



10 June 2026

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Sent by email from [REDACTED]
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Dear Jonathan Markwell

Planning Application: PL/25/1706

Forbury Retail Park Forbury Road Reading RG1 3JD

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.

Thank you for reconsulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens (RPG), in this case Forbury Gardens Grade II. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.

We are in receipt of Montague Evans' submission to RBC on 20th May 2026 setting out their position on heritage matters in response to our previous comments on 24 February 2026 and those of RBC's Conservation Officer and RCAAC. Our earlier comments on the historic, policy and development context of this site remain. We do not repeat these here.

Response to Montague Evans 20/5/26

1. Significance of the Forbury Gardens and Abbey Quarter

RBC have acknowledged the high level of historic significance of the Abbey Quarter through current and emerging Local Plan policy. Its significance in part lies in the combination of three very different important historic assets developed over time which make a significant statement about the history of the town. There is no equivalent in Reading.

We accept that the setting of the Abbey Quarter and Forbury Gardens has changed considerably since the last of these assets was introduced and that modern medium rise buildings contribute to the setting to the north and east. However, the relative openness of the site provides an important break in the built form and enables the skyline above Forbury Gardens to be defined by the historic assets: the church and prison.

2. Setting

The site clearly meets the NPPF definition of Setting in that it makes a significant contribution to experiencing the Gardens, both from within the gardens and in overlooking the gardens from the west in particular. The current low rise and open car park frontage character makes little or no impact on this experience, in contrast to the medium high buildings to the east and north. Referring to Montague's definitions, the current effect of the existing site on the asset is neutral.

The site also meets the definition of Significance in NPPF. *The value of a heritage asset to this and future generations because of its heritage interest.* RBC have identified this value.

Significance derives not only from a heritage asset's physical presence, but also from its setting. The remainder of the Abbey Quarter clearly makes a significant contribution to the the setting of the Gardens. We do not say that the site in its current form contributes to the significance of the Gardens. The issue lies in the harm arising from the proposed new form, mass and scale and layout of development. It fails to conserve or enhance the setting.

3. Effects of the mass and scale of development

Please our letter of 24 February 2026. We confirm that we believe that the proposed mass and scale of the development completely fail to respect the character and historic importance of the Abbey Quarter, and would be far in excess of the height of the Prison. It is not in accordance with RBC policies EN1 or CR15.

4. Green space

We are confused by Montague Evans' reference to BGT comments in February 2025 on the loss of the grass verge located on the southern boundary of the Site. We can find no reference to this. Our concerns set out in February 2026 are:

The applicant states that *Reoriented blocks define two clear public spaces and strengthen the east-west route through the site.* However, these do no more than create a winding, albeit quite wide, hard surfaced movement corridor through the site and do not conform to the objectives of CR13b.

We have expressed our concern about the lack of green open space being provided to accompany new high rise residential development. The Scheme provides hard surfaced areas but does not meet the need for genuine green open space. The absence of this (notwithstanding the offsite river, canal and meadows the other side of the river and railway line) puts significant pressure on the Forbury Gardens for recreation and leisure activities. Given its historic significance, the delicate combination of beds, shrubbery and grass, and existing popularity, this is not sustainable and the RPG will suffer.

We believe that the height should be reduced further and the number of blocks reduced, and that a far greater area of green open space and tree planting should be provided opposite the prison to create a much better setting to the Abbey Quarter and RPG.

5. In response to specific points by Montague Evans [italics]:

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.

This may be so, but the IDR, its paths and roads leading into it provide opportunities for the public to appreciate the historic assets.

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.

We do not agree with this statement in any way or form for the reasons set out in our February comments and in this letter. A thin strip of landscaping along the roadside would not mitigate the harm from the development. Depending on the nature of the development, the provision of substantial open green space (covering the area of the car park) might do so,.

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.

For clarification BGT has not expressed any concern about views from the site. We are however concerned about views across or from within Forbury Gardens where the gardens, garden features and the historic setting are towards the site. As we explained, these blocks (as proposed) are all close together, creating a building mass which, when viewed from the RPG will appear taller than the adjoining high buildings and completely fill the gap. This would create a wall of high buildings surrounding the Abbey Quarter, filling its background when viewed from the RPG. This would be over-bearing and result in significant harm to the setting of the Abbey Quarter, including Forbury Gardens.

Montague Evans refers to a number of mitigation measures, but these are not adequate to avoid harm to the significance of the RPG and its heritage setting for the reasons explained.

Concluding comments

To reiterate, we do not object to the redevelopment of this site per se but consider that this development, even as revised, is not appropriate and is not in accordance with Local Plan Policy EN1 and CR15 nor NPPF 2024 Chapter 16 and in particular paras 202 and 213. Reading Borough have complied with NPPF 203 in designating the Abbey Quarter and recognising the historic value of the RPG and this should afford considerable weight.

Although the proposed buildings fall below 12 storeys, the buildings of 6-11 storeys create a development with a mass and scale that would have a significant impact and are wholly out of keeping with the built form and character of the Abbey Quarter and Prison. Together with the existing medium high buildings, the proposed development would result in a significant cumulative effect, harming local character and the important heritage assets.

We believe that, not only should the height be reduced further and the number of blocks reduced, but a far greater area of green open space and tree planting should be provided opposite the prison to create a much better setting to the Abbey Quarter and RPG.

We appreciate that the existing site does not have outstanding townscape qualities, but the open parking area and low nature of the buildings have a neutral impact on the heritage setting. There is considerable room for improvement, but as Reading is serious about conserving and enhancing its historic assets at the Abbey Quarter, this site needs to be very sensitively redesigned to minimise the harm and contribute to enhancing the setting of these assets.

NPPF

The scheme does not meet NPPF 213: *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

Nor does the proposal meet the requirements of NPPF 219: *Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.*

The scheme does nothing to enhance or better reveal the significance of the Abbey Quarter and the Forbury Gardens. Overall, the development is contrary to NPPF.

Yours sincerely



Bettina Kirkham, Chair and Planning Advisor of the Berkshire Gardens Trust
cc: The Gardens Trust; Chair Reading Conservation Area Advisory Committee