot be achieved – justification and design measures must be incorporated to ensure privacy for residents is maintained.”

The principles/codes above are only valid for the enclosed spaces and proposed gathering areas between the building blocks. From the conservation point of view, I cannot make any comments except for the unknown impact of the balconies on the streetscape and settings of the listed buildings.

“Clear delineation of buildings must be made up of 3 key distinctions; ground floor (base), Middle and top – each with their own architectural distinction as well as being stitched together a clear and coherent design language.”

“Tops of buildings must be articulated clearly through alternative materiality or architectural geometry.”

Services, such as rainwater downpipes and MEP plant equipment, must be concealed or integrated into the design.”

I do not understand where the distinction of ground, middle and top floors comes from, but there is a possibility that, if there were the use of many materials with various colours, together with the distinction principle, there is a risk of cluttering and loss of identity of Reading. As illustrated below, one of the highest blocks would face the listed prison, and it could have a red brick finish, the same as the prison. Further, there is the use of buff brick opposite the listed church with a similar colour. I think there are too many features, elements, and colours proposed that compete with the local vernacular. I am unable to visualise how all the plant equipment, etc., would be concealed or integrated into the design. I think this would cause more identity problems.



Illustrative Material Study - Variety of Masonry types across the scheme.

To sum up, I am not convinced that the heritage impacts, especially on settings, deriving from the footprint and height of the proposed blocks have been analysed fully due to the viewpoints not including heritage assets, failing to demonstrate the relationship of the new development with the historic environment. As such, there would be less than substantial harm. As there would be some balconies, planting equipment, and façade organisation that opens discussion to the final appearance or the full composition of the design of buildings and the final height, I am unable to assess the impacts, but I think there would be additional negative impacts on the street scene and settings of heritage assets. Therefore, I cannot support the proposed scheme. Revisions are required to the setback positions, limitations to the height for the southern four blocks in the settings of the listed buildings. The benefit from the quality of design appears not to balance the harm from the possible massing.

Conservation response

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

Contact details

Buju Can Cetin, Conservation Officer