



TO

Jonathan Markwell (RBC Case Officer)
Reading Borough Council Planning Department
Civic Offices,
Bridge Street
Reading, RG1 2LU

FROM

Montagu Evans LLP (Heritage)

DATE

20th May 2026

SUBJECT

Heritage Consultation Responses
Forbury Retail Park, Forbury Road, Reading, RG1 3JD
Planning Application Reference: PL/25/1706

Montagu Evans is instructed by Aberdeen Standard Investments (hereafter the 'Applicant') to provide heritage consultancy for proposals at Forbury Retail Park, Forbury Road, Reading, RG1 3JD ('the Site'). A planning application (ref: 230822) was originally submitted to Reading Borough Council (RBC) on 8th June 2023 ("the 2023 Application") for the mixed-use redevelopment of the Site. Following further post-submission consultation with stakeholders, a number of key design changes were undertaken. These may be summarised as follows:

- Reduction in maximum building heights adjacent to the railway and facing Kings Meadow;
- Improved variation in heights of the blocks;
- Reduction of block footprints, reorientation of the spaces within the development and increased sense of enclosure;
- Reduction in the size of the basement car park and therefore removal of the podium to the east allowing seamless integration of the site with surrounding areas;
- Reduction in commercial floorspace.

A revised planning application ("the 2025 Application") capturing these design changes was subsequently submitted to RBC in November 2025 (ref: PL/25/1706), which was accompanied by an Environmental Statement ('ES'). Montagu Evans prepared Chapter 10: Built Heritage of the ES (the 'Built Heritage Chapter').

The purpose of this note is to respond to stakeholder consultation responses received from RBC's Conservation Officer; the Berkshire Gardens Trust ("BGT"); and, the Reading Conservation Area Advisory Committee ("RCAAC"). Historic England has been consulted on the 2025 Application and have advised that they do not wish to comment on the application.

The Built Heritage Chapter considered the potential for the proposed development to impact the significance of heritage assets. The study area included all designated heritage assets within a 500m radius and non-designated heritage assets¹ within 250m of the Site boundary, plus additional assets requested for inclusion by RBC in their Scoping Opinion dated 18th April 2023. The assessment found no harm to the significance of heritage assets as a result of the proposed development. This judgement is based on an understanding of the contribution made by setting to the significance of those heritage assets.

¹ As defined by the National Planning Policy Framework (2024)

Matters of Clarification

General Points of Clarification

RBC set out the policies and legislation relevant to heritage. The following are listed as being relevant to the redevelopment of the Site: Sections 16(2), 66(1) and Section 72(1) of the Planning (Listed Building and Conservation Areas) Act. The Site does not comprise any statutorily listed buildings, nor is it located within a conservation area, and as such, we do not consider Sections 16(2) and Section 72(1) of the Act to be relevant to the Proposed Development.

RBC considers that the colour used to illustrate the Grade I listed heritage assets on the map sourced from the Design and Access Statement by Squires and Partners Architects is misleading and requires amendment; however, it should be made clear that the map is accurate and, in our judgement, legible. The Heritage Asset Plan submitted at Appendix J.1 of the Built Heritage Chapter may be used if the reader requires a different format.

Viewpoints

RBC's Conservation Officer has queried the process for selection of verified views. The location of verified views was agreed with the Council twice at the time of the 2023 Application. Consultation in February 2022 included a preliminary selection of views, which resulted in three additional view locations being requested: within/adjacent to the listed St James Roman Catholic Church on Forbury Road and Reading Prison; from or within the Huntley Wharf development; and, to the western edge of Forbury Road. The view from the car park of the St James Roman Catholic Church was excluded, as it is located in a private car park rather than in the public realm. Additional townscape views were also added as a result of the Urban Design Review by Doyle Design in December 2023.

The views have been used to inform both the assessment for both the Built Heritage Chapter, and the Townscape and Visual Impact Assessment prepared by Stantec. Two view location maps were provided at Figure 13.9 of the TVIA ES Chapter and at the state of the Verified Views Document (Appendix M.4 of the ES). The numbering of view locations is consistent for both assessments, and so some views may be obsolete for the Built Heritage Chapter (such as View 10).

It is further queried by RBC why Views 1, 3, 8, 9 and 11 have been selected, owing to the limited extent of intervisibility demonstrated by the Zone of Theoretical Visibility ("ZTV") (overlaid with the Heritage Asset Plan at Appendix J.2 of the EIA). ZTV analysis is indicative and influenced by the accuracy of the digital model provided by the design team, including factors such as polygon topology, resolution, and surface orientation. It should therefore be treated as a high-level scoping tool to inform professional judgement, rather than as a definitive representation of actual visibility, as per Paragraph 1.4.3 of the Built Heritage Chapter.

RBC have commented that the viewpoint selection is limited for the purposes of assessing the impact of the proposals on the setting of surrounding listed buildings. The views are representative and not receptors in themselves e.g. they should be used to inform the extent of visibility and magnitude of change, but the assessment should be based on the significance of the heritage asset, the contribution made by setting and any impact upon that arising from the proposed development.

The following specific comments in relation to each view have been provided in the table below, with clarification from Montagu Evans:

RBC Conservation Officer Comment	ME Clarification
Viewpoint 1 shows the impact of the massing and height on the setting of Reading Gaol, although it is positioned quite	Paragraph 10.7.89 of the Built Heritage ES Chapter confirms VL1 Forbury Road (south) is located 250m to the south of the Proposed Development. It captures the axial

set back, not including the main building. I am not convinced.	view looking north along Forbury Road directly towards the Site. It provides one of the best representative locations travelling north along Forbury Road, with Reading Gaol located to the west (left). Paragraph 10.7.21 to 10.7.26 of the Built Heritage Chapter provides an assessment of the impact of the proposed development upon the setting and significance of the Reading Gaol, informed by the ZTV and Viewpoint 1, plus Viewpoint 13 and the application material as a whole.
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’	This goes to the heart of the approach undertaken by the Council. The officer states view 2 ‘shows the impact of the proposed development’ implying simply that there is visibility and therefore it equates to harm. The decision maker must consider the significance of the asset, including any contribution made by setting and the impact of the proposed development upon that. This principle is discussed further below, under ‘Heritage Impact Assessment.’
Viewpoint 3: Stated that this was from an area of limited intervisibility as per the ZTV.	Viewpoint 3 Reading Abbey Ruins is located to the south of Reading Abbey Ruins which allows for views looking across the designated heritage asset towards the Site and Proposed Development. Paragraphs 10.7.12 to 10.7.20 of the Built Heritage Chapter provides an assessment of the impact of the proposed development upon the setting and significance of the Reading Abbey Ruins, informed by Viewpoint 3 and the application material as a whole, in addition to professional judgement. The assessment acknowledges that the representative and the extent of visibility is likely to change as the observer moves around the abbey grounds, including areas closer to Forbury Road where it will replace the existing surface level car park and retail units on the Site.
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.	Paragraphs 10.7.54 to 10.7.59 of the Built Heritage ES Chapter provides an assessment of the Grade II listed King Meadow Swimming Pool, the principal high value building within King's Meadow. Viewpoint 5 is expressly referenced in the assessment text, having informed the assessment alongside the ZTV and the application material as a whole.

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.	Viewpoint 8 has been selected to illustrate the impact of the proposed development on the immediate setting of the Grade II listed St James Roman Catholic Church. Whilst the viewpoint does not include the church, it is located immediately outside it and therefore demonstrates the change looking from Forbury Road, in proximity to the church. It is a representative view, which has informed the wider assessment of impact of the proposed development upon the significance of the church and prison. Viewpoints 2 and 13 illustrate the impact of the proposals on the Grade II listed St James Roman Catholic Church and Grade II listed Reading Gaol. Paragraph 10.7.27 to 10.7.34 of the Built Heritage Chapter provides an assessment of the impact of the proposed development upon the setting and significance of St James's Church, informed by the ZTV, Viewpoint 2 and 8, plus the application material as a whole. Paragraph 10.7.21 to 10.7.26 of the Built Heritage Chapter provides an assessment of the impact of the proposed development upon the setting and significance of the Reading Gaol, informed by the ZTV and Viewpoint 1, plus Viewpoint 13 and the application material.
Viewpoint 9: Stated that this was from an area of limited intervisibility as per the ZTV.	Viewpoint 9 illustrates the impact of the Proposed Development from the western part of the Grade II listed Forbury Gardens. The view is representative and demonstrates the extent of visibility from this area. Paragraphs 10.7.43-10.7.53 of the Built Heritage Chapter provide an assessment of the impact of the proposed development upon the setting and significance of Forbury Gardens, informed by Viewpoints 2, 8 and 9, and the application material as a whole.
Viewpoint 11: Queried why this was included within the views selection.	As set out at Paragraph 10.7.70 of the Built Heritage ES chapter, Viewpoint 11 illustrates the lack of intervisibility of the Proposed Development from the immediate setting of the Church of St Laurence (Grade I) and associated Grade II listed churchyard structures.
Viewpoint 14: Stated that this was from an area of limited intervisibility as per the ZTV.	View 14 is included as a 'proving shot' to illustrate the lack of intervisibility from Oxford Road, looking east. It includes a number of listed buildings within the view.

The RCAAC has requested a further additional view from the northeast corner of Forbury Gardens. Viewpoint 2 is located within the eastern part of Forbury Gardens, where the ZTV indicates high visibility. When read alongside View 8, positioned just outside the north-east corner, the extent of visual change in this area is clearly understood.

Heritage Impact Assessment

A full Heritage Impact Assessment is provided in the Built Heritage ES Chapter. RBC disagrees with Montagu Evans' assessment of no harm on the surrounding heritage assets, identifying less than substantial harm on the Grade II listed Reading Gaol and Grade II listed Church of St James.

Page 4 of the RBC response lists a series of heritage assets; however, these are not further referenced in the response and harm is only identified to the assets we outline above. A full assessment of significance and potential impact of the proposals is provided for each of these assets in the ES Heritage Chapter.

Both RBC and BGT disagree with the magnitude of impact and extent of harm identified to the Grade II RPG of Forbury Gardens, the listed structures within it and 'Abbey Quarter' heritage assets (the Grade II listed Reading Gaol, Church of St James' and St James's Presbytery).

Planning policy requires an applicant to 'describe the significance of any heritage assets affected by a proposed development, including any contribution made by their setting.' Setting is defined in the NPPF as: 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

The drafting of the NPPF makes clear that some aspects of setting may be neutral. A *change* to setting, even a major one, may also be neutral, beneficial or harmful depending on the particular facts of any case. Case law has made clear that 'an impact is not to be equated with harm: there can be an impact which is neutral (or indeed positive).'²

The guidance provided by Historic England in its Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets ("GPA3") provides information on assessing the significance of heritage assets and on how one assesses the effects of development in the setting of an asset on its significance or cultural value. GPA3 is clear that visual perception matters a great deal. It is, after all, an objective measure. Historical and functional associations may be important on the facts of any case. It is clear from policy and guidance, however, and confirmed by the Courts, that impact on setting itself is not the consideration. Setting is important only to the extent it enables an appreciation of significance or contributes directly to it.

The guidance also recognises that changes to the setting of a heritage asset can enhance one's appreciation of significance, through better presentation, for example, or the creation of new views. Providing better public appreciation of a designated heritage asset, or some aspect of its significance is recognised to be desirable and an enhancement which can attract great weight in the planning balance. Equally, a setting improvement can arise if the experience of moving toward or from an asset is enhanced.

The Built Heritage Chapter provides a qualitative assessment of whether, how and to what degree setting contributes to the value of heritage assets. The level of detail is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal to their significance. It also describes the impact of the proposed development upon that significance, expressed as the 'magnitude of impact.'

The Council's Conservation Officer's response appears to conflate the mere presence of intervisibility with the existence of harm, thereby failing to distinguish between visibility and the effect of development on the significance of heritage assets. In doing so, the Officer repeatedly misapplies and misrepresents analysis contained within the Townscape and Visual Impact Assessment, which is intended to assess visual change and townscape effects, rather than heritage impact in terms of significance and setting. This results in a consistent conflation of the distinct methodologies and purposes of the 'heritage'

² *Pagham Parish Council v Arun District Council* [2019] EWHC 1721 (Admin) (04 July 2019), as per Andrews, J DBE

and 'townscape and visual impact' assessments, leading to conclusions that do not properly reflect the principles set out in policy and guidance, whereby visibility or change in views does not, in itself, equate to harm to heritage significance.

Loss of Grass Verge and Impact to Assets

BGT comment on the loss of the grass verge located on the southern boundary of the Site. The open character of which, they state, provides clear and direct views of Forbury Gardens and St James' Church complex; as well as enhancing the settings of the nearby listed buildings. Both consultees have requested for better provision of the green open space which "*would be best provided along the southern half of the site to reduce the adverse impact on the historic assets to the south.*"

Montagu Evans has the following observations in relation to this judgement.

First, the Inner Distribution Road was cut in 1969. It does not have a historic relationship with the heritage assets. The views of the church and prison along its duration are not designed.

Second, accepting that new views may contribute to the significance of an asset, despite being created incidentally, it is important to understand the way in which the views may be impacted. The view along Kenavon Drive or Forbury Road would be experienced kinetically, with the relationship to the church and prison changing as the observer moves closer and navigates the various bends in the road. At no point along the road would the church or prison be entirely obscured from view. Moreover, for the majority of the approach the entirety of the east elevation to the church will be perceived. The proposed development would not obscure these clear and direct sight lines.

Furthermore, where visible in conjunction with the proposed development, the setting of the heritage asset would be vastly improved by the proposed development. The existing surface level car park is of poor visual amenity. The provision of a new, more densely landscaped frontage to the Site would improve the visual amenity in this location.

The Design Code Document (reference:18-111 Kings Meadow View-Design Codes) submitted as part of the application, outlines the approach to public realm on page 44 of the document. This illustrates several different public realm character areas, including 'Plummery Gardens', an informal street tree frontage and garden and Plummery Garden Plazas; both of which align the southern boundary of the Site. Thus, this aspect of the proposals provides a considerable frontage between the main road and built form, allowing for an improved green, pleasant setting to the heritage assets located opposite.

Views through the Site and setting of heritage assets:

As outlined above, in our approach to the heritage assessment, and the contribution made by setting, the proposed development is not considered to be located within an element of the heritage assets' setting that contributes to its significance. The Site, in its current form, comprising utilitarian retail warehouses and a vacant hard standing, detracts from the setting of the heritage assets listed above.

BGT have commented on the layout of the blocks and the proposed building line set in parallel with the ring road which would result in the loss of views from within the Site and the heritage assets opposite.

- Reading Gaol
- St James Church Complex
- Forbury Gardens
- The Abbey Ruins

It is important to point out that existing views from within the Site are limited to those heritage assets directly on the southern boundary of the Site, the plummery wall, Reading Gaol, St James' Church and associated presbytery and Forbury Gardens. Views of heritage assets located further south, in particular the former Reading Abbey gate and Reading Abbey ruins, are obstructed by the interposing built form and therefore there is no existing visual interaction between the Site and these assets. Furthermore, the views from within the Site to the surrounding heritage assets are not locally designated views and therefore are not considered to be significant views of the heritage assets.

A number of design mitigation measures have also been undertaken to reinforce the open character of the Site and ensure the linear views to the north and south are retained. This includes a tapering in height to the buildings located on the southern boundary of the Site as well as separation distances set out within the parameter plans which thus allow for a series of north-south linear views through the Site, to the heritage assets located to the south.

Planning Balance

RBC and BTG conclude that the proposed development would give rise to harm to Forbury Gardens RPG, Reading Gaol, St James Church Complex and the Reading Abbey Ruins. In contrast, Historic England was consulted, although their letter advised that in this case, they do not wish to comment on the application and suggested they do not need to be consulted again, unless the design of the proposals is significantly changed.

The harm identified by RBC is 'less than substantial' using the terminology set out in the NPPF, but RBC reserve any judgement on what scale of less than substantial harm. RBC allege that there are no heritage benefits to the scheme. Whilst the Built Heritage ES Chapter found no harm to any of the heritage assets considered within the assessment - therefore not triggering the NPPF tests in relation to harm - the Planning Statement prepared by Montagu Evans sets out the planning benefits of the scheme, which are considered to outweigh any perceived less than substantial harm.

Notwithstanding, for the reasons set out in the Built Heritage Chapter and this letter, it is our judgement that the proposed development would not harm the significance of any heritage assets in the study area.

Should the decision maker conclude that the proposed development does give rise to harmful effects then they must be treated considerable importance and weight given to the desirability of preserving the special interest of the designated heritage assets.

Paragraph 213 of the NPPF advises the grant of consent only where there is a clear and convincing justification to harm. It has taken another judgment by Mr Justice Gilbart in *Pugh*³ to explain how one construes such a justification. Mr Justice Gilbart found that such a clear and convincing justification comprised the balance of planning benefits set out in paragraph 196 (now 215). Where public benefits outweigh the identified harm, then permission may be granted subject to a proportionate assessment being undertaken.

Yours Sincerely,



Montagu Evans LLP

³ *Pugh v Secretary of State for Communities and Local Government & Ors* [2015] EWHC 3 (Admin)