

## Donna Williams

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**Subject:** FW: 55 Vastern Road, Reading (200188)  
**Attachments:** 200188 - Transport and Policy comments Oct2020.pdf; 200188 Environment Agency response 127747-02.pdf

**From:** Markwell, Jonathan <[Jonathan.Markwell@reading.gov.uk](mailto:Jonathan.Markwell@reading.gov.uk)>

**Sent:** 22 October 2020 14:45

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**Subject:** 55 Vastern Road, Reading (200188)

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Dear Ms McHardy / Mr Pettit,

Further to previous correspondence, most substantially the affordable housing letter from Ms McHardy on 14/10/2020, I write with an update on this application. Having discussed the contents of the affordable housing letter with various colleagues, I can advise that, put simply, the offer, and moreover the terms attached to such an offer are not acceptable to officers. As such, officers conclude that there are a number of fundamental elements associated with the proposals which are unresolved and there appears, despite the extensive discussions which have taken place (both at pre-application and application stage) to be little sign or scope for these matters being satisfactorily resolved or progressed. Whilst acknowledging that you have sought to provide responses and more information in relation to a variety of matters, in short these have not brought about the level / nature of changes to the scheme which officers have consistently advised are required to progress the application with a positive officer recommendation.

Accordingly, I can advise that it in discussion with my managers, I will now proceed to compile and complete my officer report recommending refusal of the application.

My managers have discussed this with members, who have confirmed that (in accordance with changes to the scheme of delegation in April 2020) the application will be determined under delegated powers by the agreed deadline of 05/11/2020. Whilst officers would have far preferred to reach a position which would have enabled a positive officer recommendation to be made to committee, and this has always been our intention from the outset in a positive and proactive manner, there are simply too many fundamental concerns with the proposals which remain unresolved to enable that to happen. Accordingly, this point in time appears a natural and reasonable point to effectively agree to disagree on a number of matters and determine the application accordingly.

With specific regard to your affordable housing letter of 14/10/2020, officers have significant concerns with the offer itself, summarised as including:

- As detailed previously, a 0% affordable housing position, based on viability, is not agreed by officers.
- There appear to officers to be inherent difficulties in getting grant funding from Homes England if the 20% shared ownership is not reported as on-site affordable housing in any officer committee report / s106 legal agreement. Officers consider there is no clear way for your on-site affordable housing offer not to be reported or recorded.
- The lack of a deferred mechanism is not agreed, bearing in mind emerging SPD guidance and the proposed offer not providing the policy compliant 30% level of affordable housing.

- 20% shared ownership units represents a 0/100 tenure split, contrary to the 70/30 split referenced in supporting text to Policy H3, or 62/38 split referenced in emerging SPD. The non-provision of the rented tenure in the offer is of concern in relation to policy.
- As an aside, no details of the mix or location of the proposed units are detailed, so it is unclear if they relate to a single block, or part of one (and associated service charge concerns from RPs)

In addition, the terms (referenced as assumptions in your letter) attached to the offer are further areas of concern. For example, in terms of energy/ EA matters, please see separate sections of this response below. Regarding being considered at Planning Applications Committee on 04/11/2020 for approval, it was verbally communicated to Kim Cohen at Barton Willmore on 16/10/2020 that the application would not be ready to be advanced to committee positively on 04/11/2020 in light of the range / nature of additional information submitted (or yet to be submitted, given it was advised that energy based information would be forthcoming, which duly followed on 19/10/2020).

Given officers are not agreeable to your affordable housing offer and your letter details that housing offer was on a without prejudice basis, I will assume that this offer is withdrawn by you and officers will revert to consider the proposals on the basis of your original 0% affordable housing (due to viability reasons) proposal.

Regarding the application as a whole, I can advise that the future reasons for refusal are likely to include the following:

- Not providing sufficiently high quality north-south link through the site and related safety, directness concerns - including connecting to the site to the south, largely due to the alignment of the site/buildings (primarily contrary to Policies CR11ii and CR11g and the RSAF, but also EN11, CC7, CR2, CR3 and TR3 / TR4) \*see Transport and Planning Policy advice notes attached for more details.
- Servicing / internal vehicle movements impacting on pedestrian and cycle safety - more specifically, reversing movements over this proposed pedestrian and cycle route (primarily Policies TR3 and TR4) \*see Transport advice note attached.
- Car parking layout leading to potential conflict between vehicles and pedestrians/cyclists (primarily Policies TR3 and TR5) \*see Transport advice note attached.
- Insufficient justification on the impact of the height of the proposed buildings fronting onto the River Thames on the river and resultant impact on shading of the Thames, impact on marginal habitats and lack of a sustainable long-term relationship between the riverside buildings and large canopy trees. The EA sent a further response on 16/10/2020 maintaining their objection (attached), and previous concerns raised by the RBC Ecology consultant remain unresolved in terms the proposals being in conflict with Policy EN11 in particular, and also EN12, CC7 and CR2. In terms of the information submitted on 13/10/2020, it is initially advised that officers do not consider that option 2 (additional marginal planting) put forward by the EA is sufficient to address current concerns (as previously advised by RBC Ecology i.e. the development would be harmful to the waterspace and the mitigation hierarchy of avoiding harm has not been followed) and the EA's option 1 (reduce the size of the buildings) should be followed. Had officers considered option 2 to be appropriate in principle, the off-site location proposed on the northbank of the Thames by Reading University Boat Club would not have been suitable in any event, given the need to maintain the launching station for the boat club to the river at this point. It is also noted, for information, that based on the single initial plan submitted, it is unclear whether the proposed planting would have been in the river itself (floating option), or whether the intention would have been to provide planting on the land (riverbank) element, or indeed alter the alignment of the riverbank at this point. Inherently linked to these concerns the Natural Environment officer has further considered the proposals following the latest response from the EA. In light of the maintained concerns, officers reiterate earlier concerns raised regarding the height and proximity of the buildings to the river not allowing sufficient space for a successful long-term relationship with large canopy trees within the riverside buffer (contrary to EN13, EN14 and objectives of the adopted and revised Tree Strategies). The current proposals do not allow a long term sustainable relationship between the riverside buildings and large canopy

trees and therefore it is considered that this forms a component can reasonably be included in an overall condition dealing with the detrimental impact on the Thames environs. The provision of green roofs to the building, previously raised by the Natural Environment officer, is also unresolved.

- Lack of sufficient justification for proposed 0% affordable housing & a s106 legal agreement to secure suitable affordable housing and associated deferred mechanism, together with a related obligation whereby affordable housing would be applied on a cumulative basis should the buildings subsequently be extended / altered (to create further units) or units sub-divided in the future (contrary to Policies H3 and CC9, together with current and emerging Affordable Housing SPD).
- \*Proposed energy strategy not sufficiently demonstrating that it is not suitable, feasible or viable for the inclusion of decentralised energy / future connections to nearby sites within the cluster area (primarily Policy CC4 and guidance within the sustainability SPD) \* This is under review further to your submission of additional information on 19/10/2020, which is presently being considered.
- Failure to demonstrate a suitable quality of accommodation for future occupiers - through reasons of: the mitigation measures proposed are not adequate to minimise the impact of nearby noise pollution (i.e. the response from 24 Acoustics received on 05/10/2020 is not accepted) and possibly wind impacts too (the further information submitted on 14/10/20 is currently under review) - contrary to policies CC8, EN16, CR6.
- In light of the above concerns, officers are in the process of re-reviewing the impact of the demolition of the locally listed building, bearing in mind the benefit of the proposals in relation to the wider public benefits of the scheme against the heritage value of the non-designated heritage asset in the planning balance. In short, the harm of demolishing the locally listed building has not been outweighed by the benefits of the proposals.
- \*Lack of a section 106 legal agreement for an ESP, open space contribution, carbon offsetting financial contribution (based on your submitted proposal), affordable housing (based on your submitted proposal - as detailed separately above) and various transport based components \* Without prejudice to any future application or appeal, you are advised that these reasons could be overcome by entering into a Section 106 Legal Agreement or unilateral undertaking for a scheme that was in all other respects acceptable.

In terms of next steps, officers will no longer be considering any further material submitted by you on this application. Naturally, you are advised of your right of appeal. Alternatively, you may prefer to withdraw the application prior to a formal decision being issued. If this is your preferred approach, please advise me in writing (by email) by 9am on 02/11/2020. If I do not hear from you by 9am on 02/11/2020, I will assume that you wish for the decision to be issued.

Although this feedback will naturally come as a disappointment to you, I hope that this update is nevertheless of assistance to you. Please note that I am on leave during week beginning 26/10/2020, returning on 02/11/2020.

Yours sincerely,

Jonathan Markwell

Principal Planning Officer

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200188 - 55 Vastern Road, Reading

Further comments from Darren Cook, Transport Development Control Manager

Facilitating connectivity and permeability

The applicant has stated that by providing a route through the development site and removing the existing barrier of the existing buildings that it is complying with Policy CR11g and the RSAF and continues at paragraph 4.3 to state:

*Wayfinding will be an important element to the strategic route as pedestrians and cyclist journey from the station to Christchurch Bridge. It is not possible to look down the entire route from the station given the urban form across the two development sites and such a route was not envisaged as part of the RSAF or Local Plan. Therefore, clear and visually legible wayfinding will be provided as a key element of the proposals, increasing permeability in the area.*

However, the Reading Station Area Framework includes numerous illustrative diagrams that clearly illustrate what can only be described as a straight visual link between the station and the river and I explicitly refer to paragraph 7.10 which states the following:

*The new development will result in new views being opened up within the Station Area itself. Of particular significance are views along the direct north-south link, between the Station and the Thames, where there should be an unbroken line of sight.*

It is therefore clearly evident that the RSAF required a straight route to help facilitate clear and legible wayfinding to the Christchurch Bridge and beyond.

Also, in relation to this Policy, and I appreciate that not all of the site is coming forward at this time, but the development proposals in isolation do not meet this Policy objective. I highlight the visual taken from the Strategic Shared Cycle Footway document submitted by the applicant which identifies that from some way into the site you still cannot see the river with pedestrians / cyclists reliant on signage through the development for wayfinding. I would therefore suggest that the development would be contrary to Policy in this regard.



### Providing visual interest

This is more of a planning matter as opposed to a transport concern.

### Safety

The proposal fails to identify why the proposed layout would be any safer than a direct route through the site. As previously stated the creation of a direct ramp to the bridge would reduce conflict with vehicles within the site and no evidence has been provided confirming that a straighter route would result in conflict between pedestrians and cyclists. I have confirmed in writing and at meetings with the applicant that Christchurch Bridge already includes straight ramps on either side and the Highway Authority have no knowledge of any speeding cyclists, conflicts or concerns along this existing route and therefore do not believe that any conflicts would arise from providing a direct / straighter route within the site.

It has previously been stated by the applicant that the development will increase the density of pedestrian movements given residential flows attributed to the development. However, Local Transport Note 1/20 Cycle Infrastructure Design states the following on shared use design:

*6.5.9 Research shows that cyclists alter their behaviour according to the density of pedestrians - as pedestrian flows rise, cyclists tend to ride more slowly and where they become very high cyclists typically dismount. It should therefore rarely be necessary to provide physical calming features to slow cyclists down on shared use routes, but further guidance on this, and reducing conflict more generally, is given in Chapter 8, section 8.2.*

As I alluded to within the meeting there could be other design features that could aid reducing speeds if this was necessary including the alignment of the route on the podium in the same way as the 90° turn does on the southern side of the bridge and as was included within the initial designs at the pre-application stage.

The Highway Authority are therefore not provided with any justification to suggest that the proposed route has any greater safety benefit than a more direct route.

### Directness

The applicant has questioned the meaning of direct in the Policy context stating that the Policies do not specifically refer to direct meaning 'straight' and that the provision of the proposed new route would be direct when compared against the existing convoluted routes between the station and Christchurch Bridge.

However, as is highlighted above and included at 7.10 of the Reading Station Area Framework the development must provide an unbroken line of sight along the direct north-south link and as such is clearly stating that this must be as straight as possible. I appreciate that the application is not for the whole site and that this line of sight is not going to be achievable but this should not alter the Policy requirement to provide a link that is as straight and direct as possible.

I would also clarify that my latest comments have requested a straighter route than has been illustrated to date, it does not specifically request a straight route even though this is what the Policy stipulates. The route is being diverted from the straight route identified in the Reading Station Area Framework due to the site layout but to compensate for this the pedestrian / cycle route must be as direct as possible within the site itself, as such the removal of the switchbacks and a direct ramp would be a Policy requirement.

It has also been stated by the applicant at Paragraph 4.17 of the Policy Assessment Note: North/South Shared Pedestrian Cycle Route that:

*In the context of technical design a single ramped section to provide a straight route for cyclists would be inappropriate. Policy conflicts of this approach notwithstanding, this route would lead onto Vastern Road and it would not be possible to achieve a shallow enough gradient and a maximum ramp length of less than 30m, to avoid speeding/safety concerns which would conflict with the interchange with Vastern Road.*

However, if this were the case then technical drawings should be provided that confirm this to be the case, from the initial pre-app discussions and submitted plans the ramp would not extend anywhere near Vastern Road. As part of the previous meeting with the developer planning officer Jonathan Markwell mentioned to the developer that it would be worth providing a comparison between the application proposal as is against a more direct route through the site, this is so that the Council can assess the visual relationship with the rest of the development. This is something that the developer does not appear to have undertaken. However, if the developer is stating that a direct route would not be able to be achieved it is imperative that this be provided for the Highway Authority to

review. Please note that my brief assessment of this appears to establish that the route would not extend any further than that illustrated at the pre-app stage and therefore would be contained within the site.

Overall I am not convinced that the proposed scheme fully complies with Policy by which it does not provides a direct line of sight route through the development and no evidence has been provided to suggest that a straighter direct route be detrimental to the safety of pedestrians and cyclists. It should also be stated that paragraph 5.4.6 of the Local Plan states:

*In particular, on the Riverside site (CR11g), achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management.*

The development should therefore be designed around the footway / cycle route instead of the footway / cycle route having to fit around the development.

#### Comments on Stantec Technical Note TN006

#### **Internal Vehicle Access Arrangements**

Although movements by delivery vehicles may be low on a daily basis they are still of a frequent regularity. The applicant has stated that this would be between 0 and 1 HGVs per day, including refuse collection and this would equate to between 3 and 4 per week including refuse collection. It has been stated that delivery vehicles can drive over the footway / cycleway in forward gear and reverse from a position that would not require a full reversing movement over the pedestrian / cycle route. However, this is requiring all drivers to undertake this manoeuvre and depending on where they are delivering to they may undertake the opposite manoeuvre resulting in a delivery vehicle reversing over this route. The Highway Authority still therefore have concerns regarding the servicing of this site and reversing movements over this proposed pedestrian and cycle route.

#### **Design of Access to Southern Towpath**

The proposal for the alteration in designation to include cycling along the towpath is at an advanced stage with public consultation already taking place and adjustments being made to the statement of case ready for submission. The provision of cycling along the towpath is also included as a proposal within the Local Cycling and Walking Improvement Plan (LCWIP). The route through the site will be the main north south link to / from the towpath and the north via the bridge and therefore the development must provide both links so that a comprehensive strategic cycle routing network be provided and not a case of providing completely separate links depending on where you are travelling to or from. The cycle



route should travel through the site and then spur off at a point within the site to facilitate an east or west movement along the towpath, although links to the towpath are available this should not be a reason for the developer to not provide a comprehensive cycle route through the site linking to the towpath.

### **Waste Collection Strategy**

I am happy with the assessment provided by the applicant.

### **Disabled Parking Bays**

As part of my previous comments I had asked the applicant to include locations where pedestrians can access the surrounding footways and requested that these be included on revised plans.

The submitted information now includes areas of hardstanding to the west of the bays which replace the existing landscaped areas. Although these areas will be of benefit to the users of these bays this does not address the previous query as to how pedestrians (although not explicitly stated previously included those with disabilities) will access the footways to the east, south and north i.e. will pedestrian dropped kerbs be provided?

### **Cycle Store Design**

A section drawing has been provided for Block D (448.PL.D.300A) to demonstrate the required headroom of 2.6m for josta stands is achieved and is therefore acceptable.

The cycle store positions/access points have been revised for blocks B, C and D following previous comments and these are illustrated on drawings 448.PL.BC.100C and 448.PL.D.100B. Having reviewed these drawings it is noted that access to these stores is through the bin store and would not be desirable and therefore dedicated external access doors should be provided.

In relation to Block C in particular the proposal now includes an increase in cycle parking to 22 cycle spaces when this block only requires a provision of 6 cycle spaces. This layout should be altered to reduce the cycle parking numbers and provide a dedicated access route.

Block D should also be altered as per Block C to provide a dedicated access route and I would propose this should be to within the internal car park. It is also noted that the cycle store provision is now 56 cycle spaces which is well in excess of the required number of 34 spaces and is accepted.

The changes to the bin and cycle stores for Block D does however have implications for the car parking layout and overall reduces the number of spaces to 30 from 31 to which the Highway Authority have no concerns. However, it is the car park layout that the Highway Authority has concerns about and in particular the two bays closest to the car park entrance which are likely to result in conflicting movements at this entrance as they will require more complex manoeuvres to access / egress them. These bays should be removed or the configuration altered to reduce the potential for conflict at this point. In addition, it is noted that the bay in the north east corner of the site although angled would appear to be provided with a restricted access due to the two adjacent bays, to ensure this bay is accessible tracking diagrams should be provided to confirm that a vehicle can access and egress the bay.

### **Vastern Road Crossing**

The applicant has provided a proposed design for the signalised crossing on Vastern Road which I have not assessed in any detail to date given that the location would need to be agreed with the developers of the Aviva site opposite to ensure that this crossing does not prejudice the delivery of that scheme.

I would also question whether the location of the entrance to the development is then appropriately placed given that it is located west of the proposed crossing facility. Given the requirement for sight lines through the development to the river this would at least require a view of the river from the point of landing on the northern side of Vastern Road at the very least.

The applicant has acknowledged that a new crossing in this location may deliver some benefits to the development, but in the main, this crossing would be used by existing people travelling between Caversham and Reading station/town centre. In addition, occupiers of the planned new developments immediately north of Reading station would also benefit significantly from such a crossing. Following discussions with the applicant and acknowledging that it is not solely the trips generated by the development that would require the provision of this crossing I am happy to accept a contribution towards it instead of it being delivered through a S278 Highways Agreement.

The applicant has provided an estimated cost for the crossing shown on drawing 47500/5500/SK030 as being between £100,000 to £150,000 and the applicant has proposed £50,000 contribution towards this facility. However, in a separate letter from Berkeley Homes received on 14/10/2020 the applicant has stated that they “would also like to offer an increased financial contribution of £200,000 to deliver the new pedestrian crossing on Vastern Road”. It is therefore unclear how/why the cost / contribution has changed so significantly in the intervening period?

## **55 Vastern Rd, Reading (200188)**

### **Planning Policy comments on link through site**

These comments from the Planning Policy team on application 200188 at 55 Vastern Road relate wholly to the north-south pedestrian and cycle link through the site, and respond in particular to the Policy Assessment Note from Barton Willmore dated 24<sup>th</sup> September 2020. No comments are provided relating to any of the other planning policy aspects of the proposal.

### **Relevant Local Policy**

The key local policy documents relevant to the link are the Reading Borough Local Plan (adopted November 2019) and Reading Station Area Framework (adopted December 2010).

#### **Reading Borough Local Plan**

##### ***Design***

Policy CC7 of the Local Plan provides general design policy across the Borough (including in the centre), and states that five components of development form, including *“layout: urban structure and urban grain”* should be assessed to ensure that a positive contribution is made to urban design objectives including *“Quality of the public realm and provision of green infrastructure and landscaping”*, *“Quality of the public realm and provision of green infrastructure and landscaping”* and *“Legibility - clear image and easy to understand”*.

Policy CC7 also states that developments will be assessed against other criteria including that they:

- *“Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
- *Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*
- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.”*

Policy CR2 includes additional policy for design of schemes in central Reading, which should be considered in addition to CC7. This emphasises the importance of the grid structure and ease of movement in criterion a, well designed public realm and convenient linkages in criterion b and the incorporation of green infrastructure in criterion c.

##### ***Open space and public realm***

The town centre is a high-density area with an increasing residential population and limited open space within its core. The site represents an opportunity to improve access to the riverside open spaces for those living in, working in or visiting the centre. Policy EN10 deals with the issue of access to open space, and states that:

*“In areas with relatively poor access to open space facilities (including as a result of severance lines), new development should make provision for, or contribute to,*

*improvements to road and other crossings to improve access to green space and/or facilitate the creation or linking of safe off-road routes to parks.”*

Policy EN11 deals specifically with waterspaces, and highlights that developments in the vicinity of watercourses will:

*“Provide appropriate, attractive uses and buildings that enhance the relationship of buildings, spaces and routes to the watercourse, including through creating or enhancing views of the watercourse, and create a high quality public realm;”*

Policy CR3 specifically relates to public realm in central Reading. It states that all sites of 1 ha will be expected to incorporate new public open space or civic squares. Criterion iii is also particularly relevant to this site, because it highlights the vital nature of legible links to the watercourses:

*“Development proposals adjacent to or in close proximity to a watercourse will retain and not impede existing continuous public access to and along the watercourses, and will provide legible continuous public access to and along the watercourses where this does not currently exist;”*

### **Cycling**

Policy TR4 deals with cycling, and expects that *“Developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities.”*

### **Central Reading Strategy**

The importance of north-south links through the centre, of which this site is an absolutely vital part, are clear in the strategy for central Reading. Among the key principles referenced in 5.2.1 are:

- “f. Access to the centre by foot, cycle and public transport will be improved.*
- g. Access within the centre by foot and cycle will be improved and barriers to this improved access will be overcome, particularly in a north-south direction through the core.”*

Paragraph 5.2.3 develops this further, identifying the need to overcome barriers to movement, particularly a need to emphasise a north-south link through the centre, linking to the Thames and adjacent parks, and Caversham. Figure 5.1 shows the strategy, and shows a clear, strategic north-south improved pedestrian and cycle movement through the middle of the site.

### **Site-Specific Policy**

This site is identified as part of CR11, the Station/River Major Opportunity Area. The vision for this area includes that *“it will integrate the transport links and areas northwards towards the River Thames and into the heart of the centre.”*

The overall policy criteria for the whole area provide further emphasis of this point, stating that development in the area will:

*“ii. Help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. North-south links through the area centred on the new station, including across the IDR, are of particular importance;”*

*...*

*v. Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames;”*

The site forms sub-area CR11g, and specific policy for the site includes that

*“Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the top of the bank of the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside.”*

The supporting text includes additional wording that is relevant, in particular when considering how a link should appear.

*“In terms of permeability, improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles for the spatial strategy of the centre, along with removing barriers to access within the centre. If visual links are also provided, this will help change the perception of the area north of the station as a separate entity.” (paragraph 5.4.6)*

Paragraph 5.4.6 also gives clear instruction on how the link should be weighed in determining applications on this site:

*“In particular, on the Riverside site (CR11g), achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management.”*

### **Reading Station Area Framework**

The Reading Station Area Framework was adopted in 2010, and applies to the wider station area including this site.

### **Status of the Framework**

The Local Plan makes clear that the Reading Station Area Framework (adopted 2010) continues to carry weight. It states in paragraph 5.4.9 that:

*“A Station Area Development Framework was prepared for most of this area in 2010 to provide more detailed guidance, and a Station Hill South Planning and Urban Design Brief covering sites CR11a, b and c dates from 2007. These documents continue to apply, alongside any future Supplementary Planning Documents.”*

The Policy Assessment Note, albeit acknowledging that the RSAF is afforded ‘some’ weight by the Local Plan, suggests in paragraph 2.1 that it has been ‘superseded’ by the NPPF and Local Plan, and also refer in paragraph 2.10 to it being based on an outdated policy context. For clarity, I would reject any assertion that the weight of the RSAF has in any way decreased since its adoption. There is nothing specifically in the NPPF that I would identify as having rendered its contents out of date, and, as discussed, the Local Plan makes absolutely clear that it will continue to apply. Most of the most relevant policies to this issue are continuations of previous policy in the Reading Central Area Action Plan. For instance,

relevant criteria (ii) and (v) of policy CR11 are slightly amended versions of (ii) and (v) of RC1 of the RCAAP, whilst the description of sub-area CR11g is clearly derived from the corresponding RC1g of the RCAAP.

In her Report on the Examination of the Reading Local Plan (September 2019), the planning inspector referenced that there was clearly a continuation of the overall strategy for central Reading in paragraph 86:

*“The strategy is a continuation of the partly implemented Central Reading Area Action Plan, and the overall approach for the Central Reading strategy is justified.”*

### **Overall priorities**

The RSAF recognises the importance of north-south connections from the outset of the document. In paragraph 2.18, it is recognised as one of the key challenges:

*“The major barriers to pedestrian movement include the rail tracks and the limited number of rail crossings, the Station Hill site, the large retail and post office sheds to the north of the tracks, the significant level differences across the area, and the enclosed electricity board site which blocks direct access from the Station to the riverside footpath and cycle way.”*

This is further emphasised within the Principles section, in paragraph 3.6:

*“The redevelopment of large sites provides the opportunity to secure landscaped public space and to extend public access. The layout of these will incorporate east-west and north-south routes to enhance movement and linkages across the area, whilst the construction of a pedestrian/cycle bridge linking the Area to Christchurch Meadows will further integrate and ensure good accessibility to adjoining open spaces.”*

### **Public realm**

Chapter 5 on Public Realm deals with the issue of north-south connections across the site. The aims of the section include *“‘Stitching’ together the various development sites within the Area both visually and physically”* and *“Creating more opportunities for sustainable forms of transport, particularly walking and cycling, by enhancing the connectivity and legibility of the area”* (paragraph 5.4).

Paragraph 5.5. recognises the challenges of enhancing connectivity due to changes in level across the area, but nevertheless states that it should be achieved insofar as is possible.

Paragraph 5.6 (and Figure 5.1) identify the Kennet-Thames spine as being one of the public realm priorities. Specific guidance on this spine is set out in paragraph 5.9:

*“A major ‘city spine’ - a direct pedestrian route - is proposed through the historic core, the Station Area and through to the Thames. This spine is based on the north-south link which is the most significant movement corridor in the RCAAP, and is vital to the success of development in this area. The spine will extend across the Thames with a new footbridge(s) and new riverside parks, which can act as amenity space for new residents. The spine will include enhancements including wider pavements and greater pedestrian priority in Station Road. North of the railway, the spine will incorporate a ‘green link’ towards the river. Buildings will face onto the spine rather than away from it, and, on all parts of the spine south of Vastern Road, the frontages will be enlivened with active uses including retail and leisure.”*

Chapter 5 also deals with the pedestrian grid, and, in paragraph 5.17, once again refers to the importance of the north-south connections. Figure 5.5 shows the proposed pedestrian grid, and shows a direct link through this site from the station to Christchurch Bridge. Paragraph 5.20 states that the Riverside site should be a location for pedestrian priority measures.

## **Views**

Chapter 7 on Views is not referred to in the Policy Assessment Note, but is nevertheless significant for consideration of the North-South route. In the section on shorter-distance views, paragraph 7.10 states that:

*“The new development will result in new views being opened up within the Station Area itself. Of particular significance are views along the direct north-south link, between the Station and the Thames, where there should be an unbroken line of sight.”*

Two specific views are identified, and shown on Figure 7.2 as follows:

- 62 - Station Square north looking north
- 63 - New public space on Thames looking south

The RSAF therefore clearly anticipates that there will be a high-quality visual link between the station and Thames, crossing this site.

## **Urban Design Framework**

In setting out an overall urban design framework, the RSAF identifies five key concepts, and once again the north-south connections are emphasised: *“Creating permeable development that strengthens north-south links and improves connectivity across the area”* (paragraph 8.3).

Figure 8.5, the Framework structure, shows the north-south link as the only ‘major path/pedestrian link’, and shows a direct link across this site linking two public spaces or important intersections at either end of the site, and then beyond across the Thames to the north and south to the station. This high-quality direct link is further developed in Figure 8.6, the Framework diagram.

In dealing with the Northside area in more depth, the three key elements of the public realm are identified as being the *“north-south spine between the station and Thames (and across the river), and two public spaces along the spine - a new Station entrance square, and a public space on the southern bank of the Thames”* (paragraph 8.16).

In paragraph 8.21, the Riverside site is identified as one of seven key sites in achieving the urban design framework.

## **Transport**

Chapter 11 deals with Transport, and this further emphasises the importance of the north-south connections, in this case for cycling. Paragraph 11.24 states that:

*“In particular, the development of the Northside area can provide new cycle links approaching the northern Station entrance, potentially separated where necessary. These should link in with the route network shown on the map accompanying the Cycling Strategy, and improve north-south crossing of Vastern Road.”*

Figure 11.11 shows that a new cycle route along this north-south axis directly through the site is expected.

## Summary

In summary, the following are the clear takeaways from local policy relating to the north-south link within the site:

- That the link is essential to the wider strategy and is the main priority for this site (*LP CR11 ii, CR11g, paras 5.2.1, 5.2.3, 5.4.6, Figures 5.1, 5.2; RSAF paras 2.18, 3.6, 5.6, 5.9, 5.17, Figures 8.5, 8.6*)
- That it should be high-quality (*LP EN11, CR11g*)
- That it forms an important part of overall public realm (*CR3, CR11 v, paras 5.6, 5.9, Figure 5.1*)
- That it is direct and legible (*LP CC7, CR3, CR11 v, Figure 5.1; RSAF paras 5.9, 7.10, Figures 5.5, 8.5, 8.6*),
- That it provides visual links (*LP para 5.4.6; RSAF para 7.10*)
- That it is landscaped (*LP CR2, CR11 v, CR11g; RSAF para 5.6*)
- That it provides enhanced cycling through the site (*LP TR4, CR11 ii, paras 5.2.1, 5.4.6, Figure 5.1; RSAP para 11.24, Figure 11.11*)

## Proposed link in context of local policy

It is recognised that the proposals represent an improvement over the current situation, where there is no access through the site at all. However, the development of this site is a one-off opportunity to secure a truly high-quality link through the site that must be seized. It is important to state that the quality of this link is not simply one of a number of competing priorities that must be weighed on this site, but, as Local Plan paragraph 5.4.6 makes clear, the main priority for the site, and must be considered accordingly.

The artificial division of the site into two ownerships and the retention of the electricity equipment clearly compromises the ability of the site to meet these priorities. However, even within the proposed site boundary, it is my view that not enough emphasis has been placed on the importance of achieving this high-quality direct link to reflect local policy, and this element of the proposal does not therefore comply with the policy on this link.

## Directness

The proposed link is not the most direct link possible, even when accounting for the shape of the application site.

The main problem is the presence of the 'Goods Office' plot, and the need to bring the route around this building and then further bend round to meet the end of the Christchurch Bridge. The northern end of this building protrudes into the proposed route, and creates additional deviation. In my view, the presence of the Goods Office building in this location is not compatible with achieving the most direct link through the site possible.

The extent of the Goods Warehouse also accentuates this issue, as it also extends westwards into the most direct route and presents a particular issue with directness for those crossing Vastern Road.



The switchbacks at the northern end of the site also contribute to the lack of directness. I am not best placed to comment on how this will work for cyclists from a technical point of view, but the presence of steps onto bends in the cycle route seem to lead to potential for pedestrian-cycle conflict. Wheelchair users would also be required to use the less direct cycle route. It is recognised that there is an issue with changes of level to land directly onto the footbridge, which is clearly a desirable outcome, and that an elevated walkway through much of the site would create issues in terms of relationship with building frontage, but a gentle, direct, DDA-compliant slope through the site would be easier to achieve, once again, without the Goods Office building.

Paragraph 4.14 of the Policy Assessment Note makes the comparison to the northern end of Christchurch Bridge, and rightly points out that there are indirect routes as it lands on Christchurch Meadows. However, there are important distinctions at this end of the bridge. Firstly, the Local Plan CR11 policies and RSAF do not apply here. Secondly, once north of the Thames, the desired routes start to fragment - north towards Gosbrook Road, northwest towards Caversham centre and west and east along the riverside. This compares to a single clear desire line on the south side of the bridge, towards the station and centre. Finally, even if the paths on the northern side are not direct, they are at least clear visually due to the open nature of the meadows, and pedestrians would not be prevented from taking the most direct routes across the meadows if they choose. This is not the case on the application site.

### **Visual link**

Contrary to paragraph 4.3 of the Policy Assessment Note, a visual link through the site and beyond was indeed envisaged by the Local Plan and RSAF, as highlighted in Local Plan paragraph 5.4.6 and, in particular, RSAF paragraph 7.10. The wider issue of legibility of the route is highlighted throughout both documents.

A consequence of the subdivision of the site is that it appears that a single visual link from the Station to the Thames would be very difficult to achieve. However, even if this is not achievable in full, efforts should certainly be made to keep visual fragmentation of the route to an absolute minimum. On the basis of the current layout, there seems to be at least three visual 'stages' between the station and Thames - from the south side of Vastern Road it appears that a pedestrian would be able to see into the site about as far as the Goods Office; once entering the site, visual links would extend to the southern edge of the Coal Drop Building; and only when approaching the crossing of the vehicular route might the Thames start to become visible. Once again, the main issue affecting visual links will be the Goods Office building, particularly its northwestern corner, although this also relates to the western extent of the Goods Warehouse.

Regardless of signage and wayfaring, for the route to be successful, the visual links should be as clear and direct as possible. Without such links, the route will be less attractive and therefore less successful.

### **Quality**

The comments on directness and visual links above also relate to the quality of the route. However, there is one additional point I would wish to make on the quality of the link.

My main concern is width. The Policy Assessment Note emphasises that a minimum 3m width has been specified, and this appears to be the width through much of the site. It is worth comparing the proposed link with other pedestrianised town centre streets. Chain Street, for example, although 2.7m wide at its northern entrance, for most of its length

exceeds 4m in width. Most of Union Street is up to 4m wide. Both of these streets have a distinct 'alleyway' feel, despite the buildings on either side being only 2-3 storeys, and cycling along them would be actively dangerous. Other town centre shared pedestrian/cycle routes, such as Kennetside, are also wider than 3m. None of these are regarded as key through routes in the town centre. Christchurch Bridge itself is more than 4m wide, so the route would narrow from that point as it enters the site. A 3m width may fulfil technical specifications, but it does not recognise the vital, strategic nature of this route.

The narrowness of the site also very much limits the potential of the route to be anything other than a through route, and will not help it to be a useable part of the public realm for, e.g, sitting.

### **Summary**

The link as currently proposed in the application does not comply with the Local Plan (in particular policy CR11) or the Reading Station Area Framework.

Mark Worringham - Area Planning Team Leader

Reading Borough Council  
Development Control  
PO Box 17  
Reading  
Berkshire  
RG1 7TD

**Our ref:** WA/2020/127747/02-L01  
**Your ref:** 200188  
**Date:** 16 October 2020

Dear Sir/Madam

**Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch bridge to Vastern road**

**55 Vastern Road, Reading RG1 8BU**

Thank you for consulting us on the above application, on 17 March 2020, and additional information submitted July –September 2020

We have reviewed the following documents:

We have reviewed the following documents:

- Flood Risk Assessment (FRA) produced by Stantec dated January 2020
- Landscape General Arrangement Plan (Drawing number 448.LA.101 Rev E)
- Planting Framework Plan (Drawing number 448.LA.102 Rev E)
- Letter with Appendix from John Barnes (eb7 ltd) to Joe Harding (Berkeley Homes (Oxford & Chiltern ) Ltd dated 14 July 2020 relating to additional sunlight/shadowing assessment work
- Phase I-II Geo-Environmental Site Assessment 55 Vastern Road Reading Berkshire RG1 8BU by Omnia dated November 2019
- The Old Power Station, Vastern Road, Reading Proposed Drainage Strategy by Stantec dated January 2020.

Additionally, we received the following document directly and have provided comments although this does not currently appear on the Reading BC planning website:

- E-mail from Joseph Harding (Berkely Group) to Environment Agency, dated 03 September 2020 with attached documents relating to the sunlight assessment

**Environment Agency position - Biodiversity**

We **maintain our objection** as set out in our original response dated 14 April 2020 (ref. WA/2020/127747/01-L01)

Cont/d..

## **Reason**

At this time, we would be unable to remove our objection with regard to the shading impact of the proposed development. It would not be acceptable for it to go ahead in its present form without mitigation, particularly due to the fact that there is very little marginal habitat through this section of the Thames.

### Letter with Appendix from John Barnes (eb7 Ltd) to Joe Harding (Berkeley Homes (Oxford & Chiltern) Ltd dated 14 July 2020

We received a copy of this letter from Joseph Harding in July 2020 and commented as follows:

“The scale indicated for the number of hours of sunlight on the river in the Appendix one graphics is too coarse to be useful. Looking back at the earlier Daylight & Sunlight Report (eb7, dated 19 December 2019) submitted with the application, this contained graphics showing transient overshadowing (Appendix 5). The use of this technique might give greater clarification of the impact of the shadowing that might result from the proposed development. We are unsure why this methodology was not used and why an hourly representation for a representative day (e.g. in April, June, August) was not included as was provided in the earlier report.

Given that shading looks to be increased it would also be useful at this stage to see a shade arc on representative days (e.g. in April, June, August). This would give an idea of the height of the shadow. Does it reach the other side? The sunlight hours and shade arc should also be done for a scenario where the building is lower in height next to the river and taller buildings set back from the river to see if that increase can be avoided.”

### E-mail from Joseph Harding (Berkeley Group) to Environment Agency, dated 03 September 2020 with attached documents relating to the sunlight assessment

We received additional information with regard to the sunlight and shadowing assessment our comments were as follows:

“Having reviewed the additional information supplied relating to the transient shadow paths from March-September, the issue of shading of the river and the marginal planting along the river bank adjacent to the development has been clarified.

Comparing the shading between the existing situation and the proposed development it would appear that there would be a significant reduction in sunlight reaching this area, from our interpretation. With no development, it would appear that this area receives 6 to 7 hours of sunlight per day, but with the proposed development, this would be reduced to between 2 and 3 hours, which is likely to reduce the vigour of this planting and may result in the loss of some species”.

## **Overcoming our objection**

Option 1 would be to reduce the height of the buildings and/or set them back further from the river. This has been raised previously. The usual rule of thumb would be to have the building set back from the bank top the same distance as the height of the building to prevent shading of the river and river bank. While this is the best option for preserving the footbridge mitigation planting and riverbed habitat, we do realise this may not be the preferred option.

Option 2 would be to see additional marginal planting installed as a combination of mitigation and ecological enhancement in recognition of the impact of shading. We would also like to see shade tolerant plants added to the footbridge planting area to allow for succession to a shadier environment.

There are a number of locations that could be explored for this additional marginal planting on either side of the river. Ideally, upstream between the footbridge and Caversham bridge. We believe that much of this land is under the ownership/control of Reading Borough Council and so any discussions regarding this should include the relevant Reading BC representative.

### **Environment Agency Position – Flood Risk**

We are pleased to see that you have used the most up to date flood model data to inform your Flood Risk Assessment (FRA). We are also pleased that the FRA includes reference to the new (as yet not yet published) Thames Mapledurham to Hurley 2019 modelling.

We are satisfied that the FRA confirms a design flood level of 38.30mAOD based on the 1 in 100 plus 35%. This level is used to inform mitigation proposals in the form of compensatory floodplain storage. Fig 4.1 (Modelled extents with allowance for climate change) provides a really useful illustrative drawing of how the design flood event will impact the site presently. It uses modelled levels from the River Thames in comparison with detailed topographic survey data for the site. This shows that the site is impacted by the 1 in 100 plus 35% design event to the north of the site (adjacent to the river) and to a small portion to the South East of the site.

We are satisfied that there is a commitment to safety of the development within the FRA by proposing to set Finished Floor Levels (FFLs) of the new buildings at a minimum of 38.60 metres AOD thereby providing a degree of resilience above the design flood level.

In line with best practice, we would normally expect a developer carries out level for level compensation for any loss of flood storage up to the 1 in 100 plus 35% flood level. The compensation provides an additional volume of floodplain storage at each 100mm depth band up to the final band as detailed on plan 47500/4001/003 Flood Storage Analysis. At this highest band we note a 'loss' of 6.7 m<sup>3</sup>. However, the overall benefit of the flood compensation being provided is 118 m<sup>3</sup> and provides significant betterment at all water levels up to the final band. We also note that due to the topographic constraints within the brownfield redevelopment it has not been possible to offset this minor change in floodplain storage during the highest order floods. In this specific instance we are therefore satisfied with the compensation provided.

The report notes that proposals to reduce the impacts of flooding in north Reading and Caversham are being developed. These design proposals take account of potential future flood alleviation works. This follows discussions with the developer and their consultant to ensure that the development proposals allow for integration of future works to a pre discussed design standard. We therefore recommend the following condition.

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is included.

### **Condition**

The development shall be carried out in accordance with the submitted flood risk assessment and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 38.60 metres above Ordnance Datum (AOD)
- Compensatory storage shall be provided *in accordance with* plan 47500/4001/003 Flood Storage Analysis

- These design proposals take account of potential future flood alleviation work

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/ phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

### **Reasons**

- To reduce the risk of flooding to the proposed development and future occupants
- To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided
- To ensure the structural integrity of the *or proposed* flood defences thereby reducing the risk of flooding

### **Environment Agency Position – Contaminated land**

Given that the site investigation found relatively low levels of contamination it is expected that limited remedial works will be required from the perspective of controlled waters. In addition as the proposed drainage solution is not proposing to use infiltration there is unlikely to be any mobilisation of contaminants within the soils. There is still a slight uncertainty that the cable oil leak that affected the adjacent site may have impacted the margins of proposed development site, therefore we request the following conditions.

### **Condition 1**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

### **Reason**

There is a known cable oil spill on the adjacent site which may have crossed the boundary.

- To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

### **Condition 2**

The development hereby permitted may not commence until such time as a scheme to

- secure de-watering of the site
- specify the form of foundations

Has been submitted to, and approved in writing by, the local planning authority. The scheme shall be fully implemented and any changes as may subsequently be agreed, in writing, by the local planning authority.

### **Reason**

To ensure that the proposed development, piling does not harm the water environment in line with paragraph 170 of the National Planning Policy Framework

**Advice for Local Planning Authority**

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, we will recommend the inclusion of ground contamination, biodiversity and flood risk conditions on any subsequent approval.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

**Final Comments**

We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours faithfully

Kirsty Macpherson on behalf of

**Miss Michelle Kidd**  
**Planning Advisor**

Direct dial 02030259712

Email [planning\\_THM@environment-agency.gov.uk](mailto:planning_THM@environment-agency.gov.uk)