

55 Vastern Road, Reading

Statement of Case

(Reasons for refusal 1,2 and 6)

Prepared by Michael Doyle

Appeal to the Secretary of State against the decision of Reading Borough Council under section 78 of the Town and Country Planning Act 1990.

LPA Application Reference: 200188

for
**Reading Borough
Council**

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1 Introduction

1.1 Personal details

1.1.1 This Statement has been written by Mr Michael Doyle BA (Hons.), Dip. UD Dip.TP, MRTPI. Mr Doyle holds a Bachelor of Arts degree with honours in Urban and Regional Planning from Coventry University, a Post Graduate Diploma in Urban Design from Oxford Brookes University, and a Post Graduate Diploma in Urban Planning from Westminster University.

1.1.2 He has 37 years of experience as a town planner, urban designer, and heritage consultant. He is a Chartered Member of the Royal Town Planning Institute, an Affiliate Member of the Institute Historic Building Conservation, and the Urban Design Group.

1.1.3 Mr Doyle was the principal author of the Reading Station Area Framework for Reading Borough Council (RBC). He worked as part of the RBC team to develop Reading Rail Station and the public realm framework for the Station setting and public transport interchanges. He worked as part of the team that determined the position, alignment, and form of the Christchurch Bridge.

1.1.4 Mr Doyle is familiar with the appeal site and the surrounding area and knows the planning policy background and relevant issues to this appeal.

1.1.5 The opinions expressed in this statement are his.

1.2 LPA decision

1.2.1 The Planning Application was reported to RBC's Planning Committee on 31st March 2021 ('the Committee Report'). An update to Committee was published on 31st March ('the Update Report'). RBC determined the Planning Application on 9th April 2021, where the application was refused with seven Reasons for Refusal ('RfR') identified.

1.3 Scope

1.3.1 This statement addresses urban design matters, specifically the RfR relating to the design of the scheme:

1. RfR 1 – North-south link.
2. RfR 2 – Height and Proximity to the River Thames and Thames Path.
3. RfR 6 – Comprehensive Development.

1.3.2 My assessment will address the urban design, townscape and placemaking issues relating to this proposal. I will focus on the layout, scale, form, and height of the proposals, the response to the site's existing character and context, the quality of the design proposals, and how they interface with the existing area. I will examine whether the scale, massing and siting of the proposed development are appropriate to its riverside context and whether the extent of its impact is appropriate in design terms. I will consider whether the appeal proposals can contribute to or hinder the comprehensive development of a wider area.

2 North-south link

2.1 Reason for refusal 1

Failure to provide a high-quality north-south link through the site and related public realm, safety and directness concerns largely due to the alignment of the site/buildings primarily contrary to Policies CR11ii and CR11g and the RSAF, but also policies EN11, CC7, CR2, CR3 and TR3 and TR4.

2.2 Description of proposed north-south link

2.2.1 A route through the site for pedestrians and cyclists is proposed, leading from the River Thames and Christchurch Bridge to Vastern Road (the 'North-South link'). The link forms a middle section of a longer link extending from the Town Centre through the Rail Station to Christchurch Meadow and Caversham.

2.2.2 The first section of the proposed north-south link at the Appeal site entrance from Vastern Road travels between Blocks A and B and is pedestrian and cycle only. A dedicated footway/ cycleway path, typically 3m wide, travels along the eastern side of an internal access road. Vehicular accesses to parking areas below Blocks B and D bisect the route in two places. A new ramp ascends from the general site ground level up to a podium level. It then dips down to connect with the southern end of Christchurch Bridge with a short linking bridge. The ramp is a 'switchback' arrangement with intermediate levels partly determined by the need to meet the positions and entrance levels of the various residential blocks. The switchback arrangement has been designed to travel up to and across the podium level adjacent to Block D (The Turbine Hall). The lower level incorporates vehicle parking and servicing areas. A small café with an outdoor seating area and landscaping sits at a raised level adjacent to the Thames.

2.2.3 A further ramp extends down to the Thames Path.

2.2.4 The alignment of the North-South link is cranked at the mid-section so that there is no direct visual link from Vastern Road through to the riverside.

2.3 Officers report

2.3.1 I do not propose to thoroughly rehearse all sections of the Committee Report or repeat the various policy references in full.

2.3.2 In summary, the following are relevant areas of the report:

- Policy CR11, Figure 5.3 and supporting text; Policy CC7; Policy EN11; Policy TR3; Policy TR4; Policy CR2; Policy CR3.
- Spatial Strategy for Central Reading (section 5.2), including Figure 5.1; and
- The Reading Station Area Framework, in particular paragraphs 2.18, 3.6, 5.4, 5.6, 5.9, 5.17, 7.10, 8.3, 8.16, 8.21 and 11.24 and Figures 5.1, 5.5, 7.2, 8.2¹, 8.6 and 11.11.
- Paragraphs 4.1 to 4.36 of the Committee Report details the policy response.
- The Officers advice on the north-south route (paras. 4.6- 4.50, 4.25.3, 6.19 - 6.20).

2.3.3 I will refer to and comment in more detail on several relevant areas raised by officers.

2.4 Members' discussion

2.4.1 I have reviewed the online broadcast of the committee item.

2.4.2 The Members were unanimous in their view that an appropriate and effective north-south link should be straight and direct, that this was '*fundamental to the scheme*' (Cllr. Page), the proposed route was '*not compliant*', took the '*long way round*' and '*doubled back*', the link should be delivered '*above all*' (Cllr. Rowland).

2.5 Policy

2.5.1 The RfR 1 refers to Local Plan policies CR11ii, CR11g, EN11, CC7, CR2, CR3 and TR3 and TR4 and the Reading Station Area Framework (RSAF).

Revised NPPF

2.5.2 There are several changes to the NPPF relevant to RfR1.

¹ The Planning Policy Team response reproduced in paragraph 4.31 of the Committee Report contains an error in referring to Figure 8.5 of the RSAF when it should have referred to Figure 8.2, which is clear from the text of the response.

- 2.5.3 The definition of social and environmental objectives of sustainable development have been revised and updated in paragraph 8. The social objective has introduced beauty as a requirement:

“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.”

- 2.5.4 Beauty is not defined. However, the new National Design Guide (NDG) subtitle is titled ‘*Planning practice guidance for beautiful, enduring and successful places*’. It follows that the careful application of that guidance will result in places that can be defined as beautiful. Paragraph 5 of the NDG clarifies that beauty in a place ‘*may range from a long view down to the detail of a building or landscape*’.

- 2.5.5 The NPPF has been updated to include reference to the NDG and National Model Design Code (NMDC) and the use of area, neighbourhood and site-specific design guides.

“These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.” (para. 129).

- 2.5.6 The NDG and NMDC, therefore, have weight in decision-making.

- 2.5.7 The example of a ‘safe and accessible’ place given in NPPF Paragraph 92b has been amended to refer to; attractive, well-designed, clear, and legible pedestrian and cycle routes (revised text underlined).

- 2.5.8 The criterion in paragraph 106(d) has been amended to state that planning policies should provide high-quality, attractive and well-designed walking and cycling networks.

- 2.5.9 Paragraph 131 emphasises the importance of trees to the character of an area and the quality of environments.

- 2.5.10 Significant weight should now be given to development that reflects local design policies - such as the Local Plan and RSAF. Developments that fail to reflect local design policies and government guidance on design should be refused (NPPF paragraph 134):

“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any

local design guidance and supplementary planning documents such as design guides and codes.”

2.5.11 Significant weight should also be given to:

“a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

National Design Guide

2.5.12 The NDG forms part of the Government’s collection of planning practice guidance. It should be read alongside the separate planning practice guidance on the design process and tools (NDG para. 3).

2.5.13 Direct routes help to prioritise pedestrians and cyclists, whilst good sightlines create routes people want to use (NDG para 82 - Active Travel):

“Prioritising pedestrians and cyclists means creating safe, direct, convenient, and accessible routes for people of all abilities. These are designed as part of attractive spaces with good sightlines, and well chosen junctions and crossings, so that people want to use them.”

2.5.14 ‘Safe and direct routes’ with ‘visible destinations or clear signposting’ encourage people to walk and cycle. (NDG Section M2 Active Travel para. 83). The inset diagram (NDG page 23) shows a straight route and text at NDG Para. 83 states:

“For pedestrians and cyclists, direct links create good connections to public transport and promote active travel, particularly where they are along routes with low levels of vehicular traffic.”

National Model Design Code

2.5.15 Part 1 of the NMDC summarises some of the key principles contained in the guidance notes. Paragraph 58(ii), Active Travel, highlights that new development should

contribute to the creation of well-lit, direct and overlooked pedestrian and cycle routes” (emphasis added).

- 2.5.16 Paragraph 18 of M.1(i), ‘The Street Network’, defines the characteristics of a ‘connected’ street network:

“A connected street network is... direct, allowing people to make efficient journeys. Direct routes make walking and cycling more attractive and increase activity, making the streets feel safer and more attractive.”

- 2.5.17 Section M.2(i), ‘Walking and Cycling Routes’ (para. 34), which relates to making walking and cycling the first choice for short, local journeys, states:

“For local journeys, this means creating continuous, clear, relatively direct and attractive walking and cycling routes both within a large site and into the surroundings. Following desire lines can help make routes clearer. Good sightlines aid wayfinding.” (emphases added).

- 2.5.18 Diagram 45 within section I.1 (A Sense of Place) includes the following guidance:

*“**Well-proportioned streets:** The width of the street and the height of the buildings relate to its place in the street hierarchy.”*

- 2.5.19 Paragraph 144, within P.3 (Security and Public Space), states that neighbourhoods should be designed in accordance with Secured by Design principles. These principles are set out in diagram 64, and this includes the following:

*“**Safe routes:** Creating safe routes that are as straight as possible, wide, well lit, without hiding places and well-maintained and overlooked for security and provide a sense of security for all users”* (emphasis added)

Local Plan CR11

- 2.5.20 Policy CR11 covers the Station/River Major Opportunity Area. The vision statement (LP para. 5.3) introducing policy CR11 includes to; *‘integrate the transport links and areas northwards to-wards the River Thames and into the heart of the centre’.*

- 2.5.21 Development in the Station/River Major Opportunity Area will help facilitate greater pedestrian and cycle permeability, particularly on the key movement corridors. The

north-south links through the area centred on the new Station, including across the IDR, are particularly important (CR11(ii)).

- 2.5.22 The development of the wider Station area allows the significant improvement of north-south links through the centre. It offers the opportunity to expand the core of the centre northwards to help meet development needs. (LP para. 5.4.3).
- 2.5.23 The link is identified in Figure 5.3 as a key movement corridor. Improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles of the spatial strategy. This is *'particularly important'* on the route between the shopping core, the Station and the Thames. 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 (LP 5.4.6).
- 2.5.24 The design and quality of the north-south link are not simply among several competing priorities that must be weighed on this site. Local Plan paragraph 5.4.6 clarifies this is the main priority for the site and must be considered accordingly.

CR11g

- 2.5.25 The Appeal Site forms the greater part of 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."

RSAF

- 2.5.26 The RSAF (Reading Station Area Framework) is an adopted Supplementary Planning Document that continues to carry weight (LP para. 5.4.9 and Officer Report para. 4.18-4.20).
- 2.5.27 The importance of North-South connection is recognised (figure .4.21 - extracted from the earlier RCAAP), and the key challenge is (para.2.18):

“The major barriers to pedestrian movement include... the enclosed electricity board site which blocks direct access from the Station to the riverside footpath and cycleway.”

2.5.28 This is further emphasised within the ‘Principles’ section (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.”

2.5.29 RSAF Chapter 5, 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).

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

2.5.31 Paragraph 5.6 (and Figure 5.1) identify the Kennet-Thames spine as 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.”

2.5.32 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 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.

2.5.33 Chapter 7 of the Frameworks deals with views (para. 7.10):

“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.” (my emphases).

2.5.34 Figure 7.2 indicates the origin and alignment of a proposed new view marked ‘63 - New public space on Thames looking south’. A reciprocal view is shown: ‘63 - Station Square north looking north’.

2.5.35 It is important to note that the ‘unbroken line of sight’ described in Chapter 7 extends from the Station to the Thames, with Figure 7.2 further defining that it be between a ‘new public open space on the Thames’ and the ‘Station Square’. It is not, as the Appellant suggests, from the rail station building entrance to Christchurch Bridge. The position and configuration of these two public spaces determine where the unbroken line of sight can and should be formed.

2.5.36 The RSAF contains an urban design framework identifying five key concepts. Once again, the north-south connections are emphasised (para. 8.3):

“Creating permeable development that strengthens north-south links and improves connectivity across the area.”

2.5.37 Figure 8.5, the Framework Structure, shows the North-South link as the only ‘major path/pedestrian link’ with a direct link across the Appeal Site between two public spaces or important intersections at either end of the site. The link extends across the Thames in a northerly direction and towards the Station in a southerly direction. This high-quality direct link is further developed in Figure 8.6, the Framework Diagram.

2.5.38 The three key elements of the public realm at ‘Northside’ (north of the railway lines) are: (i) The north-south spine between the station and Thames (and across the river),

and two public spaces along the spine; (ii) a new Station entrance square; and (iii) a public space on the southern bank of the Thames” (paragraph 8.16).

2.5.39 The Riverside site is one of seven key sites to achieve the urban design framework (para. 8.21).

Local Plan EN11

2.5.40 EN11 seeks the protection and enhancement of Reading’s waterspaces (LP EN11) so that they contribute (among several features) to local character, heritage and visual amenity, the provision of accessible leisure and recreational opportunities. The policy wording is emphatic:

‘There will be no adverse impact on the functions and setting of any watercourse and its associated corridor’. (LP EN11)

2.5.41 Several criteria define acceptable development in the vicinity of watercourses in LP EN11:

- *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;*
- *Make positive contributions to the distinct character, appearance, historic significance, landscape and amenity of the watercourses;*
- *Provide a strengthened role for watercourses as important landscape features, wildlife corridors, historic features and recreation opportunities;*
- *Wherever practical and consistent with its biodiversity role, provide good, level access to and along the waterside for all those who want to use it;*
- *Be set at **least ten metres** back from the watercourse wherever practicable and appropriate to protect its biodiversity significance;*
- *Improve the quality of watercourse environment through protecting and enhancing habitats and ensuring that habitat creation is balanced with access and urban uses; and*
- *Pursue opportunities for deculverting of watercourses.*

Local plan CC7

2.5.42 LP CC7, Design and The Public Realm, promotes high design quality. The various components of development form are described, followed by several relevant urban design objectives:

- *Continuity and enclosure*
- *Quality of the public realm and provision of green infrastructure and landscaping*
- *Ease of movement and permeability*
- *Legibility - clear image and easy to understand*

2.5.43 Developments will also be assessed to ensure that they (among several criteria):

- *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.*

LP CR2 Design in Central Reading

2.5.44 CR2 refers to a 'City Centre Framework' (CCF), published in 2002, that set out an urban design framework for the central area. The CCF provided the basis for much of the Central Reading section of the Local Plan.

2.5.45 Applications for development within Central Reading should build on and respect the existing grid layout structure, provide 'continuity and enclosure, frontages that engage with the street at lower levels and contribute towards enhanced ease of movement through and around the central area (LP CR2a).

2.5.46 Development is to provide well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscaped areas, and public art that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas (LP CR2b).

2.5.47 Where possible, development should provide green infrastructure designed to enhance the otherwise very urban environment (LP CR2c).

LP CR3

- 2.5.48 CR3(i) requires all proposals on sites of more than 1 hectare within the Central Reading boundary to provide new public open space or civic squares integrated with surrounding development.
- 2.5.49 The Allocated Site (CR11g) exceeds 1 hectare.

TR3 and 4

- 2.5.50 LP TR3, Access, Traffic and Highway-Related Matters and LP TR 4, Cycle Routes and Facilities, are addressed in the Highway Authority's SoC.
- 2.5.51 The North-South link will form a significant link in the transport network. Policy TR3 states that:
- "In determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment."*
- 2.5.52 I note that proposed works must (i) 'comply with the adopted standards of the Transport Authority' and proposals must not be (iii) 'detrimental to the safety of users of the transport network, including pedestrians and cyclists'.
- 2.5.53 I note at TR4 that developments should make full use of opportunities to improve access for cyclists; integrate cycling through the provision of new facilities; and maintain, enhanced, and add to or extend such routes. Where opportunities exist, improvements to routes, including connecting routes and/or cycling facilities, will be sought.

Policies not referenced in Rfr 1

- 2.5.54 LP EN10 is not referenced in Rfr1. However, this policy is relevant and points to the importance of links to open space such as Christchurch Meadows - one of the most significant open space areas in or near the central Reading area.

"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.” (EN10)

2.5.55 One of the purposes of the north-south link is to help break down the severance lines of the rail lines and the IDR to improve access to open space at Christchurch Meadow.

2.5.56 RfR 1 does not explicitly refer to CR11(v), which states:

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

Strategy for Central Reading

2.5.57 Local Plan para 5.2, Strategy for Central Reading, sets out key principles for the area (para. 5.2.1). These include: (d) the centre will make the most of its waterside areas as a destination for leisure and recreation; (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; and (h) Development in the centre will benefit from and contribute towards forthcoming major transport improvements.

2.5.58 The principles are directly relevant to the appeal site such that the appeal site may be characterised as **vital** to the realisation of the strategy for Central Reading.

2.5.59 The Local Plan (para. 5.2.3) explains the nature of the challenge.

“Ten years ago, the picture of the centre was one of fragmentation, with barriers such as the IDR, the railway and the River Thames blocking pedestrian movement in many parts, together with uninviting linkages between other parts of the centre.”

2.5.60 The Plan outlines the degree of success to date in realising the North-South link with a new underpass under the station, a new pedestrian and cycle crossing of the Thames and improvements to the public realm along streets such as Station Road (LP para. 5.2.3). It also defines the future challenge in realising the Central Reading Strategy

“...barriers such as the IDR still exist, and the spatial strategy will continue to seek to overcome these barriers, particularly through expansion of the centre northwards

beyond the centre. Emphasising a north-south link through the centre will help to link the centre to the Thames and its adjacent parks, to Caversham and to the rest of Reading.”

2.6 Area of agreement

2.6.1 Excluding the layout, height, and massing in relation to the riverside and riverside open space (see RfR 2), the architectural quality, details and materials of the proposed buildings addressing the north-south route are high.

2.6.2 The development provides ‘active frontages’ onto the route.

2.7 Main areas of difference

2.7.1 The Appellant maintains there is no requirement in policy or guidance for a straight link and direct line of sight through the Appeal Site and, in any case, the configuration of the Appeal Site boundary prevents this: This is disputed.

2.7.2 The Appellant maintains there is no satisfactory alternative to a proposed switchback pedestrian and cycle ramp arrangement: This is disputed.

2.7.3 The Appellant maintains that the width of pathways along the link and the space between buildings through which the route passes are sufficient and appropriate to the purposes and status of the link: This is disputed.

2.8 Assessment

2.8.1 I set out my assessment of the proposals for the north-south link in light of policy under the following broad headings:

- The strategic importance of the link.
- The purposes of the north-south link.
- Alignment/directness.
- Alternative route alignments.
- Alignment and configuration of ramps.
- Landscape.

- Width.
- Visual links.
- Quality of the public realm.
- Cycling.
- Wayfinding.

2.9 The strategic importance of the link

- 2.9.1 Providing a high-quality north-south link for pedestrians and cyclists across the Appeal Site is crucial to the successful development of this site and the wider RSAF area. I believe the Appellant has failed to provide a link that is sufficiently strategic in scale and ambition.
- 2.9.2 The link is strategic in nature and is essential to the broader strategy for the Riverside site, the station area, and the town centre. It 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). It is, therefore, central to the success of the Local Plan as a whole, the Reading Central Area, the Station/ Riverside Area and the Riverside allocated site (CR11g).^{2, 3}
- 2.9.3 The aim of policy and guidance is not simply that the link improves upon the current situation. Any link whatsoever would represent an improvement. Paragraph 5.4.6 of the Local Plan states: 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 (my emphasis).
- 2.9.4 The Appellant's SoC Appendix 12 (para. 5.9) acknowledges the '*strategically important landscaped link between the station and the river*'.
- 2.9.5 SoC Appendix 12 comprises an assessment of the north/south shared pedestrian cycle route dated 24th September 2020 prepared following a meeting held on Monday 14th

² Local Plan CC6, CC7

³ Local Plan – policies CR11 ii, CR11g, paragraphs 5.2.1, 5.2.3, 5.4.6, Figures 5.1, 5.2; Reading Station Area Framework – paragraphs 2.18, 3.6, 5.6, 5.9, 5.17, Figures 8.2, 8.6

September 2020. I note that section 2.1 (referring to 4.1 of the RSAF) points to a *'strategic-scale key corridor of movement which passes through the Site'*. I welcome the Appellant's acknowledgement that the link is strategic-scale, a key issue in this Appeal.

2.10 The purposes of the north-south link

- 2.10.1 The overall success of the spine from the Town Centre to the River is dependent upon each section or link playing its full part, including the link through the Appeal Site. A chain is only as strong as its weakest link, and I believe the Appellant has failed to provide a satisfactory link through the Appeal Site such that this compromises the routes as a whole - and the Appeal Scheme will, therefore, act as a 'throttle'.
- 2.10.2 The LPA's case is that the proposed link is not fully fit for purpose, and I fully agree with this position. However, it can be successfully reconfigured within the confines of the site boundary (see Figure 12, Figure 13, Figure 14, and Figure 15). I, therefore, fail to understand why the Appellant adopts the position, and marshals evidence, to demonstrate this is impracticable or unreasonable.
- 2.10.3 Policy and guidance point to several purposes of the link. Therefore, the Appeal proposals can be judged on whether the scheme fulfils these purposes: connecting high-density residential districts to open spaces⁴ reconnecting rivers⁵ and a strategic walking and cycling route from the central core through the station to the River Thames⁶.
- 2.10.4 Medieval Reading was founded at the confluence of the Thames and the Kennet. The relationship to (and links between and along) the rivers were steadily eroded up to the twentieth century. The aim now is to reconnect the rivers to and through the central area and break down the rail lines and inner distribution road barriers. The North-South spine is the main spatial element in this strategy.
- 2.10.5 A main purpose of the link, set out in the RSAF, is to connect high-density residential districts to Christchurch Meadows. The success of the proposed high-density residential neighbourhoods is dependent upon easily accessible open space.

⁴ RSAF Ch. 3.6

⁵ RSAF 5.6 and Dig. 5.1

⁶ Local Plan CR11 and 5.4.3

2.10.6 The link is to provide for enhanced walking and 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). I deal with this further below and also refer to the Highway Authority's SoC.

2.11 Alignment/directness

2.11.1 I dispute the Appellant's claim at Appendix 12 para. 4.2. The scheme has not fulfilled the specific requirement *'for a link through the Site as identified in Policy CR11g and paragraph 5.9 of the RSAF'*. They have not *'satisfied the aspiration of improved connectivity'* or provided a *'direct pedestrian route'* incorporating a pedestrian/cycle link, removing the barrier to travel between the River and Station. The scheme is therefore not compliant with Policy CR11g and the RSAF.

2.11.2 Policy and guidance are clear that the link through the Appeal Site should be direct and legible (LP CC7, CR3, CR11 v, Figure 5.1; RSAF paras 5.9, 7.10, Figures 5.5, 8.5, 8.6) ⁷

2.11.3 The Appellant's SoC Appendix 12 para 4.12 states: *"For completeness, reference to 'directness' meaning 'straight' has not been found within any of the key policies or guidance"*. This position can only be asserted by ignoring or misrepresenting the policy wording and accompanying diagrams.

2.11.4 Appendix 12 para. 3.9. acknowledges that; *'it is important that visitors are able to also navigate this strategic route from the station to the river'*. The Appellant's remedy is a wayfinding strategy as an alternative: But this is an insufficient alternative to providing the most direct link possible.

2.11.5 The alignment of the North-South link is part of a larger, strategic north-south axis. The overall strategy for central Reading requires that the link is attractive to, and used by, substantial numbers of pedestrians and cyclists. A direct and straight link between two points in an urban area will be more attractive and, therefore, more likely to be used. Indirect routes are perceived as longer, more tortuous and less appealing and therefore less likely to be used.

⁷ Local Plan – policies CC7, CR3, CR11 v, Figure 5.1; Reading Station Area Framework – paragraphs 5.9, 7.10, Figures 5.5, 8.2, 8.6

2.11.6 There are already indirect walking and/or cycling links between the Thames and the station – via Lynmouth Road, Norman Place and others. I would describe these as ‘local’ routes. The requirement for the Appeal Site is different in scale and strategic importance. A direct route is required so that foot and cycle traffic crossing the Thames will be naturally drawn towards Christchurch Bridge along a route they will follow intuitively and almost automatically.

2.11.7 The Appellant’s SoC seeks to argue that the term ‘direct’ (which is used in CR11 (v) and paragraphs 5.9 and 7.10 of the RSAF) should not be interpreted as meaning ‘straight’ but should instead relate to distance and time (see 3.50 of the SoC). The general meaning of direct is straight:

“Direct means moving towards a place or object, without changing direction and without stopping, for example in a journey.” (Collins Dictionary)

“going in a straight line towards somewhere or someone without stopping or changing direction” (Cambridge English Dictionary)

“going straight to a place and not stopping or changing direction on the way there” (Macmillan Dictionary)

2.11.8 The Appellant’s SoC (see paragraph 3.54 and paragraph 6.15 of Appendix 14) identifies plans within the RSAF where a curved route or a route with changes in direction are shown, specifically Figures 4.1 and 11.11.

2.11.9 Figure 4.1 is from the Reading Central Area Action Plan (adopted 2009) but is superseded by the Reading Borough Local Plan 2019. Following diagrams such as Figures 8.2, 8.3 and 8.6 consistently show a straight link between the Station and Thames, and the Local Plan includes Figure 5.3, a direct replacement for Figure 4.1, which also shows a straight link.

2.11.10 A straight link should be provided through the Appeal site except where insurmountable site constraints prohibit this. I see no such constraint and can only conclude that the indirect route results from the Appellant’s preferences, the brief they have provided to their consultants and their unwillingness to amend the scheme when this is entirely practicable.

- 2.11.11 I attach several sketches (see Figure 12; Figure 13 and Figure 14) demonstrating that nearly all the Appellant's development preferences can be realised whilst providing a straight route through the site (and a direct line of sight from Vastern Road to the Thames)⁸.
- 2.11.12 I do not accept the Appellant's assertion (Appendix 12 para. 4.12) that *'this is clearly a macro level aspiration for a key movement corridor, to connect the different areas of central Reading with the northern areas'*. Policy and guidance on the alignment of the route are specific and detailed, not *'aspirational'* (or in any other sense vague or optional).
- 2.11.13 The Appellant's discussion on the meaning of 'direct' (Appendix 12 para. 4.12) is superfluous because the RSAF and local plan diagrams explain the exact meaning of direct in clear spatial terms at the site-specific scale.
- 2.11.14 The Appellant defines the meaning of direct (Appendix 12 para 4.12) as *'the shortest and fastest way from one place to another'* and refers to a Government Transport Note that is specific to cycling only. I disagree with the Appellant's assertion (Appendix 12 para. 4.12) that *'it is considered that the route has been designed to be as straight as possible given site constraints'*. However, the sentence does seem to accept that as straight a route as possible should be provided. The Appeal Scheme involves many changes in direction and areas of conflict and congestion that involve stopping (see Figure 3, Figure 4, and Figure 5). Figure 3 highlights at least three changes in direction (indicated by a star), even taking the most direct route via the stairs. There are just too many for the Appellant to sustain the argument that they have been reduced to a bare minimum.
- 2.11.15 Appendix 12 para 4.14 states: *"The delivery and facilitation of this route along this desire line, cannot, therefore, be considered to be anything other than 'direct'"*. This seems to suggest that any old alignment roughly following the strategic scale 'desire line' will comply with the policy.

⁸ To note that these are 'proving drawings' that explore a specific urban design question- a 'line of inquiry'. They are not fully developed alternative schemes proposed or supported by the LPA.

2.11.16 It is not correct to state that the route was conceived 'at the strategic scale'. A route from the Station to the River connecting to a new footbridge across the Thames was first proposed at least twenty years ago in a detailed masterplanning study by Gibbs (see Figure 20) for an area covering the current station footprint northwards to the Thames. The idea was further developed in detail in the Initial Development Framework of 2002, which I drafted (see Figure 21) and a City Centre Framework Study in 2002 (see Figure 19). The concept of a direct (meaning straight) link was developed at the site-specific level over two decades ago. The Appellant can surely have been in no doubt about the correct interpretation of the policy and guidance.

2.12 Alternative route alignments

2.12.1 The Appellant's case is that no reasonable alternative route alignment can better fulfil the requirement in policy and guidance for a direct physical link and straight line of sight through the Appeal Site. I cannot agree because the Appellant has not fully explored alternatives or convincingly discounted other options.

2.12.2 The Old Power Station, Design Addendum 12th November 2020 Part 1 (SoC Appendix 9) seeks to demonstrate 'Unachievable Route Options'. This study is severely limited because its starting point is a mischaracterisation of policy and guidance. The study is founded upon the mistaken assumption that there is a requirement for a direct visual link from the southern Rail Station entrance to Christchurch Bridge, and the north-south link should travel in a straight line from the Station entrance to the southern abutment of Christchurch Bridge.

2.12.3 As noted in the policy section above, Chapter 7 of the Frameworks deals with views (para. 7.10) and seeks **views along the direct north-south link, between the Station and the Thames, where there should be an unbroken line of sight** (my emphases). However, as noted above, Figure 7.2 (see Figure 2 Appendix A of this document) provides greater specificity on the alignment of the proposed new view marked '63 - New public space on the Thames looking south'. A reciprocal view is indicated. '63 - Station Square north looking north'. *Therefore, the 'unbroken line of sight' is from the 'new public open space on the Thames' and the 'Station Square'.* It is not, as the Appellant suggests, from the Rail Station entrance to Christchurch Bridge. These two new squares' position and

configuration (and reconfiguration) determine where the unbroken line of sight can and should be formed.

2.12.4 The Appellant's alternative route study fails to apply the guidance and does not include Figure 7.2 from the RSAF.

2.13 Alignment and configuration of ramps

2.13.1 The Appellant claims there is no other practical configuration or alignment of ramps and stairs leading from a riverside public space to the Christchurch Bridge. I disagree with this claim. The Appellant has carried out a puzzlingly narrow assessment of alternatives (SoC Appendix 9- 'Design Addendum') that fails to identify and appraise several options that do not require any major layout reconfiguration (see my Figure 12 for example). The Appellant then relies upon a post hoc rationalisation of the scheme as submitted.

2.13.2 Appendix 12 para 4.14 states: *'Looking at the micro scale of the route, the introduction of the proposed switchbacks is not considered to obstruct the route, slow pedestrians or cyclists down to an unacceptable level, or impact the route's directness.'* This focuses on the effect of the switchbacks on the directness of the route when this is only one part of the indirectness that is of concern. The switchback arrangement introduces two complete changes in direction. Indirectness also relates to the two other cranks in the alignment of the route and the ramped link down to the riverside path.

2.13.3 SoC Appendix 12 para 4.13 states: *'It is noted that on the northern side of Christchurch Bridge a route which is not entirely straight at the micro scale, due to the provision of switchbacks and junctions, has been considered appropriate. This evidently does not impair the directness of the route from Christchurch Bridge to Caversham.'* There is no switchback ramp on the northern side of the footbridge. Three routes radiate out from the bottom of the bridge ramp, the routes travel through a wide-open space, not a constrained one, and the angle of the radiating routes are far from the acute bends the Appellant proposes. In any case, there is no single destination on the north side of the Bridge, as routes towards central Caversham, Gosbrook Road and along the Thames are required. This is not the case at the southern end of the bridge.

- 2.13.4 Appendix 12 para 4.18 states: *'Given the variety of challenges, it is additionally noted that paragraph 5.5 of the RSAF acknowledges challenges in achieving all of the identified aspirations relating to the public realm, particularly due to level changes (see paragraph 2.13 above).'* Other than rejecting an in-line ramp down from the bridge level travelling through the site, there is no evidence of any more comprehensive option generation or appraisal in the appeal documents. It should be noted that some of the Appellant's difficulties are self-imposed in selecting a podium parking structure with switchback ramp and open space above: SoC Appendix 12 reads instead as a defence of the only option fully considered.
- 2.13.5 Appendix 12 para. 3.7 refers to *'gentle deviations (that) are introduced to the route to maintain a DDA compliant route at 1:21 or less throughout the Site'*. The definition of a 'gentle deviation' is being stretched, in this case, to close to 170-degree turns.
- 2.13.6 SoC Appendix 12 para. 3.7 states the switchback route is *'supplemented by shorter and more direct, stepped pedestrian routes that provide a more convenient pedestrian journey: These more direct pedestrian routes should also reduce the number of pedestrians using the cycle footway through the section, which includes 'switchbacks'*. The pedestrian route via the steps is, in my view, far from direct.
- 2.13.7 Soc Appendix 12 para. 3.8 states: *'The switchbacks themselves widen to 4m to provide safe manoeuvring space for all users and moreover stepped pedestrian routes within the switchbacks, will reduce the number of pedestrians using the cycle footway through the switchback section.'* I cannot see how step users can avoid the switchback sections. The 4m 'safe manoeuvring space' includes zones of direct conflict between café users, wheelchair users, walkers (at different speeds and including children and babies in buggies travelling to the park), cyclists and bench sitters.
- 2.13.8 Appendix 12 para 4.18 states: *'Moreover, paragraph 8.2.11 of the Government's Local Transport Note (see paragraph 2.22 above), notes the need to encourage cyclists to slow at certain points in (inter alia) areas of high localised pedestrian activity. Given the dual nature of the route, in needing to cater for both cyclists and pedestrians, this is an important part of the route, which the switchback design adequately provides without*

the need for cyclists to come to a stop.' This presents a binary choice between an inline ramp and a switchback when several hybrids could have been explored. An example is attached (see Figure 12).

2.14 Landscape

2.14.1 The policy requires that the route is landscaped and provides a 'green link (LP CR2, CR11 v, CR11g; RSAF para 5.6).⁹ Exemplar photographs included in the RSAF (Page 27 middle bottom and page 53 right-hand side) give examples of the character and qualities of green links. Figure 22 illustrates an example of a green link through residential development taken from Natural England's Green Infrastructure Guidance.

2.14.2 SoC Appendix 12 para. 3.11 states: *'The route weaves through pockets of grass slopes and terraces that provide resting points and small areas of informal recreation, as advocated by Policy CR11'*.

2.14.3 The two small, grassed areas proposed extend to 73 sq m and range in width from 2.8 - 4m. I would describe these as small fragments of very low or no utility as informal recreation space. CR11(v) points to additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the Station and the River Thames. The proposals fall far short of this. The policy does not advocate 'resting points' and 'small areas of informal recreation'. The policy is far more ambitious in pointing to *'green infrastructure including a direct landscaped link' (CR11v)* and a *'green corridor' (CR11g)*.

2.14.4 I find that the detailed landscape design of the route is generally successful and appears attractive in CGI images. However, this does not compensate for the fact that the total area of soft landscaped spaces (grassed areas and other planting) is small in relation to the total area of the route and the riverside public space and is too small and fragmented. I accept that the total open area is limited, and more urban characteristics may predominate in the southern and middle sections of the site. However, the landscaped area in the northern third of the site, the riverside public space and riverside landscape strip is limited because the ramps have been squeezed and bent to fit the

⁹ Local Plan – policies CR2, CR11 v, CR11g; Reading Station Area Framework – paragraph 5.6

space and the levels and block entrances in such a way that the 'hard' materials predominate.

2.15 Width

2.15.1 The Appellant has specified a 3m wide path as a minimum, taking minimum pedestrian-cycle route guidelines (further discussed in the Highway Authority's SoC). This will be the narrowest section of the north-south spine and therefore likely to 'throttle' the capacity, restrict flow and limit the multi-modal functions. A section of a route that is constrained will affect users differently.

2.15.2 The proposed width is far less than other sections of the route:

- Christchurch Footbridge - 3.5-6.75m wide¹⁰ (3.0 - 3.6m as referred to in paragraph 6.4.8 of Appendix 15 to the appellant's SoC).
- Station Road - The street is typically 14m wide¹¹, and the combined pavement width is 7.25m). The west side pavement generally is 4.8-5m (occasionally restricted by bus shelters), and the east side pavement is typically 2.75m (the opposite side of the road from the main desire line along the north-south link - and therefore in addition to the west side pavement).
- The staircase from Station Square (north) down to subway level is 12.5m¹¹ wide at its narrowest point.
- The Station foot tunnel is 4m at its narrowest pointing widening out at the northern entrance.
- The ramp set within the northern station interchange (the north entrance to the Station foot tunnel) is 8.5m¹¹ wide at its narrowest point.
- The pedestrian crossings at the Vastern Road entrance to the northern bus interchange and station square and crossing Vastern Road are 5m¹¹ wide.

2.15.3 The 3m footway and cycleway passing through the site would be the narrowest part of the strategic north-south axis from the Centre to the River's south bank.

¹⁰ The width either side of the mast is 2.5m
¹¹ Measured from 'GoogleEarth',

- 2.15.4 A generous route width - greater than technical minima - is a key indicator of quality. A narrow width combined with a lack of directness and visual links, individually and cumulatively, results in a poor-quality link that will fail to fulfil the strategic significance of this route and detract from the route as a whole.
- 2.15.5 Policy CR11 (iii) requires that developments front onto and provide visual interest to streets and spaces (also in paragraph 5.9 of the RSAF). This is an indicator of quality. The Appellant argues that the Goods Office (Block C) building is needed to comply with CR11 (SoC 3.65 and Appendix 14 para. 6.100). Consequently, the directness and potential visual links along the north-south route are broken. The attached sketch (see Figure 13 and Figure 14) demonstrates that there is no need for this to become an 'either or' situation.
- 2.15.6 Appendix 14 of the Appellant's SoC makes a relevant point in paragraph 5.36 when discussing a different part of the site: *"The immediate existing character of the northern boundary to the towpath, and the neighbouring condition along the same edge to the river, presents a narrow strip of land of between 3-6m in width, generally flanked by retaining walls along the southern edge (see 2.8, 2.14). As such, little opportunity currently exists for landscaping or amenity of any scale along this frontage."* The route as it passes in front of the Goods Office (Block C) has very similar dimensions, with a foot and cycleway of 3m, and total width, including landscaping either side and on-street parking bays to the west, of around 6m. I contend that the concerns expressed at SoC Appendix 14 apply equally to much of the north-south route.

2.16 Visual links

- 2.16.1 At a high level, a direct line of sight between the station square (north) and the River Thames fulfils several purposes:
- It visually connects high-density residential development in the central area and the station area with riverside amenity space. A direct line of sight announces the presence of the river and meadows. The 'walk to the park' will be more attractive, feel simpler, less obstructed, and safer where the destination is clearly visible at the outset.

- Visual ‘breaks’ in the built urban fabric with views out to surrounding greenery and rivers help to relieve or counterbalance the intensity of high-density urban districts: This is the essence of an ‘open grid’ urban morphology.
- Helping to break down the barrier of the IDR and Vastern Road -the incomplete urban inner ring road that acts as a ‘concrete collar’, constraining the development and growth of the central area and severing the centre from the inner suburbs and surrounding open spaces such as Christchurch Meadows. Vastern Road currently reads as the edge of the central area with no visual clue announcing the river and meadows beyond.

2.16.2 Good sightlines are supported by national guidance. MHCLG’s Guidance Notes for Design Codes confirms: *“Good sightlines aid wayfinding”* (paragraph 34).

2.16.3 The policy requires visual links through the Appeal Site (LP para 5.4.6; RSAF para 7.10)¹². I disagree with the Appellant’s twin claims: that policy and guidance require a direct visual link from the station to Christchurch Bridge - and that a more direct visual link than that proposed is impracticable (see Figure 8, Figure 13, Figure 14 and Figure 15).

2.16.4 Puzzlingly, Chapter 7 of the RSAF on Views is not referred to in the Appellant’s Policy Assessment Note (Appendix 12) 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.”

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

2.16.6 LP paragraph 5.4.6 emphasises that visual link overcomes the perception of the area north of the Station as a separate entity.

¹² Local Plan – paragraph 5.4.6; Reading Station Area Framework – paragraph 7.10

2.16.7 As noted above in the policy discussion, the most explicit statement around how these visual links should be provided is in paragraph 7.10 of the RSAF when referring to new views to be created. This states that:

“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.”

2.16.8 Also noted above, Figure 7.2 of the RSAF shows two new views to be created that fulfil this, which are 62 (Station Square looking north) and 63 (new public space on the Thames looking south).

2.16.9 The proposed development fails to deliver the visual link between the Thames and the Station required by policy. The Appellant seeks to justify this mainly in Appendix 14 to the Statement of Case, including Figures 6.1 (referring to visual links from the station) and 6.2 (from Vastern Road). However, as set out above (para. 2.11), this analysis hinges on visual links between the bridge and Station, not the Thames and Station square, which the RSAF requires.

2.16.10 I disagree with the Appellants claim that: *‘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’.*

2.16.11 Even if it were to be accepted that unbroken links between the Station and the Thames cannot be achieved in full, it follows that as much of the route between the Station square and riverside public space should provide a visual link as close to policy compliance as possible with as few shifts in the line of sight as possible. The proposed buildings have been intentionally positioned to terminate sightlines - apparently to increase the number of dwellings with direct waterside views - when the policy directs that the views should be open (see Figure 3).

2.17 Quality of the public realm

2.17.1 A high-quality route is required by policy (LP EN11, CR11g) and should form an important part of the overall public realm (CR3, CR11 v, paras 5.6, 5.9, Figure 5.1).

- 2.17.2 The Appellant has failed to provide a link and overall public realm of sufficient design quality. The quality proposed is not commensurate with the overall strategic significance of the route, with the north-south axis through the centre the most important movement corridor identified in the strategy for central Reading. A simple improvement over current conditions does not deliver the high-quality required by the Local Plan and RSAF.
- 2.17.3 The need for the north-south link through the site to be high-quality is referenced throughout the relevant planning policy. It is referred to, in particular, within the Site allocation, CR11g. The need for public realm in the vicinity of watercourses is also explicitly referenced in policy EN11 (Waterspaces).
- 2.17.4 The definition of quality extends to several design qualities discussed elsewhere in this statement (directness, visual links, width, landscape etc.) which, separately and cumulatively, amount to poor urban design quality overall.

2.18 Cycling

- 2.18.1 The policy specifies that the North-South link through the site should provide an enhanced cycling route and facilities¹³, comply with adopted Highway Authority standards, and not be detrimental to the safety of pedestrians and cyclists¹⁴.
- 2.18.2 I refer to the Highway Authority's SoC on these matters.

2.19 DAS Wayfinding

- 2.19.1 The Appellant's wayfinding strategy is described in the DAS: '*A strong wayfinding strategy is about delivering a combination of design moves and signage, to aid navigation through a space or scheme*' (3.10). '*It is key that this route is clearly defined and provides **easy navigation through the scheme**, connecting to the wider movement network*' (my emphasis). The 'design details' are described so: '*These are elements that take cues from the design of the scheme*¹⁵. For instance, using feature trees along a

¹³ Local Plan – policies TR4, CR11 ii, paragraphs 5.2.1, 5.4.6, Figure 5.1; Reading Station Area Framework – paragraph 11.24, Figure 11.11

¹⁴ Local Plan – policy TR3

¹⁵ Correcting an apparent typo in the DAS, which reads: 'These are elements that make are cues taken from the design of the scheme'.

route; inclusion of details within the paving pattern; and the positioning of buildings to frame and deflect views and movement' (my emphasis).

- 2.19.2 I disagree Wayfinding should be an **important element** to the strategic route as pedestrians and cyclists' journey from the station to Christchurch Bridge (Appendix 12 para. 4.3). I believe Wayfinding can and should only play a secondary and complementary role for the reasons set out above. It is no substitute for a well-designed North-South link, which the Appeal Scheme fails to deliver.
- 2.19.3 Wayfinding measures cannot substitute or adequately compensate for a route that is not easy to navigate in the first place. The proposed position of buildings obstructs views and hinders movement along the link and, contrary to the Appellant's claims, navigation through the scheme will not be 'easy'.
- 2.19.4 The Wayfinding strategy justifies a proposed public artwork at the Vastern Road end of the link that takes inspiration from the central spine on Christchurch Bridge. The shape of the sculpture is designed (DAS p. 107) 'to draw your eye along and into the scheme'. The installation of public artworks is welcome. However, the most appropriate feature that would '*draw your eye along into the scheme*' would, of course, be a clear, unobstructed view towards the riverside - and possibly also the mast of Christchurch Bridge revealed at the earliest opportunity on entering the site from Vastern Road. It is also notable that there is no reciprocal measure to draw your eye into the scheme towards the Station travelling along the link from the north - proposed buildings terminate the view to maximise the number of apartments with river and Meadow views.
- 2.19.5 The Wayfinding strategy measures are to be welcomed in addition to a well-designed route. Still, they are insufficient and no more than a 'sticking plaster' obscuring more basic failings in the scheme design.
- 2.19.6 Concerning wayfinding, I do not agree with the statement: 'Therefore, clear and visually legible wayfinding will be provided as a key element of the proposals, increasing permeability in the area' (Appendix 12 North-South Route Policy Note para 4.3). The statement is based on a confusion of terms and concepts. Wayfinding may assist with

legibility but cannot materially improve **permeability** - a physical, spatial quality of urban environments.

2.20 Accordance with the RSAF

- 2.20.1 Appendix 12 para. 4.12 accepts that RSAF paragraph 5.9 requires a direct pedestrian route from the Station through the Site to the River, as illustrated in figure 5.3 of the Local Plan.
- 2.20.2 The Appellant claims the LPA is applying the RSAF as a detailed blueprint for the area (paragraph 3.34 of the appellant's SoC). I see no evidence the LPA is treating the RSAF as a detailed blueprint or masterplan that must be complied with in a literal sense. However, the RSAF includes very clear priorities and principles for the North-South link that should be fully met - in one way or another.
- 2.20.3 My observation is that the Appellant takes a 'pick and mix' approach to the RSAF principles. They are fully met only where this accords with or involves no major change to the Appellant's programme for the site - particularly the overall residential density; the height and positions of entrances to residential blocks; maximising riverfront views from proposed dwellings; and the access, parking, and servicing arrangements.
- 2.20.4 Appellant's Appendix 12 Para. 3.2. states, *'The proposed pedestrian/cycle route is the product of a considered design evolution process taking account of the context of the Site as well as relevant technical standards'*. I cannot see evidence of that design evolution process in the Design and Access statement (other than showing the previous unacceptable proposals), where I might expect to find it. Paras 3.3 -4 focus on the need to mediate between the bridge level and the site level, the switchback ramp and an - inline ramp alternative.
- 2.20.5 The pedestrian and cycle route appears to have been devised after the housing block footprints, block entrance locations, floor and entrance levels were fixed. This seems to have constrained the further development of the north-south link in response to the LPA's concerns.

2.21 **Summary and conclusions.**

- 2.21.1 The link in the Appeal Scheme is not strategic. It will form a 'weak link' in the strategic route from the town centre to the river and 'throttle' the proper functioning of the route.
- 2.21.2 The features of the proposed link, taken together, indicate that the proposed North-South link is of insufficient design quality.
- 2.21.3 The link is indirect when policy requires that it travels straight through the site. The Appellant has failed, across various studies, to demonstrate what immovable constraints prevent the formation of a direct link.
- 2.21.4 The proposed route is narrow and constrained. The width of the main pedestrian cycle route, typically 3m wide, lacks generosity and is incompatible with the link's strategic role.
- 2.21.5 The configuration of the switchback ramps and incidental spaces is a poor design solution. The configuration of ramps, dwell spaces, and stairs is inadequate, with many conflicts.
- 2.21.6 The route is cranked and tortuous and lacks legibility, with many lines of sight closed by buildings. The points of orientation for pedestrians coincide with moments of potential conflict with manoeuvring motor vehicles and cyclists.
- 2.21.7 The proposed link cannot perform its proper role in the town Centre route hierarchy.
- 2.21.8 The link does not comply with the Local Plan or the Reading Station Area Framework.
- 2.21.9 The design can and should be improved. This requires flexibility on the part of the Appellant and a modest reduction in unit numbers. In my view, this does not require a wholesale revision of the scheme.

3 Height and proximity to the Thames and Thames Path

3.1 Reason for refusal

The combination of the proposed height and proximity of Blocks D & E to the Thames Path will harm the setting and character of the path and The River Thames and thus harm the quality of the public realm in this area to the detriment of the value of this part of the Thames, an identified Major Landscape feature and leisure and tourism destination and therefore is contrary to Policies CR4, CR11v and CR11g and the RSAF, but also policies CC7, CR2, CR3 and EN11.

3.2 Description of height and proximity to the Thames and Thames Path

- 3.2.1 The site's Northern boundary is bounded by the Thames Path and River Thames and overlooks Fry's Island and Christchurch Meadow. Developments along the south side of the Thames frame the southern edge of Christchurch Meadow and mark the threshold of the town centre on the hill.
- 3.2.2 This area is characterised by an open aspect interspersed with mature trees with far-reaching views towards Caversham Ridge. Views extend upstream and downstream along the river towards Reading and Caversham Bridges.
- 3.2.3 The River Thames is c.30 m wide at this point and spanned by a cable-stayed footbridge and cycleway with a span of around 30m.
- 3.2.4 The northern boundary can be characterised as open and therefore particularly sensitive to inappropriate development forms that can easily cause harm.
- 3.2.5 The attached sketch (see Figure 16) gives dimensions for the river frontage. The river frontage of site CR11(g), measured from north-east to north-western corner, extends to 87.56m and 83.03m measured from side-to-side perpendicular to the northern and southern sides ('perpendicular). The appeal site frontage extends to 68.33m (65.37m perpendicular). The SSE site river frontage extends to 19.19m (17.54m perpendicular).

- 3.2.6 The appeal site occupies 78% of the river frontage of CR11g and the SSE site 22%.
- 3.2.7 The built river frontage measured close to the northern boundary (Blocks D and E) is approximately 63% of the river frontage (allowing for the fact the building frontages are not parapedicular to the edge). Considering all buildings facing towards and visible from the river frontage, this rises to 90% (again allowing for some disparity in alignments). The degree of open frontage to the river, the residual, is between 37% and 10%.
- 3.2.8 The Appeal scheme comprises several blocks of development: Block A (The Railway Warehouse); Block B - The Goods Warehouse; Block C - The Goods Office; Block D – The Generator / The Turbine Hall; Block E – Christchurch Wharf; Block F - The Coal Drop Building and the Café.
- 3.2.9 Block D offers a 16.41m frontage, rises to 30.4m, and is set back 10.15m from the river edge. Block D includes a lower rise section (The Generator) that terminates the axial view south across the footbridge. Block E offers a 21.7m river frontage rising to 11.5 - 14.2m and set back 10m from the river edge. The eastern face of F is visible in oblique views from the River and Meadows. Block C lies deeper within the site but frames the view southwards from the River and Meadows.
- 3.2.10 The Appeal proposals are a notably dense and tall form of development.

3.3 Officers report

- 3.3.1 The Council contends that the proposed riverfront buildings (specifically Blocks D & E but also C, The Goods Office, set further back) negatively impact the appearance and character of the riverside in this location. The report suggests that from either direction, passers-by enjoy low-level buildings or buildings set so far back from the path that they do not compete with the character and appearance being dominated by the river.
- 3.3.2 The existing buildings along this stretch of the river are either low level or set back so far from the towpath that they would not compete with the river's character.
- 3.3.3 The report highlights that the number of dwellings proposed results in a closely packed layout with the substantial blocks of apartments provided with barely any setting (para. 6.13).

3.3.4 The report (6.13) acknowledges that for the blocks D and E, next to the Thames, it could be argued that the Thames provides the setting, but this is at the cost of the impact of the tall buildings on the appearance and character of this part of the riverside for the many who come here to walk along either bank.

3.3.5 The report notes that from either direction, passers-by currently enjoy low-level buildings or buildings set so far back from the towpath that they do not compete with the character and appearance being dominated by the river. The report identifies a clear risk that the proposed buildings will harm this character by being too high and too close to the towpath and dominating the view.

3.3.6 The report finds (para. 6.13) that the mitigation measure of setting back the top two storeys will not prevent the harm as will be experienced by pedestrians on the towpath

3.4 **Members' discussion**

3.4.1 Members raised several concerns about the proposed density, height and massing along the riverside and overshadowing effects.

3.4.2 Cllr. Roland raised concerns with the blank frontages at towpath level, particularly beneath the proposed café that was *'not well addressed'*.

3.5 **Environment agency comments**

3.5.1 The LPA SoC concerning RfR 3, ecology, addresses the issue of the setback from the river and ecological matters, including the comments by the Environment Agency (Committee Report 4.18). However, I carry across a central point into this statement of case: the impacts upon ecology, mainly through overshadowing of the marginal habitat, can be mitigated by altering the layout, height, and massing of the proposed riverside buildings and setting them further back from the river edge.

3.6 **Policy**

NPPF

3.6.1 The Council has set out a clear design vision for the river Thames frontage that offers maximum clarity about design expectations, including visual tools. This fully accords with

paras.126 and 128 of the NPPF. The Appellant has been offered as much certainty as possible about what is likely to be acceptable at a very early stage.

3.6.2 Paragraph 130 (c) states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

3.6.3 As first noted in the policy section of RfR 1 above, there are several changes to the NPPF relevant also to Rfr2 (summarised here):

- The social objective of sustainable development has introduced beauty as a requirement (para. 8).
- The National Design Guide and National Model Design Code and area, neighbourhood, and site-specific design guides carry weight.
- Significant weight should be given to development that reflects local design policies - such as the Local Plan and RSAF.
- Developments that fail to reflect local design policies and government guidance on design should be refused (NPPF paragraph 134).
- Paragraph 131 emphasises the importance of trees to the character of an area and the quality of environments.

3.6.4 Part 2 of the National Design Guide sets out ten characteristics of well-designed places. The ten characteristics are based on the objectives for design set out in Chapter 12: Achieving well-designed places of the National Planning Policy Framework:

- Context: Understand and relate well to the site, its local and wider context (C1) and; value heritage, local history and culture (C2).
- Identity: Respond to existing local character and identity (I1): Well-designed, high quality and attractive places and buildings (I2) and: Create character and identity (I3).

- Built form: Compact form of development (B1): Appropriate building types and forms B2 and: Destinations (B3).
- Movement: A connected network of routes for all modes of transport (M1): Active travel (M2) Well-considered parking, servicing, and utilities infrastructure for all users (M3).
- Nature: Provide a network of high quality, green open spaces with a variety of landscapes and activities, including play (N1): N2 Improve and enhance water management: N3 Support rich and varied biodiversity
- Public spaces: P1 Create well-located, high quality and attractive public spaces: P2 Provide well-designed spaces that are safe: P3 Make sure public spaces support social interaction
- Uses: U1 A mix of uses: U2 A mix of home tenures, types and sizes: U3 Socially inclusive.
- Homes and buildings: H1 Healthy, comfortable and safe internal and external environment: H2 Well-related to external amenity and public spaces: H3 Attention to detail: storage, waste, servicing and utilities
- Resources: R1 Follow the energy hierarchy R2 Careful selection of materials and construction techniques R3 Maximise resilience
- Lifespan: L1 Well-managed and maintained: L2 Adaptable to changing needs and evolving technologies: L3 A sense of ownership

Policies CR4

3.6.5 Local Plan policy CR4, Leisure, Culture and Tourism in Central Reading, recognises the River Thames as a prime location for new or improved tourist attractions. Development or improvements are expected to add to or maintain the Thames' setting and character and conserve and enhance the ecological value.

CR11

3.6.6 CR11(v), Station/River Major Opportunity Area states development will provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames.

- 3.6.7 Policy for the allocated Riverside site (CR11g) states 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 (my emphasis). 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.

CC7

- 3.6.8 LP policy CC7, Design and The Public Realm, states that development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The components of development form are listed, including Layout (urban structure and urban grain) and scale (height and massing). Development must follow several urban design objectives, including continuity and enclosure, quality of the public realm, provision of green infrastructure and landscaping, ease of movement and permeability. Developments will also be assessed to ensure that they are visually attractive due to high-quality built forms and spaces.

CR10 The Tall Buildings

- 3.6.9 CR10 is not referenced in RfR 2 because the proposed development height falls below the tall building threshold. The policy is nevertheless a material consideration, mainly because it sets out the approach to height and massing for the Station area as a whole - including the appeal site.
- 3.6.10 There is a clear policy objective to see a stepped reduction in building height from the Central Station Cluster to Thames riverside.
- 3.6.11 The policy defines a tall building as 12 residential storeys or over 36 metres in height. The applicant proposes developing up to 11 residential storeys with a maximum height of 35.1 metres at the front of the site (30.3 m for the riverside block D). The Tall Buildings Policy does not apply. The appeal site lies outside the Station tall building clusters (LP Figure 5.2: Diagrammatic indicative representation of the differing approach to tall buildings in each area). The strategy on tall buildings should not be misread as encouraging or supporting the principle of development just below the tall building thresholds adjoining the three tall building clusters. The fact that a building is below the threshold in no way indicates, prima facie, that the proposed height is appropriate. The

criteria at C10(v) are generally applicable to buildings that are notably tall in the context of their surroundings.

- 3.6.12 The site-specific policy and guidance in the RSAF should also be referred to on height. The benchmark heights given in RSAF Figure 6.9 for plots N1 and N2 (the east and west sides of CR11g) are 4- 6 storeys. Figure 6.10 provides guidance on tall buildings and indicates a lower overall height is suitable because the adjacent housing areas to the site's northwest are recognised as sensitive' to intensification in terms of the established urban character or the need to safeguard residential amenity.

CR2 Design in Central Reading

- 3.6.13 CR2(a) requires continuity and enclosure appropriate relationships between buildings and spaces in Central Reading. CR2(b) requires developers to provide appropriate, well-designed public spaces and other public realms with interest and a sense of place.

CR11(g) Riverside

- 3.6.14 CR11(g) requires development to maintain and enhance public access along and to the Thames. It should be set back at least ten metres from the top of the bank of the river with potential for an area of open space at the riverside.

CR3: Public realm in Central Reading

- 3.6.15 CR3 requires that developers make a positive contribution towards the quality of the public realm.
- 3.6.16 The allocated site CR11(g) Riverside extends to more than one hectare. Criteria at CR3(i) states that **all proposals** (my emphasis) on more than 1-hectare sites within the central Reading boundary will need to provide new public open space or civic squares integrated with surrounding development. CR3(ii) states that new open spaces should be high quality and of a size and shape to be flexible enough to accommodate a range of uses with water features, hard landscaping, trees, and other planting where appropriate.
- 3.6.17 The criterion at CR3(iii) requires explicitly that development proposals adjacent to or near a watercourse will retain and not impede existing continuous public access to and

along the watercourses and provide legible continuous public access to and along the watercourses where this does not currently exist.

- 3.6.18 CR3(iv), developments adjacent to a watercourse, should ‘**enhance the appearance of the watercourses**’ (my emphasis) and provide active elevations facing the watercourses. Development that turns its back on the watercourses and results in blank or mundane elevations facing the watercourses will not be permitted.

EN11: WATERSPACES

- 3.6.19 Reading’s waterspaces are to be protected and enhanced so that they can continue to contribute to (among several points) local character, heritage and visual amenity, the provision of accessible leisure and recreational opportunities and, where appropriate, navigation. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor.

- 3.6.20 EN11 includes a range of criteria on acceptable development near watercourses. The criteria merit setting out in full:

- *‘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.*
- *Make positive contributions to the distinct character, appearance, historic significance, landscape and amenity of the watercourses.*
- *Provide a strengthened role for watercourses as important landscape features, wildlife corridors, historic features and recreation opportunities.*
- *Wherever practical and consistent with its biodiversity role, provide good, level access to and along the waterside for all those who want to use it.*
- *Be set at **least ten metres** back from the watercourse wherever practicable and appropriate to protect its biodiversity significance’.*

Policy EN13

- 3.6.21 LP Housing Policy EN13, although not cited in the RfR, is relevant because it identifies the Thames Valley as one of five ‘Major Landscape Features’ within the Borough. The extent of these features is shown on the Proposals Map and includes the river itself,

Christchurch Meadows, Fry's Island, the Christchurch Bridge, and the footpath on the southern bank of the Thames up to the wall to the current SSE site. The policy states that planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature.

Policy H2

- 3.6.22 LP Housing Policy H2 states that higher density development can be justified when proposals achieve high-quality design and minimises environmental impacts. However, H2 also requires that the appropriate density of residential development is informed by the need to achieve a high-quality design that minimises environmental impacts.

Tall Buildings Strategy

- 3.6.23 Local Plan Paragraph 5.3.36 (the explanatory text to CR10, Tall Buildings) states:

"It is therefore essential that there is a strong and clear policy on tall buildings, based on an analysis of the effects of, and opportunities for, such buildings. A Tall Buildings Strategy was produced in March 2008 and is available on the Council's website."

- 3.6.24 Therefore, the analysis of the effects and opportunities for tall buildings set out in the Tall Buildings Strategy¹⁶ is a material consideration in this appeal and should be read in conjunction with LP CR10. The analysis identifies areas particularly sensitive to tall buildings, including Christchurch Meadows.

3.7 Key issues in dispute

- 3.7.1 The proposals would harm the setting and character of the Thames Path and River Thames and public realm in this area to the detriment of the value of this part of the Thames and its setting.
- 3.7.2 I agree with the statement at 6.8 of the Officer's report. Many of the problems identified with the proposed development could be addressed if some of the buildings were less high and in a different layout, which can be made possible if fewer dwellings are proposed. I also agree that the public realm within the site is poorly designed (para. 6.18) and poorly related to the broader public realm of the riverside and Christchurch

¹⁶ A copy of the Strategy is appended to the LPA Main Statement of Case.

Meadow (para. 6.13). This results from a failure to resolve layout constraints (apparent at an early stage). The resulting scale and massing of the proposals at the riverside and the relationship to the riverside public realm are unsatisfactory.

3.8 **Areas of agreement**

3.8.1 The general architectural quality of proposed buildings addressing the route is high (excluding layout, height, and massing in relation to the riverside and riverside open space).

3.8.2 The development provides 'active frontages' facing the north-south route, the riverside public space (excluding the Thames Path frontage).

3.9 **Detailed Statement of Case**

3.9.1 My detailed statement of Case is set out under the following subheadings.

- Baseline.
- Riverside path.
- Built form.
- Height and mass.
- Gateway.
- The characteristic of the Riverside built form.
- Setbacks.
- North-South link and riverside open space.
- Townscape and visual Impact.

3.10 **Baseline**

3.10.1 There is no dispute that the principle of redevelopment is desirable and will bring benefits. Such benefits should be measured against the position today. I take issue with Mr Taylor's generalisation (6.69-70) that the quality of the existing public realm is 'poor' and 'to a certain extent non-existent'. The area possesses qualities that the proposed development will erase. For example, the view of the Christchurch Bridge mast from the

station concourse, though partly occluded, is nevertheless impressive and an unmistakable landmark, gateway, and legibility marker. The view of Christchurch Bridge set against a distant city skyline and the sky in views from across Christchurch Meadow is also impressive.

- 3.10.2 Mr Taylor (5.14) considers the local character of the site, and its surroundings are ‘varied and lacking in a coherent structure’ (see 2.13). He claims they are ‘currently undergoing significant change through the applications coming forward’ (see 2.19). This ignores the fact that no change is proposed to the north-east or west of the site. The SSE site (the Appellant maintains) is very unlikely to change in the foreseeable future.
- 3.10.3 Except for the allocated site, no significant change is planned along the riverside or to the setting of Christchurch Bridge and Christchurch Meadow. All these areas lie outwith the RSAF boundary. Therefore, the riverside setting will remain essentially unchanged, and it is vital that the proposed development fits within and enhances the established riverside setting.
- 3.10.4 I agree that the scale of change planned and in progress to the south of the site is significant, driven by the new rail station and interchanges. However, contrary to Mr Taylor’s claim that the general development context is one of considerable change, I observe that the riverside context (particularly the northern half of the Appeal Site) demands a sensitive approach to the existing setting.
- 3.10.5 I take issue with several conclusions laid out in SoC Appendix 16 (Townscape and Visual Statement of Case – prepared by Mr Patrick Clark). I dispute the claim that the Appeal Site is a ‘utilitarian void’ in the townscape detracting from the sense of place in the vicinity, including the riverside (para 3.1). The open character and scatter of low-rise buildings contribute to a sense of openness and expansive views across the area that may be harmed or lost through inappropriate development. I also note the site includes a non-designated heritage asset that the Appellant proposes to demolish.
- 3.10.6 Mr Clark claims that the proposed development would replace the utilitarian townscape of the Appeal Site with a strong sense of place at the point where at a human, pedestrian level, the evolving town centre meets the Thames. This is an argument that

‘anything will be better than the existing condition’. Policy and guidance set a far higher bar than ‘better than existing’.

3.10.7 Mr Clark notes that there would be beneficial effects on nearly all visual receptor groups in terms of views (which obviously excludes the locally listed building). I dispute his finding in more detail in the section below on the TVIA.

3.11 Riverside path

3.11.1 Local Plan Policy CR3iii requires that development proposals adjacent to a watercourse retain existing continuous public access to and along the watercourse and legible continuous public access where this does not exist. The Appellant maintains the development fully accords with this requirement by providing direct access to the riverside that does not currently exist (Soc 3.124): *‘By virtue of this it is considered that the proposals contribute positively to the character of the River Thames in this location and the appreciation of it.’*

3.11.2 The impact of the development on walkers and cyclists travelling along the southern towpath has been underplayed or ignored in the TVIA. An enclosed canyon effect is created by the layout, height and building setbacks, the configuration of the riverside open space, the embankments, the limited extent of active frontages at towpath level, the oversailing bridge and projecting café terrace, the enclosure of the bridge approach ramps, and stairs and the solidity of the weathering steel screens. The Appellant may point to the fact the views studied were agreed with the LPA in advance, but this does not explain or excuse shortcomings in the scheme design that the LPA members recognised in RfR2.

3.11.3 Contrary to Mr Clark’s claim regarding the theme of leisure and tourism (Policy CR4), the riverside path (part of a National Trail, and the public open space connections across Christchurch Bridge) offers very many opportunities for the public to enjoy and experience the Thames in this location from the southern towpath.

3.11.4 The configuration of the proposed riverside open space, ramps and stairs prioritises the approach to the Christchurch Bridge level. It demotes the significance of the connection to the riverbank and riverside path. A walker approaching the site along the towpath

would struggle to appreciate from the layout, form and legibility of the buildings and spaces that they have arrived at a major north-south link of strategic significance. Wayfinding and signage might compensate to some extent, but not entirely.

3.12 **Built form**

- 3.12.1 The height, massing, and footprints of the riverside buildings, whilst architecturally interesting, are poorly related to the public spaces and routes to the watercourse.
- 3.12.2 I agree active frontages have been created, but there are critical gaps, such as the dead frontage of Block D at towpath level and the lower level of the café and terrace¹⁷.
- 3.12.3 The Appellant's SoC Appendix 14 Design (para. 4.16) explains that riverside buildings take reference from Victorian riverside power stations such as Bankside and Battersea in London (see Figure 10 and Figure 11). Concerning their riverside setting, I note that in both cases, the height and monumentality of these buildings are counter-balanced by very generous riverside open spaces. In the appeal scheme, the setback and open space are very much less in proportion to the height and monumentality of the proposed riverside buildings.
- 3.12.4 Mr Taylor also believes (5.16) the proposals take cues from the neighbouring Victorian buildings to the west. I assume he is referring to the two-storey terraces. I can see little or no comparison between the industrial and commercial character of the proposals with domestic Victorian terraces such as Lynmouth Road (notwithstanding the discussion at 2.6.4 in the DAS - Terraced Housing Features).
- 3.12.5 I have already addressed in the section above the points raised at SoC 3.113 and Mr Clark's comments (App 16 para 6.18) regarding the built form and Mr Clark's claim that *'the proposed development would echo the role of substantial built forms in signalling the presence of river crossings typical in Reading'*. Mr Clark regards this as *'particularly important given the visionary new route set out in policy aspirations'*.

¹⁷ This conflicts with LP CR3 (iv) requiring that there are no blank watercourse frontages.

3.13 Height and mass

- 3.13.1 The scale and bulk of the riverside buildings depart from the established relationship between buildings, spaces and routes and the watercourse. There are also shortcomings in the scale of the proposed public realm in relation to building height and mass.
- 3.13.2 Mr Clark notes the RSAF benchmark heights of 4 and 6 storeys for the allocated site (RSAF figure 6.9) with no 'landmark' buildings envisaged but then relies on the caveat that '*benchmark heights are not absolute*' to suggest that the RSAF benchmark heights can be easily doubled up. Extending such flexibility across the RSAF area would erode the carefully graduated approach to heights set out in the RSAF and updated at LP CR10.
- 3.13.3 I agree that none of the proposed buildings is a 'tall building' defined by RBC's tall buildings policy CR10. Mr Clark notes that several taller buildings are present in the town centre, and several others are under construction or planned (para. 3.1). I simply note that the Appeal site is outside the three tall building clusters at LP policy CR10. The policy is not an invitation to build up to a height just below the tall building thresholds in surrounding areas in contradiction of the clear RSAF guidance on heights.
- 3.13.4 The Reading Tall Buildings Strategy (para 4.8 and figure 4.6- the full document is appended to the main LPA SoC) emphasises that no tall buildings can be developed on areas of protected open space. Consideration should be given on a case-by-case basis of the potential impact of tall buildings upon the existing open spaces, including Christchurch Meadow. The Meadow can therefore be characterised as particularly sensitive to tall buildings. In my view, this sensitivity extends to buildings just below the tall building height thresholds but still relatively tall compared with existing building heights framing the southern edge of the Meadow and Thames Riverside.
- 3.13.5 Mr Clark notes (para. 7.22) that the proposed development provides a transition between the taller built forms adjacent to the river further south-east and the scale of the emerging town centre. He considers that officers have not adequately considered this.
- 3.13.6 As noted above, the RSAF provides 'benchmark heights' for indicative buildings footprints (figure 6.9 and the associated table). Footprints N1 and N2 (the allocated site)

are listed as 4 and 6 storeys. Mr Clark highlights (SoC 3.118) that *'benchmark heights are not absolute limits and may be modified upwards in certain circumstances'*. Those are, of course, exceptional circumstances (RSAF para. 6.26), and the RSAF anticipates no landmark buildings (above the benchmark heights) on footprints N1 and N2. The Benchmark heights, the RSAF notes, *'may also be modified downwards where it becomes clear that proposed buildings will harm residential amenity or affect the setting of listed buildings, important views, or open spaces'* (RSAF para. 6.24).

3.13.7 The allocated site is indicated at RSAF Figure 6.10 (Tall building location guidance) at the lowest end of the height strategy spectrum and immediately adjacent to areas *'particularly sensitive to tall buildings'* (including the river). RSAF para. 6.2 stresses how important it is to ensure that new development in or near such areas does not harm local amenity or the established urban character.

3.13.8 I assume Mr Clark's argument about the need to transition between higher buildings to the south-east, adjacent to the river and the emerging scale of the town centre, is in reference to Reading Bridge House (RBH), at the south-eastern corner of Reading Bridge. RBH is the tallest building along the southern bank of the river at 11 storeys. However, it lies outside the RSAF area and some 230m from the Appeal Site with lower buildings in between. I, therefore, see no need for the Appeal Scheme to transition from the height of RBH in any way.

3.13.9 The RSAF aims to connect the town centre to the river but not necessarily extend all the characteristics of the inner core (height density, mass) up to the river's edge. The height guidance in the RSAF indicates a transition and gradual reduction in benchmark heights (and densities) from the centre to the edge. Mr Clark compares the proposed building heights with the RSAF landmark building heights, which are the exception, not the rule (as noted above). In my view, the proposed development would create an overly dominant built form that will erode a sense of place and damage the relationship between Christchurch Meadows and the town centre.

3.14 Gateways

3.14.1 Mr Taylor (6.68) explains that the scale of the buildings signifies a gateway into the site and Reading town centre beyond:

'As discussed previously (see 6.68), I consider that the scale of the proposed buildings along the northern boundary is important in order to create a 'gateway' in to Reading, as is the case with Reading Bridge and Reading Bridge House. Of course, Reading Bridge and Christchurch Bridge are different. However, the buildings at that bridge illustrate the principle of marking a gateway, and in addition they are part of the urban context for the appeal proposals.' (6.73).

3.14.2 I agree that this is an appropriate gateway point, following on from the RSAF principles. However, I disagree with Mr Taylor that the principle has been appropriately interpreted and applied in the Appeal Scheme. He is right to note that Reading (and Caversham) Bridge are different from Christchurch Bridge. The context is entirely different. Reading and Caversham are major wide road gateways into the town centre whilst Christchurch Bridge is a narrow pedestrian and cycle footbridge.

3.14.3 Mr Clark argues (6.18) that the proposed development would echo the role of substantial built forms in signalling the presence of river crossings typical in Reading, *'which is particularly important given the visionary new route set out in policy aspirations'*. I simply note in passing that, in the LPA's view, the Appeal Scheme does not come close to the realisation of a 'visionary new route' set out in the policy.

3.14.4 Mr Clark has not systematically analysed built form surrounding river crossings in Reading (including Caversham Bridge and crossings over the Kennet). Based on my fifteen years or more of planning experience in Reading, I disagree that there is a strong link between 'substantial built forms' (which I take him to mean buildings notably taller than their surroundings) and river crossings in Reading.

3.14.5 I note that two tall building clusters at CR10 (LP Figure 5.2) staddle the Kennet within the town centre. Still, no policy or guideline promotes or allows substantial buildings adjacent to the River Thames. As noted above, this is because the Tall Buildings Strategy recognises the sensitivity of the open space setting of Christchurch Meadow and the

Thames. The River Kennet is canalised through the town centre with developments on either side whilst the Thames and its bucolic water meadows skirt the periphery.

3.14.6 Mr Taylor (5.19) claims that legibility is added to the scheme by providing taller buildings at gateway points on the northern and southern edges of the route with smaller scale wayfinding introduced using public art, landscape detailing and directional signage.

From an urban design perspective, he believes that a reduction in height would reduce the extent to which these buildings act as a legibility marker and thereby impact the significance of this entrance to Reading. This is to omit consideration of the Christchurch Bridge itself and its main mast (illuminated at night) that acts as the preeminent legibility marker at the gateway to the town centre.

3.14.7 In my view, the bridge is the gateway and the landmark of greatest significance. The Appeal Scheme's height, mass, open space configuration, and riverside setbacks should complement and not compete with the bridge. Of course, in the argument made elsewhere in my statement, legibility would be substantially improved if the scheme retained views of the bridge as a landmark and gateway from Vastern Road.

3.14.8 The gateway envisaged in the RSAF is a two-way gate framing the bridge. It marks the entrance to the station area and the town centre from the Meadows and the gateway from the station area and town centre into the meadows. The riverside building height and massing are overly dominant in relation to the Meadows and the bridge when viewed from the Meadows. In views from the Appeal Site towards the river, building heights dominate, appear disproportionate with the scale of the proposed riverside open space and impede views of the bridge. I therefore strongly disagree with Mr Taylor's findings (6.58) that the proposals are an appropriate height in the context of key gateways into Reading or an appropriate height in the context of key gateways into Reading.

3.15 **The characteristic of the Riverside built form**

3.15.1 To test whether the proposals maintain or enhance the current condition, Mr Taylor's SoC (6.64) analyses the relationship of the proposed buildings to the river and towpath.

He considers the relationship of the proposed buildings to the edge of the river is within the range of existing buildings and, therefore, acceptable (6.66).

3.15.2 The analysis narrowly focuses on the gaps between buildings when a fuller urban design analysis should focus on the riverside spaces these buildings help define. Figure 18 sets out an analysis of riverside spaces, including the outline of the Appeal Proposals.

3.15.3 In my view, this analysis (Appendix 14 - Appendix A – Relationships to the River Thames) fails to point to any comparable example. I can see no other example of a pair of tall Thameside buildings with wide built frontages and a narrow gap between, so close to the riverbank associated so small a riverside open space?

3.15.4 I note that the tallest buildings are narrow at the river face, present a slim profile to the river or set back, maximising light and openness.

3.15.5 Mr Taylor finds that gaps between the existing buildings are generally limited to existing roads of circa 13m in width, comparing this with the proposed scheme presenting building frontages of 16.5m and 21.5m in width with the landscaped opening on to the River Thames of some 26.1m in width (6.67). He picks and chooses different examples for comparison at para. 6.68. The height, relationship from the River Thames and width of building frontage on to the river of the 'Turbine Hall' (Block D) is comparable to that of Reading Bridge House. 'Christchurch Wharf' (Block E, F and the cafe) is a comparable width to that of the adjacent Lynmouth Court.

3.16 **Setbacks**

3.16.1 Local Plan Policy EN11 requires that development is set back from the riverbank by ten metres. Mr Taylor's SoC (Appendix 14) at 4.18 states the buildings are set back by between 10.0m and 11.9m, this '*key aspect of the design process*' has been achieved, and the proposals are fully consistent with Local Plan Policy EN11 in this regard.

3.16.2 My measurements indicate that Block E is 9.7m from the riverbank at its closest point. Projecting balconies and ground floor terraces are as close as 8.53m from the bank. Block B is 9.66m from the riverbank. The proposed riverside café, projecting terrace (and the podium parking and servicing area beneath) is 8.45m from the river edge.

- 3.16.3 I remain unclear whether the riverbank edge marked on the Appeal drawings comprises the actual bank. The Measures Survey does not cover the towpath, and the OS Plan (which appears to be altered by the Applicant) is unclear. For measurement purposes, The Appellant has taken the southern edge of the bridge approach ramp, which I am not sure is the line of the bank. The setback may therefore be considerably less than the Appellant claims.
- 3.16.4 Notwithstanding, it is a matter of fact (based on my measurements) that the proposed development is closer than 10m from the river edge and exceeds the minimum width in Policy EN11.
- 3.16.5 The LPA asked for the development to be set back at the application stage to comply with EN11. The Appellant did not make changes. The Environment Agency also asked for setbacks of differing lengths. In my view, the setbacks are insufficient, do not comply with the policy, and it should be no surprise that the LPA committee agreed with RfR 2.
- 3.16.6 Mr Taylor's SoC claims, 'in architectural terms', that the site boundary would prevent the 'Turbine Hall' (Block D) being pushed back, and so a set back from the river would result in the form of the building being more tower-like in massing terms. This, he claims, would prevent this building from being expressed in a power station typology and 'result in a loss to the historic former use'. I am not sure what Mr Taylor means by loss of the former historic use, but the only loss of the former historic use I can see results from the demolition of a non-designated heritage asset - 'a power station typology' - at the site entrance.
- 3.16.7 I cannot see how reducing the depth of Block D might result in 'tower-like massing'. The width of the frontage to the river would not alter whilst the width of the eastern flank would be reduced, lowering the impact on the adjacent private riverside open space, and reducing the mass when viewed from the direction of Reading Bridge. In any case, a slimmer 'tower-like' massing would, to my eye, seem to result in a more elegant architectural statement and follow from the tower-like forms of Thameside power stations, including Bankside and Battersea on which the architectural language of the scheme is based (see my Figure 10 and Figure 11).

3.16.8 Mr Taylor's underlying point seems to be that setting Block D further back will result in a loss of units rather than an urban design point about tower-like massing.

3.17 North-South link and riverside open space

3.17.1 RfR 2 emphasises that the **combination** of the proposed height and proximity of Blocks to the Thames Path harms the setting and character of the path and the River Thames and thus harms the quality of the public realm.

3.17.2 I agree with Mr Clark (notes at 6.9) that the proposed development offers the potential to '*celebrate the presence of the Thames waterside in the expanding Reading town centre, where it is otherwise currently perceived as distant*'. However, I believe the Appeal scheme provides an inadequate design response; the Thames waterside will not be sufficiently enhanced, and in some way, it will be harmed; and the link between the town centre, the River and the Meadows will not provide the step-change in the perception of proximity that the Appellant claims.

3.17.3 The riverside open space is a vital link and 'part and parcel' of the North-South link. The concerns set out above in relation to RfR 1 (directness, a direct visual link, width etc.) are directly relevant here.

3.17.4 Local Plan Policy CR3iv concerns the design of developments adjacent to a watercourse, requiring such developments to enhance the appearance of the watercourse and provide active elevations facing the watercourse. Mr Taylor (main SoC 3.125) notes that a purposeful centrepiece of this part of the Site was purposefully introduced; a new single-storey café alongside a projecting terrace overlooking the River Thames. Coupled with the soft and hard landscaped areas between the 'Turbine Hall' (Block D) and 'Christchurch Wharf' (Block E), and the '*generous tapering soft landscaping*' along the river and towpath edge, '*this area is intended to create a new and exciting destination on the southern side of the river for all to enjoy*'.

3.17.5 For the reasons set out in relation to the North-South link above (Rfr1), I strongly disagree with Mr Taylor's finding (6.58) that the proposals offer a sufficient improvement to the quality of the public realm to this part of the River Thames.

3.17.6 Mr Taylor explains (4.18) that buildings deliberately fan out towards the river to address the alignment of the connection on to Christchurch Bridge whilst also producing a more open and inviting approach from the north and widening views to the river and beyond from within the Site. The development fails to provide a direct visual link to the river and so cannot be said to enhance views of the watercourse.

3.17.7 I believe balance here is all wrong. The site entrance from the north cannot be described as particularly open. As noted above, only 37% of the site width is open at the river frontage, narrowing to only 10% at the face of Block D. There is no view through to Vastern Road or further. Relative to the riverside buildings' proposed width, height, and mass, the river frontage cannot be described as open.

3.18 **Townscape and visual Impact**

3.18.1 The submitted TVIA concluded that there would be beneficial effects on townscape character in relation to the townscape adjoining the riverside. However, the final step of the assessment laid out in GLVIA3 has not been undertaken.

3.18.2 Mr Clark (SoC Appendix 16 para 4.16) states the Officer Report did not reference the submitted Townscape and Visual Impact Assessment (TVIA) or provide any commentary that suggested professional advice had been sought regarding the submitted TVIA.

3.18.3 I am not aware of any obligation on the part of the LPA to seek separate or independent professional advice in relation to TVIA (or 'LVIA'). The officer's report is a necessarily selective summary of the most pertinent points. Omitting reference to the TVIA in no way suggests the LPA has not considered the report. The document is readily available on the LPA planning website, and I note that townscape and landscape matters are referenced at numerous points in the officer report (e.g., 4.1.21 and 6.34-36 and 4.25.4), and the CGI's from the TVIA reappear in the DAS, and are referenced in the officer report.

3.18.4 GLVIA III paras 8.35-7 notes that in the case of Environmental Statements, competent authorities will often subject the documents to a formal review of the adequacy of the content and their quality. However, the Appellant sought a screening direction from the Secretary of State, who determined the emerging proposals were not EIA development

(and hence no Environmental Statement was required to be submitted with the application).

3.18.5 I am advised that the LPA carefully reviewed all the applications materials. The LPA officers, qualified and competent town planners, will have applied their professional judgment to the report and its findings and after that have acted in good faith that the TVIA has been prepared by competent persons and practices (as identified in the report); that an appropriate and proportionate method was followed, the impact assessment based upon accurate representations of the site and the scheme (such as CGI's), and the approach to judging the significance of the effects was a balanced one - at least in the judgement of the authors. The LPA noted the findings but respectfully disagreed.

3.18.6 The main Statement of Case points to Appendix 16 (Mr Clark's Statement of Case), which focuses on comparing the existing site conditions and the proposed development- the main purpose of the submitted TVIA. However, Mr Clark and the TVIA have not considered the relative harm or enhancement and overall merits of alternative approaches to the riverside frontage- other than explaining how the Appeal scheme improves upon earlier, unsatisfactory proposals.

3.19 **Summary and overall conclusions.**

3.19.1 There is no other major change planned in the riverside vicinity of the Appeal Site, and development must therefore fit into and not harm the existing setting. The Appeal Scheme does not fit comfortably within the current riverside setting.

3.19.2 The Appeal Scheme will not form an appropriate gateway from the Meadows into the station area and town centre and vice versa.

3.19.3 The riverside and adjacent meadows can be described as particularly sensitive to development taller than existing heights. The scale and bulk of the proposed riverside buildings depart from the established relationship between buildings, spaces and routes and the watercourse in the vicinity. The proposed heights exceed the RSAF guidance and do not reflect the sensitivity of the river setting identified in the Tall Buildings Strategy

(Local Plan para 5.3.6 confirms '*a Tall Buildings Strategy was produced in March 2008 and is available on the Council's website*').

- 3.19.4 The proposed height and massing is insufficiently subordinate to and will harm the setting of Christchurch Bridge and Christchurch Meadow,
- 3.19.5 The TVIA is limited in scope and fails to note or value the baseline conditions.
- 3.19.6 The development is not sufficiently set back from the water's edge.

4 Comprehensiveness.

4.1 Reason for refusal

The proposed development, by virtue of its proposed layout, massing and detailed design, has failed to adequately demonstrate that it is part of a comprehensive approach, i.e. how it would enable the remainder of the sub-area site allocation to come forward in accordance with the policy expectations of CR11g and would not cause unreasonable burdens on its future development, contrary to Policies CR2, CR11viii and CR11g of the Reading Borough Local Plan (2019) and guidance within the adopted Reading Borough Supplementary Planning Document Reading Station Area Framework (2010).

4.2 Description of proposal

4.2.1 The Appeal Site forms a constituent part of three larger policy units: Reading Town Centre, Station/River Major Opportunity Area and the allocated site (CR11g).

4.3 Officers Report

4.3.1 The Officers Report (para. 6.16) raises a concern that designing Blocks D & C to back on to the rest of the SSE site could make it difficult for the remainder of the allocated site to be developed in an acceptable way. The Addendum Report (para. 7.2) states the opinion of officers that this is not to an extent whereby the proposals are recommended for refusal on this basis.

4.3.2 Reference is made to section 3.9 of the Design and Access Statement that indicatively demonstrates how the remaining part of the SSE site could come forward should the opportunity arise in the future. This includes a pedestrian link between the two sites and a combination of interlocking and linear blocks 'to provide generous on-site open space and north-south linkages'.

4.3.3 The Addendum Report finds that: '*Whilst not ideal in some ways (and this would not occur had the sub-area come forward as a single development) it is considered that the applicant has adequately demonstrated that the proposed development would not*

prevent the remainder of the sub-area from fulfilling the CR11 aspirations'. Presumably, this includes CR11g (the Riverside site allocation) and CR11viii (developments to show that they are part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of the policy).

4.4 **Members' discussion and minutes**

4.4.1 RBC members, having considered the Officer's Report, voted to apply RfR 6.

4.4.2 As set out in paragraphs 3.191 and 3.192 of the appellant's SoC, the Committee Report and Update Report, particularly the latter, considered the matter of comprehensiveness and concluded that compliance with CR11 viii had been demonstrated, and it was not recommended to include this as a reason for refusal. The Update Report in paragraph 7.2 does, however, still notes that there are concerns:

*"Further to this, it is clarified that whilst there is concern in this regard, this is not to an extent whereby the proposals are being recommended to be refused on this basis."
(Emphasis added)*

4.4.3 The inclusion of RfR 6 was, therefore, a decision by the Committee. Committee Members' concerns related to the degree to which the subdivision of the site led directly to many of the other concerns and the impact of blank elevations facing onto much of the remaining SSE land.

4.4.4 Councillor Page (addressing the committee as a Ward Councillor) proposed RfR 6. He emphasised the '*critical nature*' and '*strategic significance*' of the site and the need for a '*proper*' and '*effective*' north-south link. He pointed to the wording of LP policy CR11(viii). Cllr. Page disagreed with the officers finding on page 50 of the Update Report. In summary, his points were as follows:

- SSE (the former owner of the entire allocated site) met with LPA officers and Members before the Appellant purchased the site. They (SSE) indicated it was their intention that the entire site would be comprehensively redeveloped. They presented various schemes showing alternative approaches, including retaining and encapsulating electricity transmission equipment below new buildings. There was,

Cllr. Page stated, *'no indication'* of splitting the site and the proposed strategy was for a *'whole site approach'*.

- The proposed scheme did not satisfy *'in any way'* the requirement for comprehensive development *'to the full extent'*.
- He referred to the sole connection between the two parts of the allocated site at an *'alleyway'*.
- He referred to the development *'turning its back'* on the SSE site.
- He stated the developability of the SSE site would be *'compromised'* and *'constrained'*.

4.4.5 Each of the Councillors speaking after Councillor Page echoed and agreed with the comments.

4.5 Policy

NPPF

4.5.1 The definition of sustainable development (para. 8) c) **an environmental objective** includes making effective use of land.

National Design Code

4.5.2 Context (para. 40) requires that well-designed places are integrated into their surroundings, so they relate well to them, are influenced by and influence their context positively.

4.5.3 Development should (C1) *'Understand and relate well to the site, its local and wider context Para 43 Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed and is demonstrably based on an understanding of the existing situation'*.

Local Plan CC9: Securing Infrastructure

4.5.4 Development proposals will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.

4.5.5 LP policy CR11(viii), Station/River Major Opportunity Area, requires that development should demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space.

4.5.6 The explanatory text to CR11 (5.4.2) states, -concerning the development of ‘the wider station area, stretching up to the River Thames in the north and the shopping core in the south, **as a whole**’:

‘These guidelines should ensure that the area continues to develop in a comprehensive manner, and is brought into the core of the centre.’

4.5.7 The explanatory text to CR11 (5.4.10) states:

*‘Ideally, development of sub-areas should be undertaken in **as comprehensive a manner as possible**. Some of the sub-areas are within different ownerships, and it is recognised that parts may be developed with different timescales. However, it is vital that there is clear regard for the rest of the sub-area and that planning applications are accompanied by information that addresses how the development will relate to the potential or planned development of neighbouring sites’.*

4.5.8 LP policy CR2(f), Design in Central Reading, requires development should be designed with consideration of adjacent development sites and should not prevent or cause unreasonable burdens on the future development of those sites.

4.5.9 LP policy CR11g, Riverside, defines the main features of the development that should be provided. Development should:

- Maintain and enhance public access along and to the Thames
- Be set back at least ten meters from the top of the bank of the river.
- Continue the high-quality route, including a green link from the north of the station to the Christchurch Bridge
- Provide an area of open space at the riverside.

4.5.10 LP policy CR3, Public Realm In Central Reading, requires that public realm of the central area will be assessed against a range of criteria, including CR3(i):

‘All proposals on sites of more than 1 hectare within the central Reading boundary will need to provide new public open space or civic squares integrated with surrounding development.’

4.5.11 RfR 6 does not reference LP policy CR3. However, CR3(i) remains a material consideration that the Inspector may choose to take into account. It requires that all proposals on sites of more than 1 hectare within the central Reading boundary provide new public open space or civic squares **integrated with surrounding development** (my emphasis).

Reading Station Area Framework (2010)

4.5.12 The RSAF is a material consideration and emphasises the need for a comprehensive approach to development in order to ensure integrated, high-quality development and public realm.

4.5.13 Paragraph 1.1 identifies the station area as a comprehensive redevelopment opportunity. Para 1.4 recognises the need for a comprehensive approach, and Para 9.9 confirms that comprehensive development is needed to guide development in the near and longer-term.

4.5.14 Para. 13.1 states that: ‘The objective of the Council is, therefore, to secure the comprehensive regeneration of the Station Area in a phased manner **in order to achieve maximum quality of development and public realm**’ (my emphasis).

4.5.15 Para. 13.2 states:

*‘The Council will exercise its planning and transport powers in order to ensure that individual developments are **coordinated and physically integrated** with wider plans to upgrade local transport and infrastructure, including the rail station and new interchanges.’*

4.5.16 The RSAF Principles (para. 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.”*

4.5.17 The aims for the public realm (Chapter 5) include “Stitching’ together the various development sites within the Area both visually and physically”.

4.6 **The main issues in dispute**

4.6.1 It has not been adequately demonstrated that the proposals are part of a comprehensive approach to developing the Policy CR11g site allocation. They do not enable the remainder of the allocation to come forward following policy expectations, including Policy CR11 Station River Major Opportunity Area and Policy CR2 and Central Reading.

4.7 **Detailed Statement of Case**

4.7.1 My detailed statement of case is set out under the following subheadings.

- The appellant has not demonstrated a comprehensive approach.
- Detailed assessment of the Appellant’s comprehensive scheme.
- The proposals do not contribute fully and proportionately towards the policy requirements that benefit the whole area.
- North-south routes.
- Locally listed building.
- Efficient use of the land.
- It is neither impractical nor unreasonable to expect a comprehensive approach.

4.8 **The appellant has not demonstrated a comprehensive approach**

4.8.1 LP policy CR11 criterion (viii) requires that development demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites

from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space.

- 4.8.2 The requirement in CR11(viii) does not oblige the Appellant to fully design out a scheme on the remaining parts of the sub-area. However, the information submitted should be sufficient to demonstrate that a development could be provided that is likely to achieve the requirements of the Local Plan. LP para 5.4.10 considers it '*vital*' that there is clear regard for the rest of the sub-area and that the accompanying information '*addresses how the development will relate to the potential or planned development of neighbouring sites*'.
- 4.8.3 The information submitted is insufficient to demonstrate the required comprehensive approach.
- 4.8.4 The Appellant's main case is that RfR6 is unfounded, and the proposals comply with the policy expectations of Local Plan policies CR11g, CR2, CR11viii, and the aspirations of the RSAF (SoC para. 3.198).
- 4.8.5 The Appellant has sought to demonstrate a comprehensive approach to development at Section 3.9 of the DAS (see Appendix 11.13 of the Appellant's SoC). Section 3.9 constitutes a sketch plan accompanied by four paragraphs of text. The sketch plan shows the approximate locations and extent of the blocks and parking courtyards and indicates potential links and landscaping. It does not indicate the height and massing that could be achieved on any of these blocks (which will be significantly influenced by the Appeal Scheme), nor any estimation of the number of dwellings that might be delivered (assuming that residential development is proposed). Little information on circulation or parking is given.
- 4.8.6 Section 3.9 of the DAS provides insufficient information to positively judge that the development of the rest of the allocation can be satisfactorily achieved in accordance with policy and guidance. This represents a failure to demonstrate that the Appeal Scheme forms part of a comprehensive approach.

- 4.8.7 Mr Taylor provides a more detailed response within his SoC (Appendix 14) at 6.74-6.87 (including Fig. 6.4), which, he claims, 'visually demonstrates a successful indicative site plan for the SSE site, which integrates with the proposed development on the Appeal Site. (para. 3.197). I disagree this is a successful exercise.
- 4.8.8 The DAS claims the 'comprehensive plan' is founded on three principles outlined in the DAS and summarised below:
- The existing SSE equipment provides a constraint to the proposed development, restricting building positions and the provision of windows along the boundary between the two sites.
 - These restrictions allow future development to come forward should this be possible later, as buildings would closely back on to the proposed scheme.
 - The SSE site could connect to the proposed development through the provision of interlocking blocks, creating a pair of courtyards along the middle of the combined site and a pair of linear blocks along the eastern boundary.
- 4.8.9 A single hand-drawn sketch layout is far from a comprehensive plan. There is no further information on the form, height, or layout of the proposed buildings. There are few details on access, circulation and parking and scant information on the functioning of open space. Vehicular access must be obtained solely from Vastern Road with no opportunity for vehicular circulation between sites.
- 4.8.10 Section 3.9 of the DAS rehearses the argument that the existing SSE equipment is not proposed to be removed at any stage soon. This does not alter the fact that the medium- and long-term plan set out in detail in policy and guidance is to secure the comprehensive development of the allocated site as a whole and as part of the planned comprehensive development of the station/river area and the town centre.
- 4.8.11 I agree the SSE site constrains development on the appeal site, but this does not prohibit the full realisation of the objectives for site CR11g as a whole. The Appeal Scheme imposes onerous constraints upon the future development of the SSE site, outlined below (see also my

4.8.12 Figure 17).

4.9 Detailed assessment of the Appellant's comprehensive scheme

4.9.1 I make the following observations on the design quality of the scheme.

4.9.2 I refer to Figure 9 (the Appellant's Comprehensive Plan extracted from Section 3.9 of the DAS) alongside my Figure 17, an adapted version showing the actual ground level layout of the Appeal Scheme.

- The SSE site enjoys no immediate river frontage with development set back much further than the Appeal Scheme. The area nearest to the river has been marshalled to allow a northeastwards aspect down the river for Block D. The full value of the riverside frontage has been 'captured' by the Appeal scheme to the detriment of the future economic development of the SSE site.
- Two of the blocks within the SSE site will need to be single aspect because of the design and layout decisions made by the Appellant. The blocks will need to rise to a height to address the blank walls of the appeal scheme. One of the single-aspect blocks shown on the comprehensive plan has a notably small footprint that will yield a small number of units per floor so that the costs of constructing the core (stairs and lifts) will be disproportionately higher. For comparison, the block immediately adjacent (Block D), within the appeal scheme, contains eight dwellings per floor, whilst the proposed block within the SSE site will accommodate no more than two similarly sized units per floor.
- The appeal scheme includes both on-street and in-structure car parking, partly incorporated within a podium structure masked by landscape mounds (on the river frontage only). The comprehensive scheme for the SSE shows no details of parking. Assuming on-street parking will need to be supplemented by in structure parking, this will need to be at raised ground floor level and will create dead frontages to streets and spaces.
- The proposed open spaces and north-south link immediately adjoin undercroft parking areas creating dead frontages. This will not comply with policy CR11 iii),

which requires that development front onto and provide visual interest to existing and future pedestrian routes and open spaces.

- It is difficult to see how a satisfactory gateway can be formed at the Vastern Road entrance, which will be dominated by the largely blank flank elevation of Block B- one of the tallest proposed.
- A large area is given over to a second north-south link, which will compete with the link within the appeal site that ought to be the main strategic link.
- The proportion of building footprint to open spaces and streets is low.
- The presence of east-facing windows within blocks at the northern and southern ends of the appeal site means that the River Thames frontage and most of the Vastern Road frontage are unable to be developed, which would conflict with policy CR11iii that requires developments to front onto and provide visual interest to pedestrian routes.
- The blocks along the eastern boundary of the site must be narrow and appear likely to be single aspect, given that the width is like the single aspect Goods Office block on the Appeal Site.
- The blank elevations on the appeal site facing the electricity equipment (marked on figure 6.14 of Appendix 14 to the appellant's SoC) mean the SSE site must also be developed with single aspect blocks to a similar height to mask the blank elevation in the Appeal Scheme, as illustrated in the DAS. This leaves canyon-like gaps between the buildings of little utility and inefficient use of space.
- It is unclear how flooding will be addressed.
- The narrow connection between the two sites travels past the refuse area and connects into the appeal scheme at one of the most congested points- a car park entrance
- The gap between buildings C and D means the link cannot function as a vehicular route and allow a more efficient circulation route within and between the two sites using both vehicular accesses.

- The vehicular access to the SSE site will occupy almost the entire frontage to Vastern Road and be framed by the largely blank and massive elevation of Appeal Block B.

4.10 **The proposals do not contribute fully and proportionately towards the policy requirements that benefit the whole area**

4.10.1 LP policy CR11 criterion (viii) requires that development should not prevent neighbouring sites from fulfilling the aspirations of the CR11 policy.

4.10.2 A fully comprehensive approach to the phased development of the two sites will distribute the risk, costs and benefits proportionately. It would not transfer or postpone onerous burdens into later phases whilst reaping a disproportionate share of the benefits (cherry picking') by developing the most valuable development elements - i.e. a disproportionate share of the market housing units. A disproportionate distribution of costs, risks and benefits are likely to make it less likely that the SSE can be economically developed, particularly given that the value can only be realised where the opportunity cost of displacing the electrical equipment has been met (unless it must be removed for some other technical reason).

4.10.3 Shortcomings in the design response to the constraints arising from the subdivision of the sub-area and an apparent reluctance to sacrifice floorspace to secure an adequate response lie at the root of several reasons for refusal. This point is rehearsed in full in the sections on RfR 1 and 2 above.

4.11 **North-south routes**

4.11.1 As I also note above, I agree that the subdivision limits options for the north-south route required by policy CR11 and the RSAF - and the Appellant's SoC emphasizes this point. However, I disagree this prevents a more direct, wider, higher quality route with better visual connections through the site, including east-west connections between the Appeal Site and the SSE site. In my view, significant improvements to the proposed routes can be achieved within the Appeal Site boundary. This can be properly coordinated with a comprehensive development scheme for the whole sub-area to be brought forward in stages that, separately and together, achieve the important policy requirements.

4.11.2 The layout in the DAS contains an additional north-south route through the site, which, although offset from the main strategic route through to the station and not closely linked to the Christchurch Bridge, would appear to take a more direct course through the site. It is puzzling that the Appellant can demonstrate how the smaller and narrower SSE site can provide a direct link when the larger and wider Appeal Site cannot. A secondary route through the allocated site is not required by policy and burdens the SSE site. The formation of two secondary or local routes (The Appeal Scheme north-south link and the SSE site link) will not, together, provide the equivalent of the strategic link policy and guidance requires.

4.12 **Locally listed building**

4.12.1 The lack of a comprehensive approach, stemming from the subdivision of the site, affects the decision not to retain the locally listed building. That is the case from paragraph 6.83 of Appendix 14 to the Appellant's SoC. The Appellant's reasons for discounting retention of the full street scene onto Vastern Road include (a) reduction in development, and increased views of the SSE equipment (b) integration of the existing building within new built form would also lead to a reduction in homes and (c) retention as a standalone structure (d) leading to a reduction in new homes and increased views of the retained SSE equipment. In my view, these issues could be addressed by an alternative comprehensive design approach - and the locally listed building retained. Therefore, the Appeal proposals do not demonstrate that they contribute towards the provision of policy requirements that benefit the whole area.

4.13 **Efficient use of the land**

4.13.1 The illustration shown in section 3.9 of the DAS shows an inefficient use of the remaining land.

4.13.2 National Planning Policy Framework (para. 124) states that planning policies and decisions should support development that efficiently uses land. Paragraph 124 states that policies and decisions should consider (c) *'the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for*

further improvement and the scope to promote sustainable travel modes that limit future car use’.

- 4.13.3 LP policy CR11 criterion (viii) requires that developments contribute towards the provision of policy requirements that benefit the whole area, such as open space. This also links to criterion (f) of policy CR2, where development should not prevent or cause unreasonable burdens on the future development of neighbouring sites.
- 4.13.4 CR11 viii places the onus on the Appellant to demonstrate that they will not prevent the fulfilment of policies on other sites, which must be judged based on the minimal information submitted in the DAS (paragraph 3.9).
- 4.13.5 The total CR11g allocation covers 1.24 ha. The appeal proposals cover 0.76 ha. Therefore, the remaining land retained by SSE is 0.48 ha. The plan shown within section 3.9 of the DAS is indicative only, and it is impossible to make precise measurements, but the building plots shown have been estimated at around 0.13 ha. This estimation was made by plotting these using the Council’s GIS system. This means that buildings would cover around 27% of the site.
- 4.13.6 Plot coverage of 27% would be unusually low for new developments in the centre of Reading. The most recent version of the Housing and Economic Land Availability Assessment (November 2017) drew on recent developments in central Reading to work out an average plot ratio that would be applied to developments in the town centre:
- “Generally, for larger developments which would need to provide their own circulation space, open space etc., a plot ratio of 43% was used to calculate building footprints, which is a reduction from the May 2017 version, again on the basis of more up-to-date evidence. For smaller sites which are already part of a development block, a plot ratio of 66% was used.”*
- 4.13.7 The remaining SSE land would be more comparable with the former type of development, as it would need to provide its own circulation space and amenity areas. Still, the plot ratio shown in the submitted information of approximately 27% would be less than two-thirds of the 43% that would usually be expected on similar sites. Unless the buildings were to be developed at a reasonable height (and no submitted

information informs the decision-maker on height), this is not likely to represent an efficient use of land or achieve the high-density development required by CR11(i).

4.14 **It is neither impractical nor unreasonable to expect a comprehensive approach**

4.14.1 The Appellant has not demonstrated the contrary point - that it is impracticable to facilitate a comprehensive approach. Section 6.97-8 of the main SoC rehearse a series of technical and contractual constraints which, Mr Taylor claims, constrain the development of the Appeal site. Even if these constraints are taken as read, the fact remains that when and if the SSE site will come forward, these constraints will, most likely, disappear completely. The challenge of completing a comprehensive and fully integrated scheme for the entire CR11g site remains. I have set out in the section above why I believe the outline plan in Figure 6.4 provides insufficient detail and is unsatisfactory in the details it does provide. In my view, the Appeal Scheme unreasonably constrains the future development of the SSE. It limits the possibility that the development can be fully integrated into the Appeal Site scheme and vice versa.

4.15 **Summary and conclusions.**

4.15.1 The Appellant has submitted insufficient information to demonstrate that the Appeal scheme will play a full part in the comprehensive development of the CR11(g) Riverside sub-area, CR11 Station/River Major Opportunity Area and the Central area.

4.15.2 The development will limit or prevent the neighbouring site from fulfilling policy aspirations.

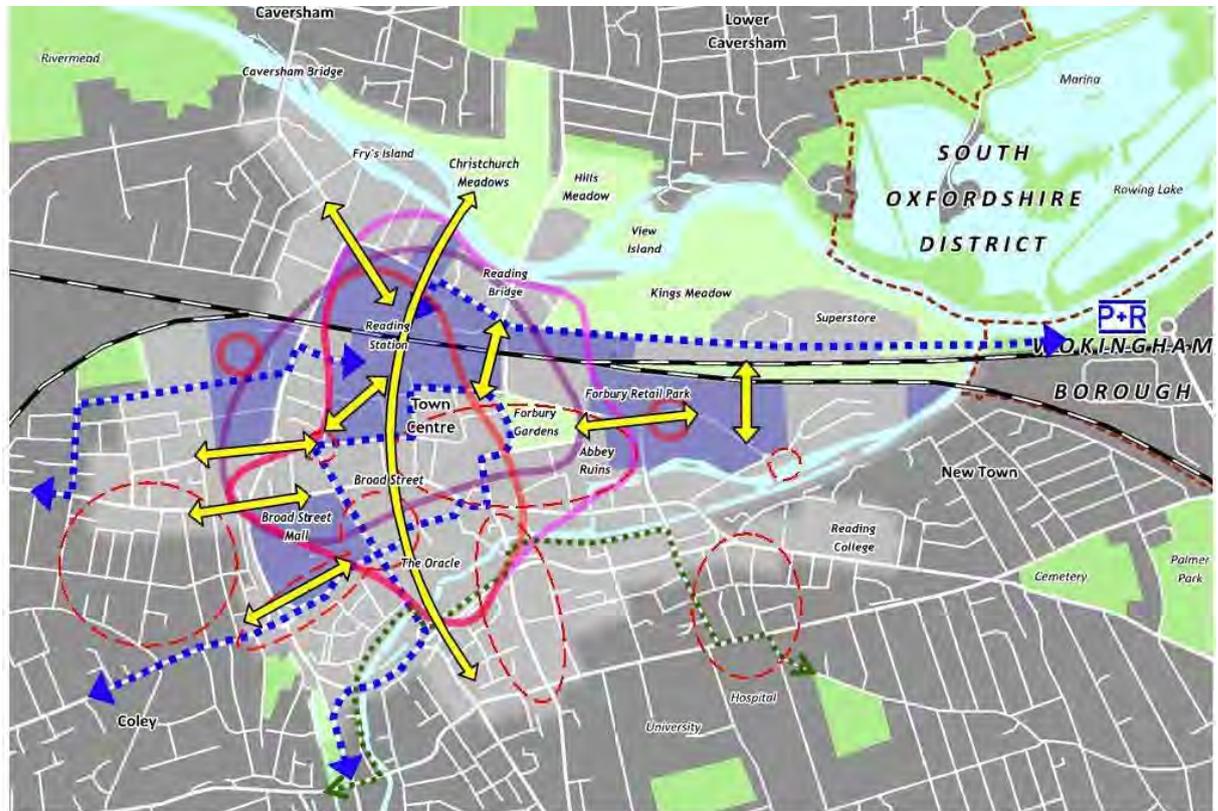
4.15.3 The Appellant has not demonstrated that the development, in conjunction with the rest of its sub-area, will contribute fully towards the comprehensive development of the Station/Riverside area and Central Reading Area and provide a full range of benefits to the whole area proportionate to the potential of the sub-area.

5 Overall Conclusions

- 5.1.1 In my opinion, the proposals fail to relate positively and appropriately to local character and the context of the site to the detriment of the visual amenities of the area and fail to deliver a housing development of the highest quality in relation to its context.
- 5.1.2 It is my opinion that the Appeal should be dismissed.

Appendix 1- Figures

Figure 1 Local Plan Figure 5.1 'Area Strategy for Central Reading showing an improved pedestrian and cycle movement aligned with the north-south spine.



Key

- | | | | | | |
|--|-----------------------------------|--|------------------------------------|--|--|
| | Concentration of retail* | | Potential Mass Rapid Transit route | | Improved pedestrian and cycle movement |
| | Concentration of offices* | | Future park and ride site | | Particular cluster of heritage assets |
| | Concentration of leisure uses* | | National Cycle Network 422 scheme | | Local authority boundary |
| | Opportunity for major development | | | | |

* Location of concentrations are approximate only—please see definitions on Proposals Map

Figure 2 - Figure 7.2 Shorter-distance Views from RCAAP

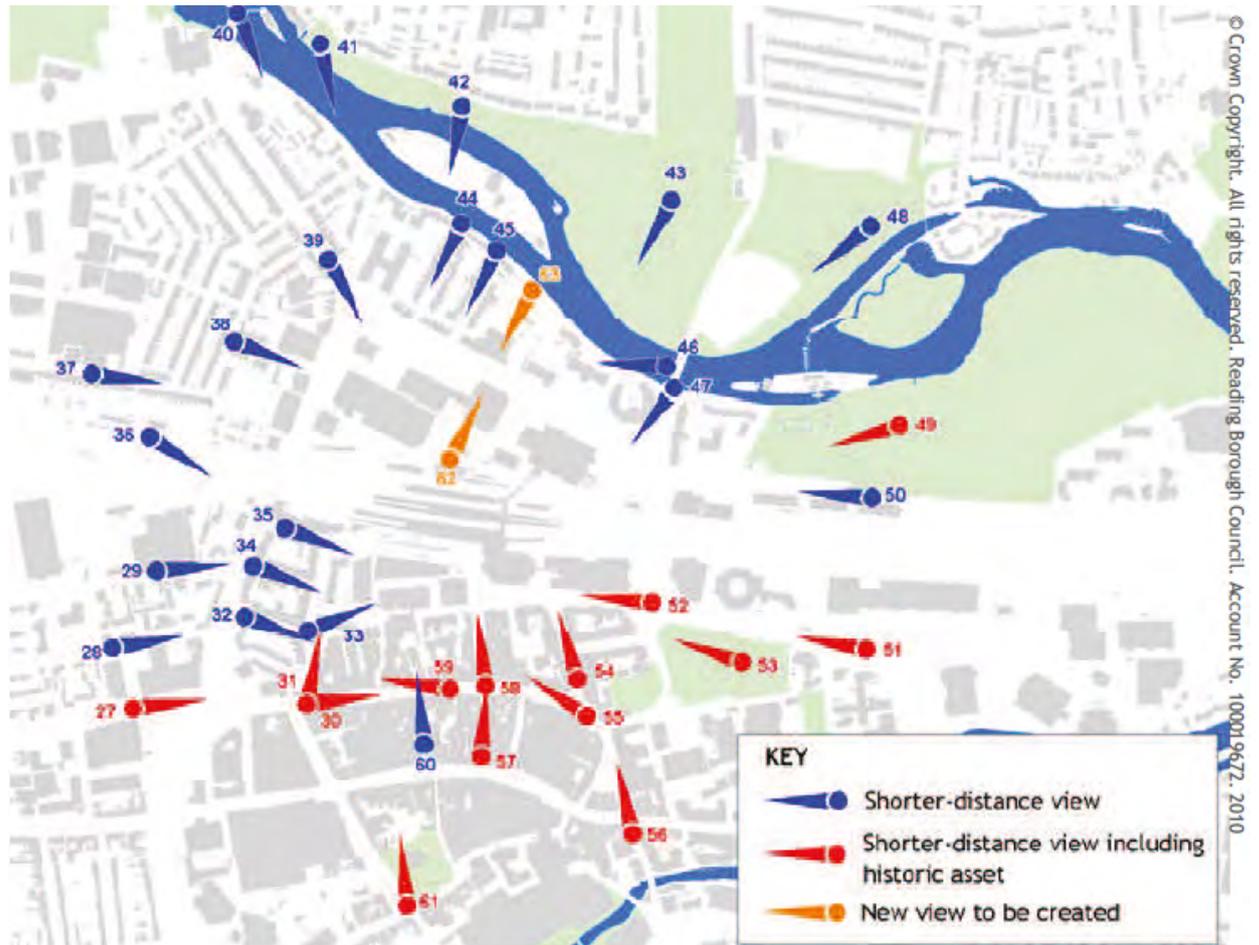


Figure 7.2 Shorter-distance views

Figure 3 - Annotated version of Illustrative Layout showing the pedestrian route through the site

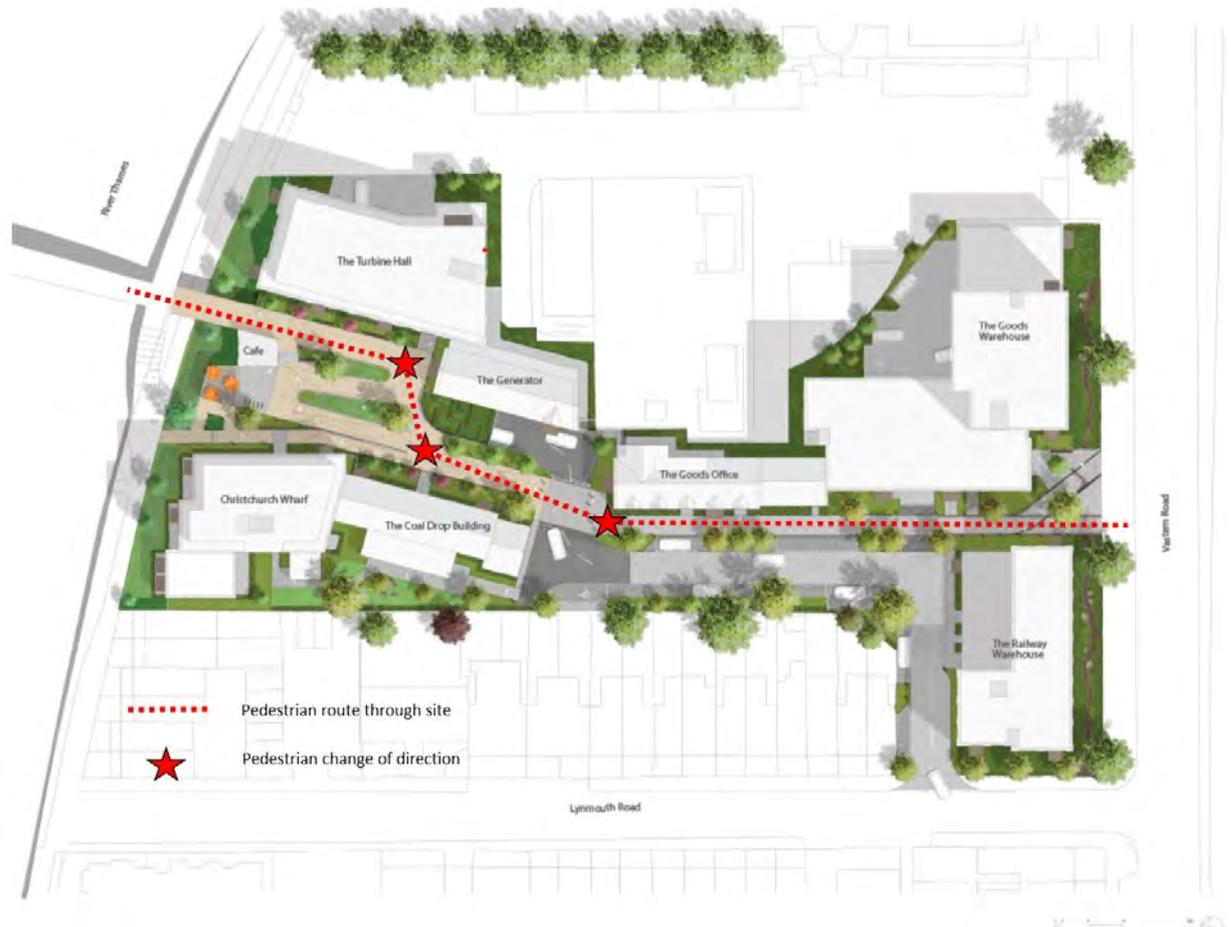


Figure 4 Blank site plan showing the most direct pedestrian route through the site

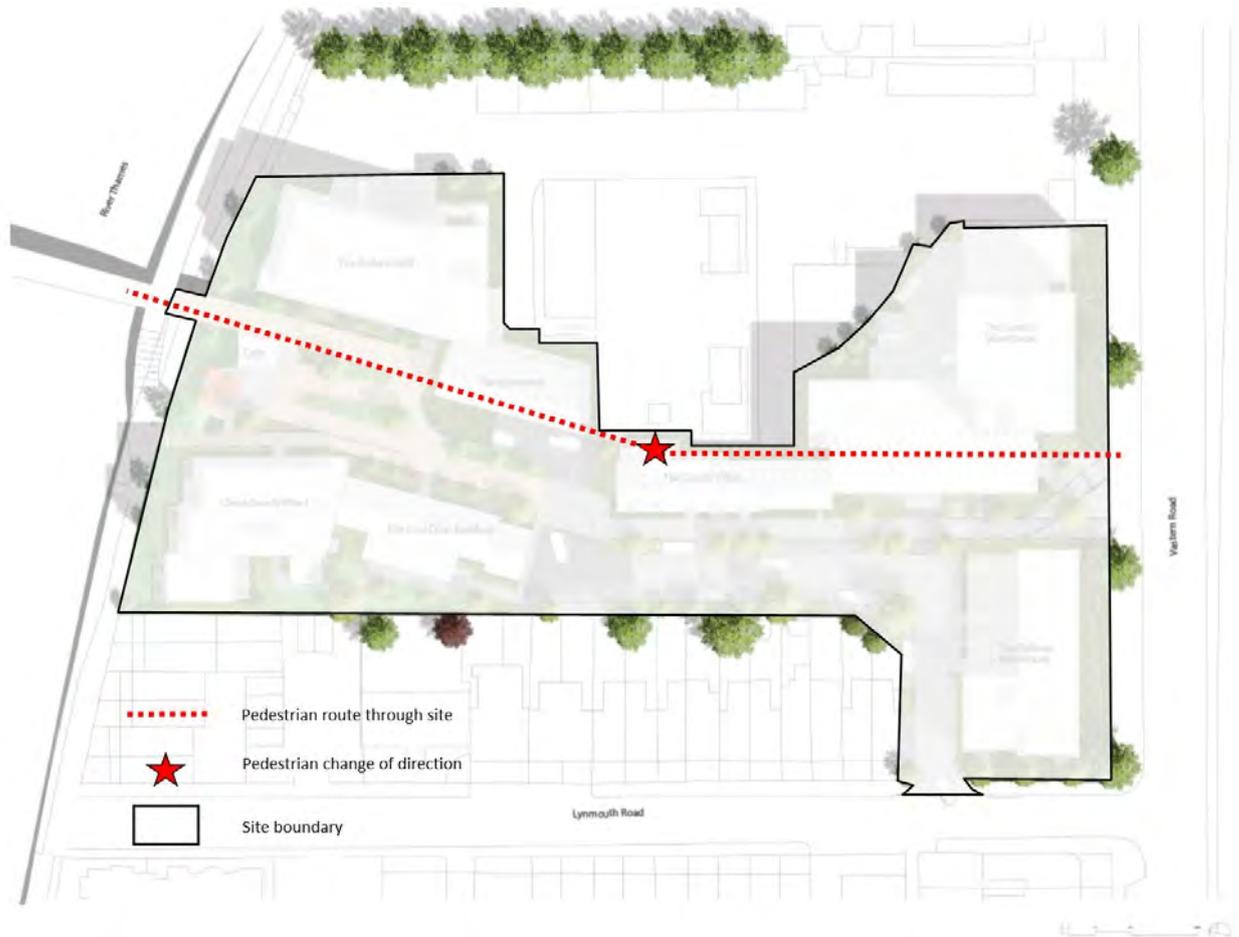


Figure 5- Annotated version of Illustrative Layout showing the pedestrian route through the site with removal of Goods Office and alterations to Goods Warehouse



Figure 6- Appellant's analysis of the directness of potential pedestrian routes

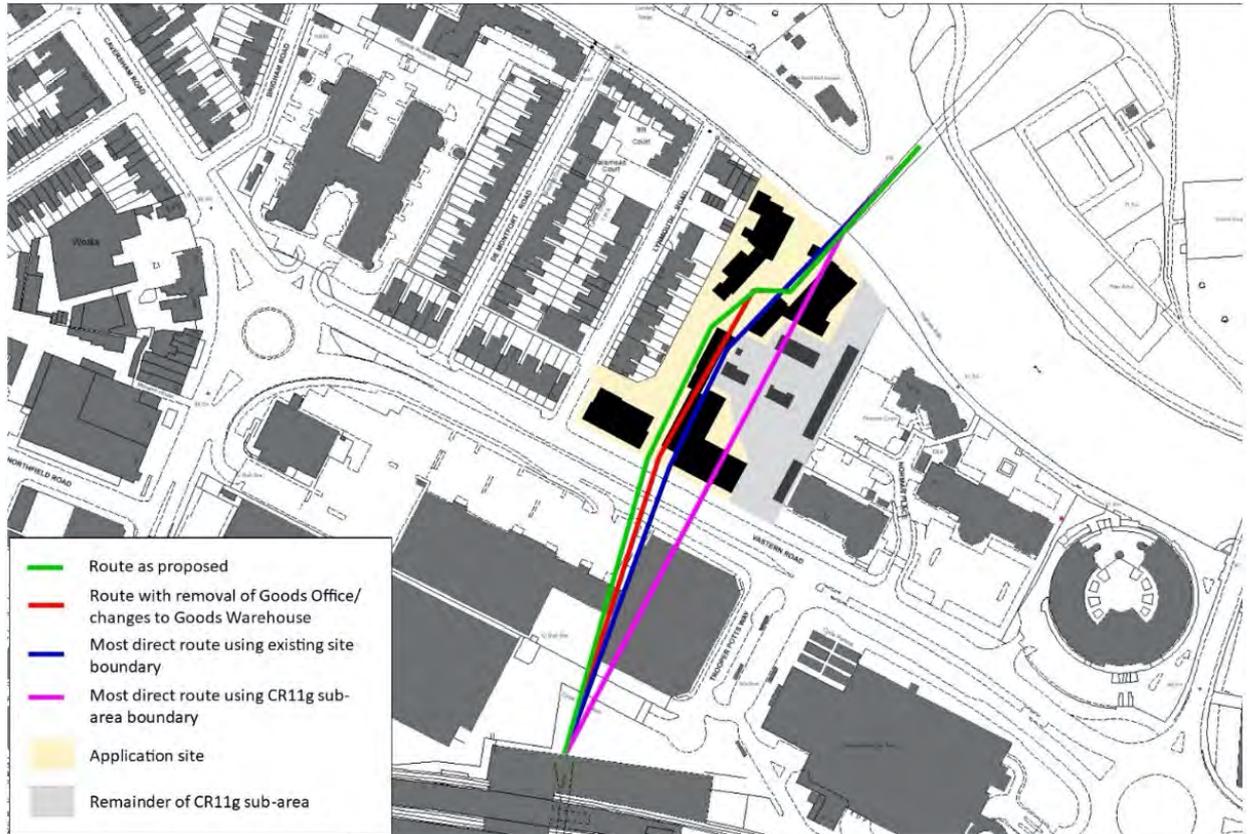


Figure 7 View north within the site (source: Design and Access Statement, p78)



Figure 8 Annotated version of Illustrative Layout showing the visual link to the Thames in the proposal and how it would change with the removal of Block C



Figure 9 Comprehensive Diagram (Appellant's DAS)



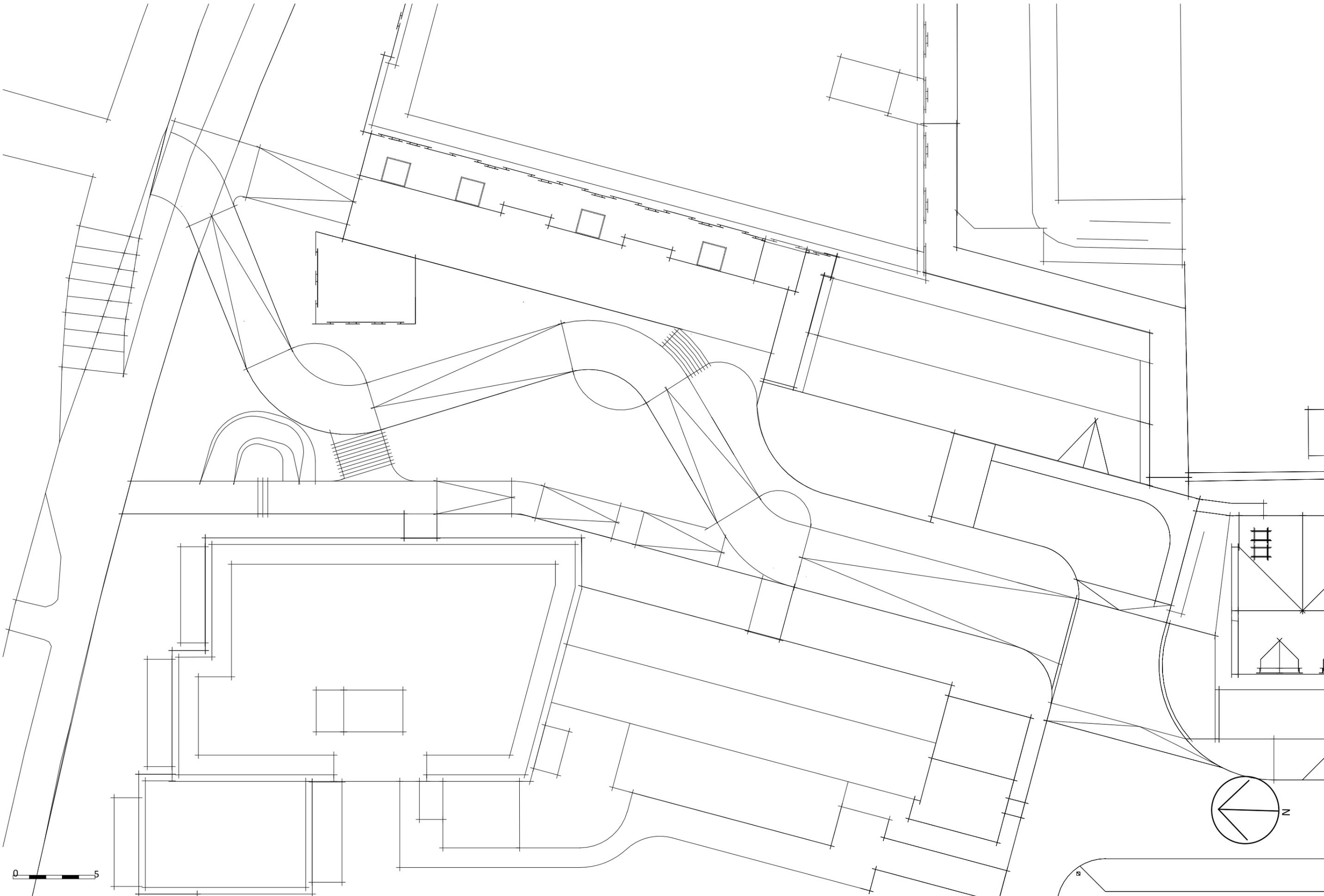


Figure 10 The generous riverside open space at Bankside counterbalances the height and monumentality of the former Bankside Power Station (image credit Prelude Stone).



Figure 11 The Battersea Power Station river frontage includes a large riverside park (image credit Mace).

Figure 12 Sketch Layout showing alternative north-south link ramp configuration
(see A3 foldout overleaf)



PROPERTY
55 VASTERN ROAD

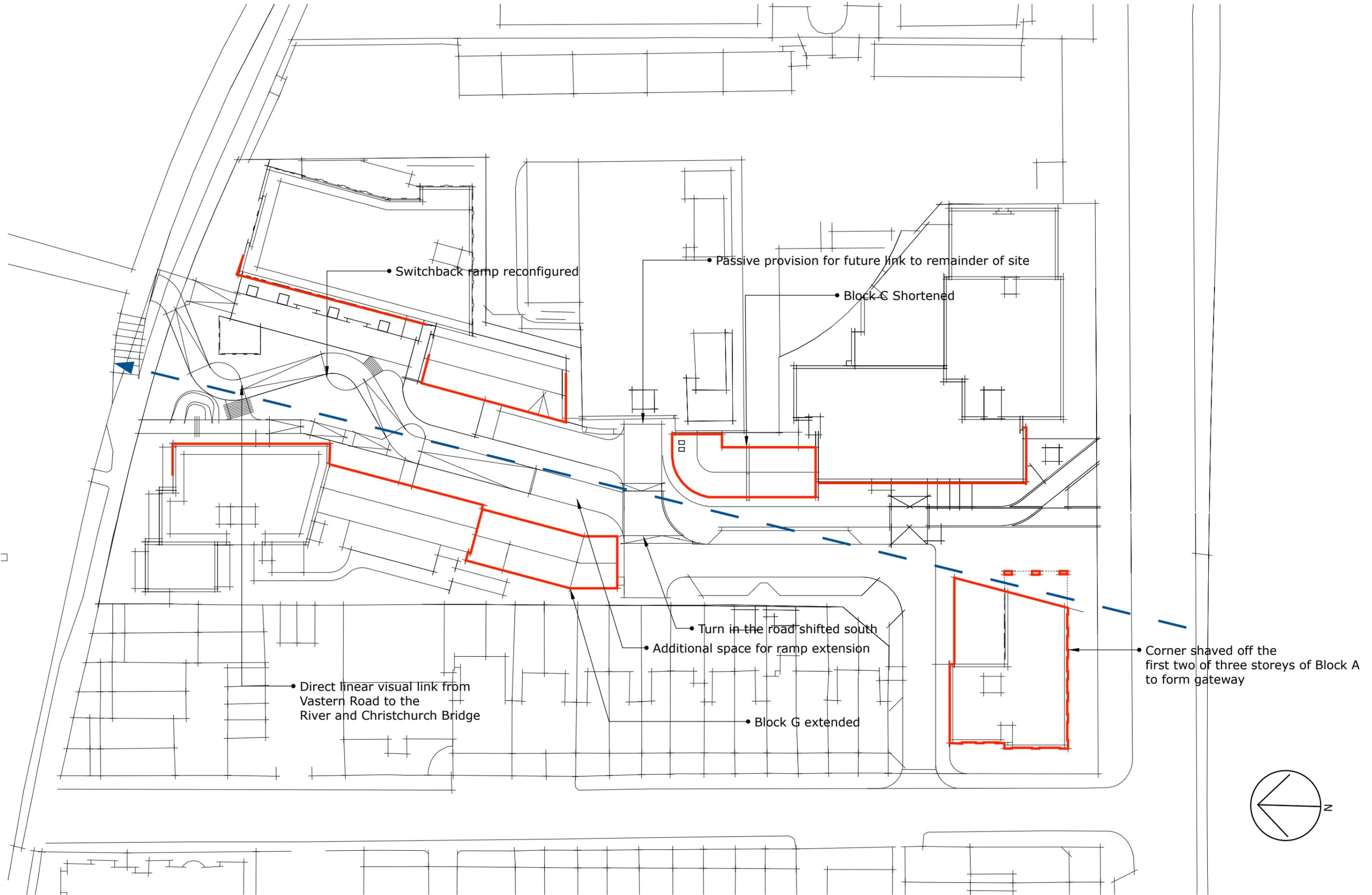
DRAWING TITLE
N-S LINK ALTERNATIVE SKETCH LAYOUT

DRAWING REFERENCE
SK-01

SCALE
1:200A3

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Figure 13 Sketch Layout showing alternative direct visual link (1)
(see A3 foldout overleaf)



PROPERTY
55 VASTERN ROAD

DRAWING TITLE
DIRECT VISUAL LINK 'PROVING
DRAWING' VERSION A

DRAWING REFERENCE
SK-03

SCALE
1:500A3

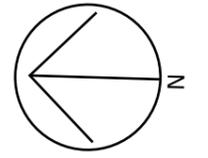
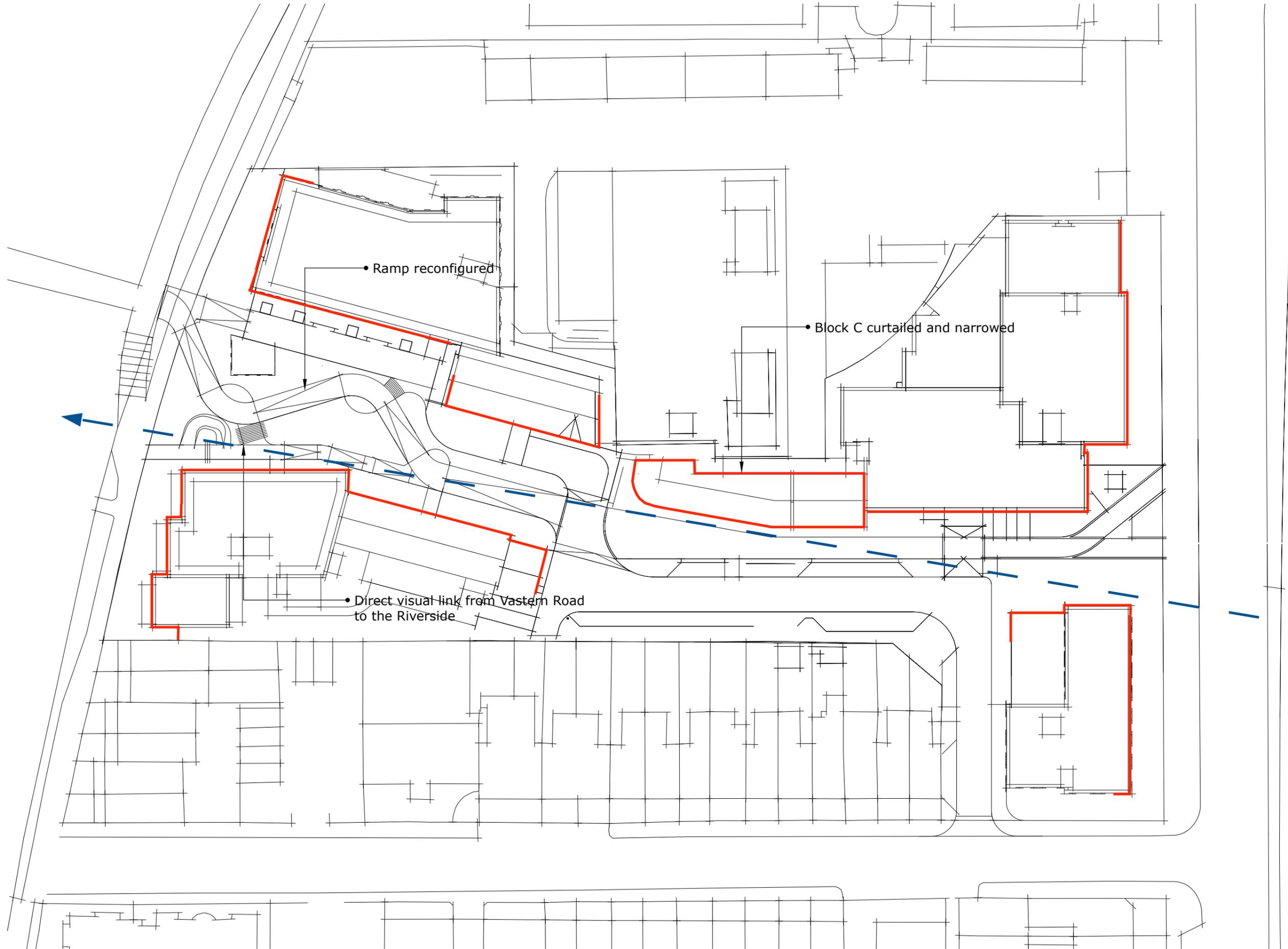


Figure 14 Sketch Layout showing alternative direct visual link (2)
(see A3 foldout overleaf)



PROPERTY
55 VASTERN ROAD

DRAWING TITLE
DIRECT VISUAL LINK 'PROVING
DRAWING' VERSION B

DRAWING REFERENCE
SK-04

SCALE
1:500A3

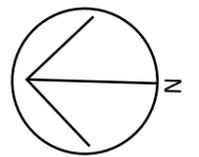
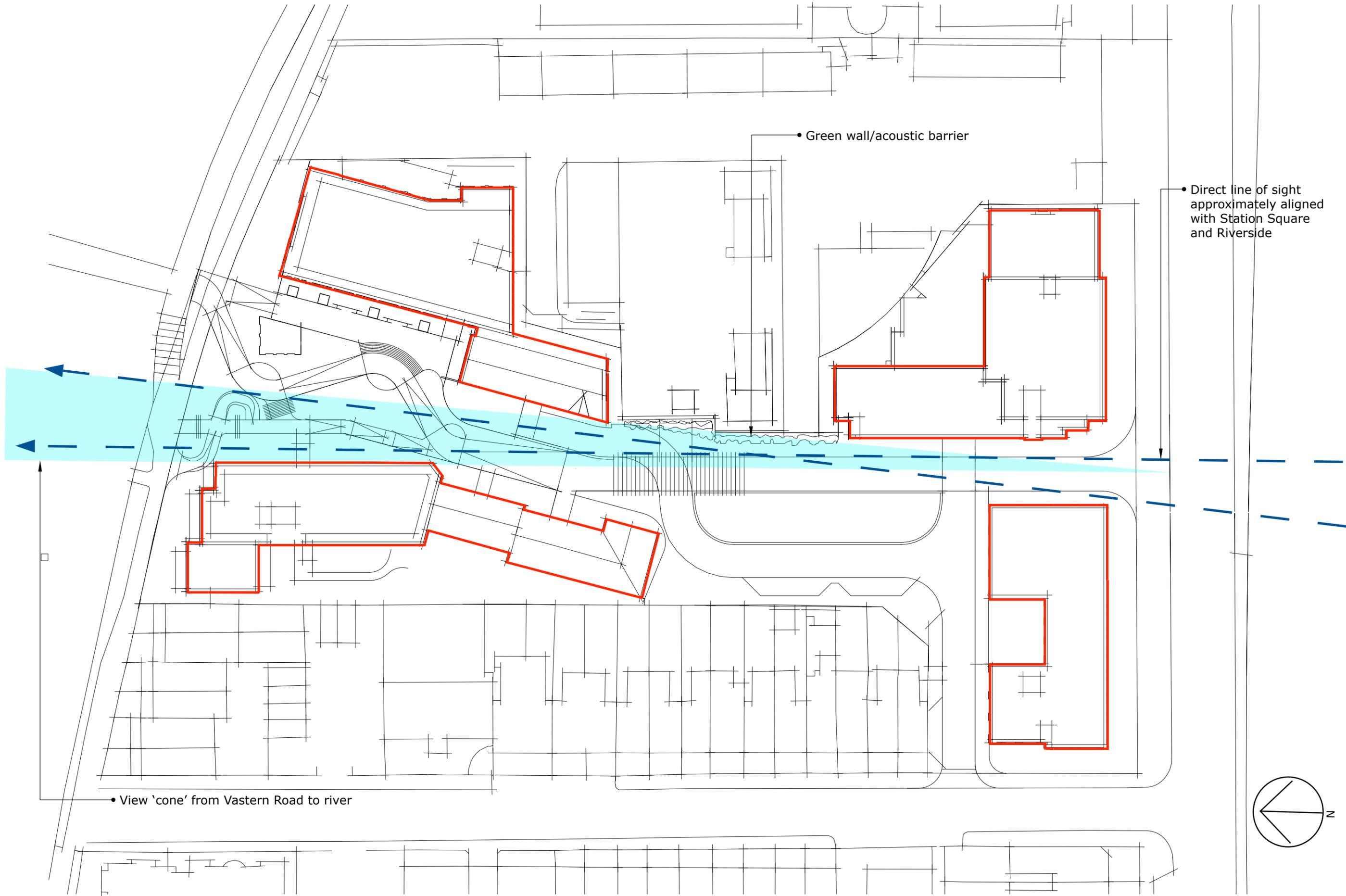


Figure 15 Sketch Layout showing an alternative direct visual link from Station Square to Thames Riverside

(see A3 foldout overleaf)



PROPERTY
55 VASTERN ROAD

DRAWING TITLE
DIRECT VISUAL LINK 'PROVING
DRAWING' VERSION D

DRAWING REFERENCE
SK-07

SCALE
1:500A3

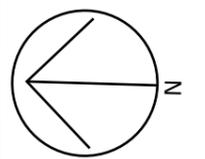
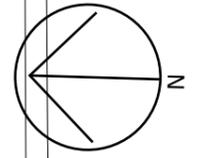
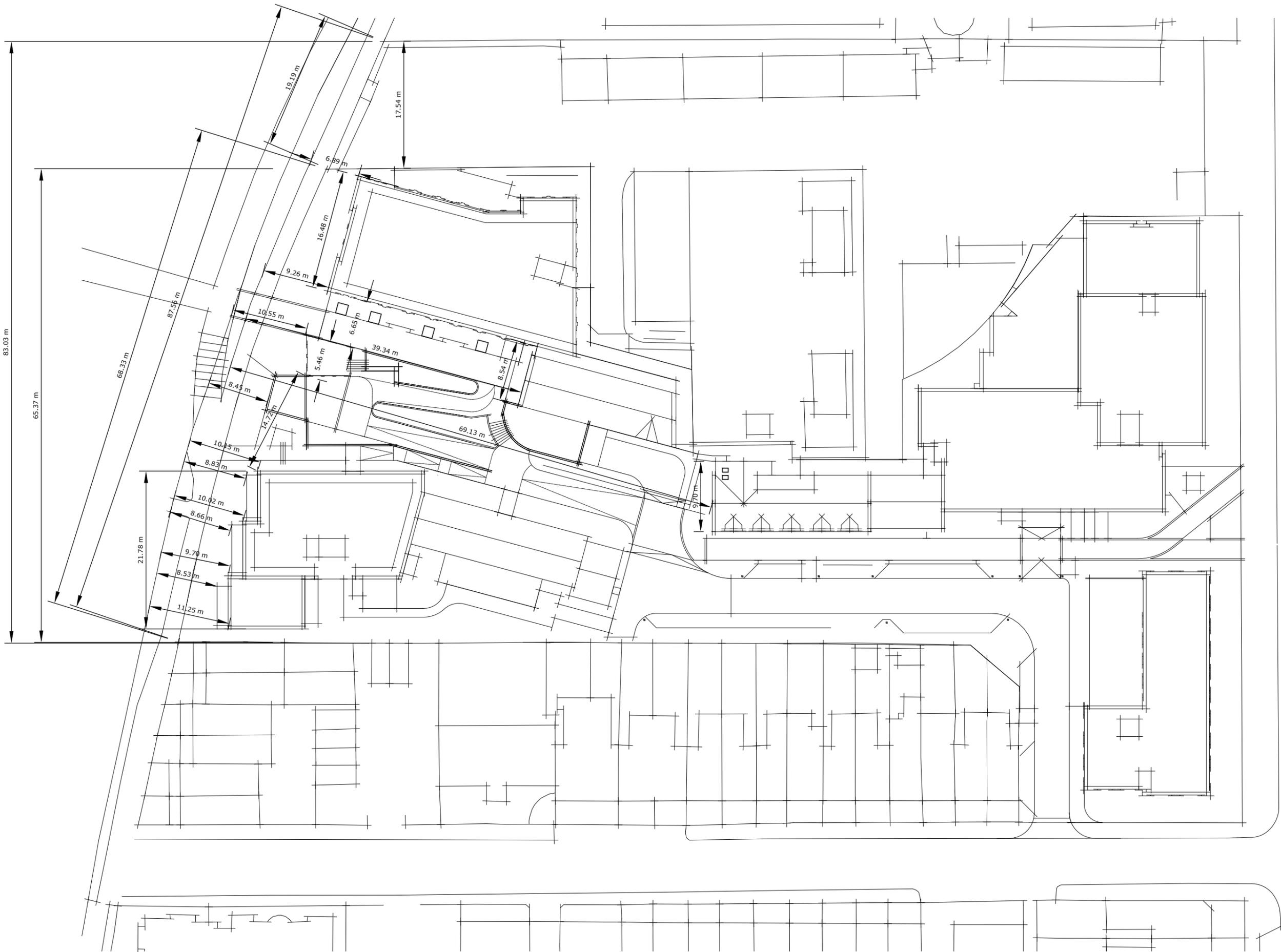


Figure 16 Riverfront dimensions

(see A3 foldout overleaf)



PROPERTY
55 VASTERN ROAD

DRAWING TITLE
RIVERFRONT DIMENSIONS

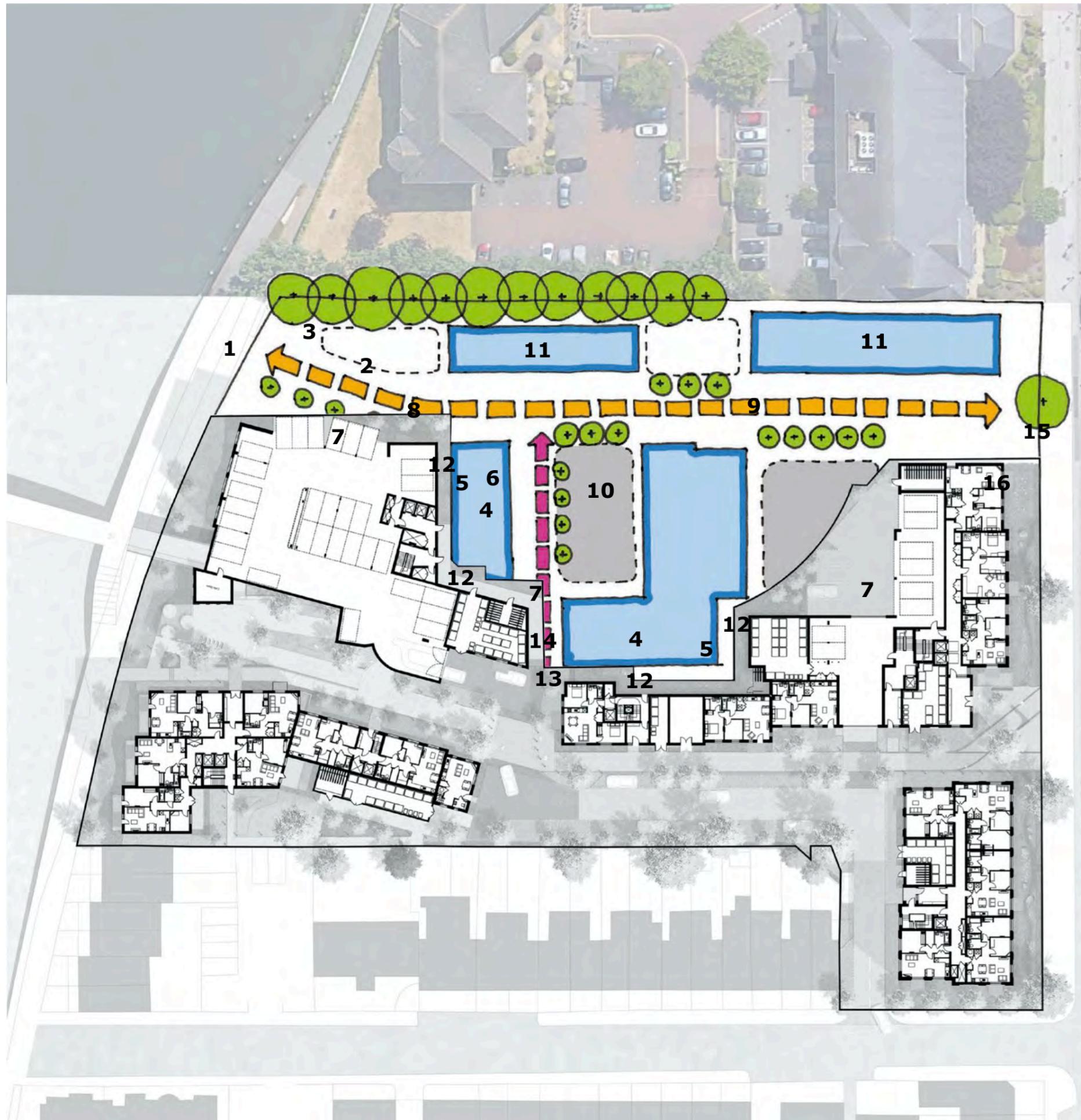
DRAWING REFERENCE
SK-02

SCALE
1:200A3

DATE
JULY 2021

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Figure 17 Analysis of the Appellant's Comprehensive Scheme
(see A3 foldout overleaf)



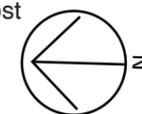
1. The SSE site enjoys no immediate river frontage with development set back much further than the Appeal Scheme.
2. The area nearest to the river has been marshalled to allow a northeastwards aspect down the river for Block D.
3. The full value of the riverside frontage has been 'captured' by the Appeal scheme to the detriment of the future economic development of the SSE site.
4. Two of the blocks within the SSE site will need to be single aspect.
5. Blocks will need to rise to height to address the blank walls of the appeal scheme.
6. One of the single-aspect blocks shown on the comprehensive plan has a notably small footprint that will yield a small number of units per floor so that the costs of constructing cores (stairs and lifts) will be disproportionately higher.
7. Exposed podium/ undercroft structures and surface parking adjacent or across open spaces.
8. The proposed open spaces and north south link immediately adjoin undercroft parking areas creating dead frontages.
9. A large area is given over to a second north-south link.
10. The proportion of building footprint to open spaces and streets is low.
11. The blocks along the eastern boundary of the site must be narrow and appear likely to be single aspect, given that their width is similar to the single aspect Goods Office block on the Appeal site.
12. Canyon-like gaps between the buildings of little utility and an inefficient use of space.
13. The narrow connection between two sites travels past the refuse area and connects into the appeal scheme at one of the most congested points- a car park entrance.
14. The gap between buildings C and D means the link cannot function as a future vehicular/emergency route and allow a more efficient circulation route within and between the two sites using both vehicular accesses.
15. The vehicular access to the SSE will occupy almost the entire frontage to Vastern Road and framed by the largely blank and massive elevation of Appeal Block B. A are will need to be removed.
16. Locally listed building lost

PROPERTY
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DRAWING TITLE
ANALYSIS OF APPELLANT'S
COMPREHENSIVE PLAN

DRAWING REFERENCE
SK-05

SCALE
NTS



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Figure 18 Analysis of riverside public realm
(see A3 foldout overleaf)



Caversham Bridge

Fry's Island

Christchurch Meadow

Christchurch Bridge

Reading Bridge

Vastern Road

Existing indirect link to riverside

Station Square (north)

Rail Station

- Thames House
- Riverside residential
- Brigham Road
- Thames Path (wider section)
- Thames Avenue
- Great Bighams Mead
- De Montford Road
- Appeal Site
- Lynmouth Road
- Norman Place
- Thames Water

PROPERTY
55 VASTERN ROAD

DRAWING TITLE
ANALYSIS OF RIVERSIDE OPEN SPACES
(Image: GoogleEarth)

DRAWING REFERENCE
SK-06

SCALE
NTS



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Figure 19 Extract from City Centre Framework of 2002 (Llewelyn Davies) and Reading Station Area Initial Development Framework (RBC).



Figure 20 Extract from Reading 2020 Study of 1999 (Gibbs)

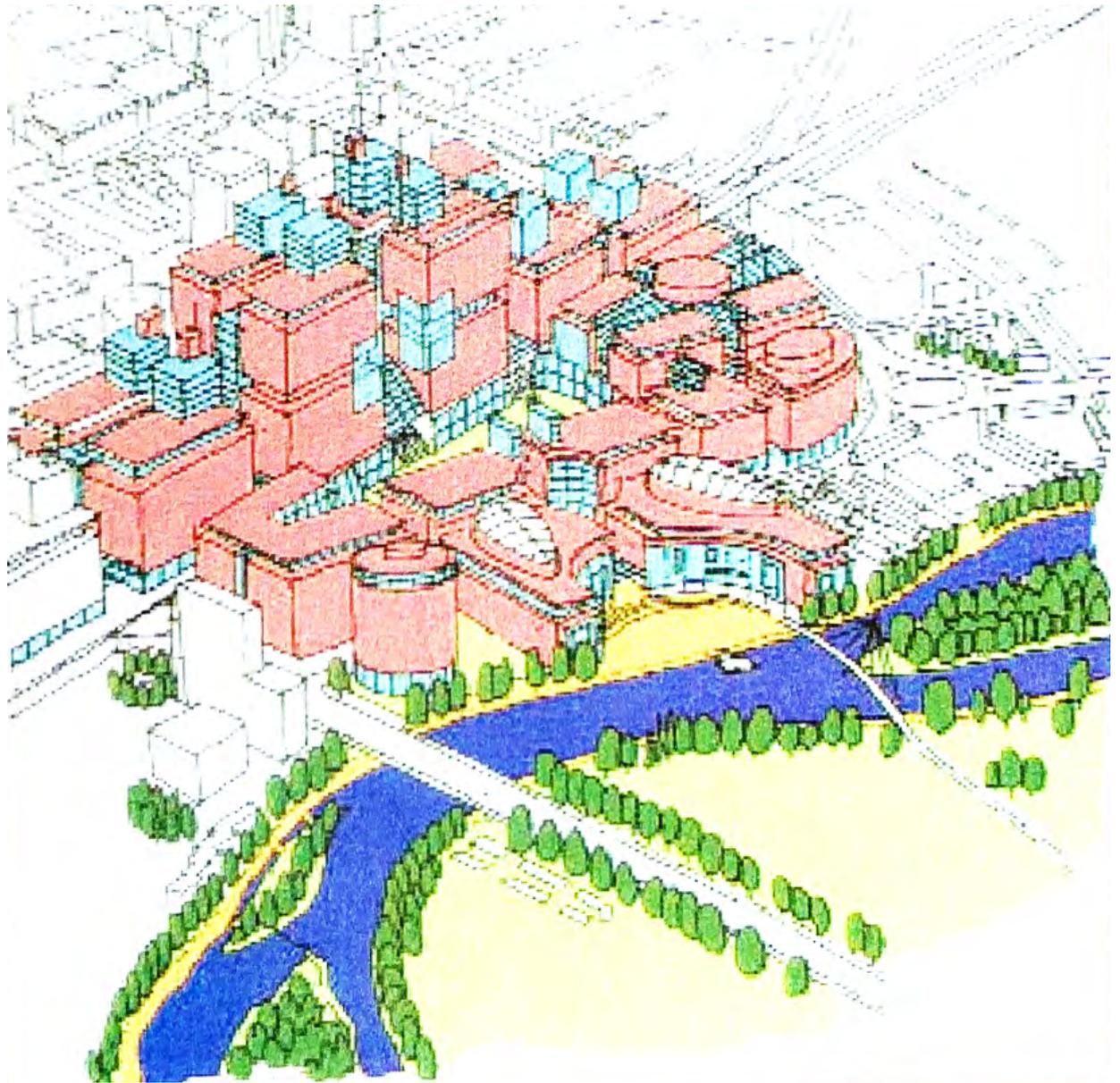


Figure 21 Extract from Reading Station Area Initial Development Framework (RBC) -Figure titled: 'Connecting the City from the Kennet to the Thames'

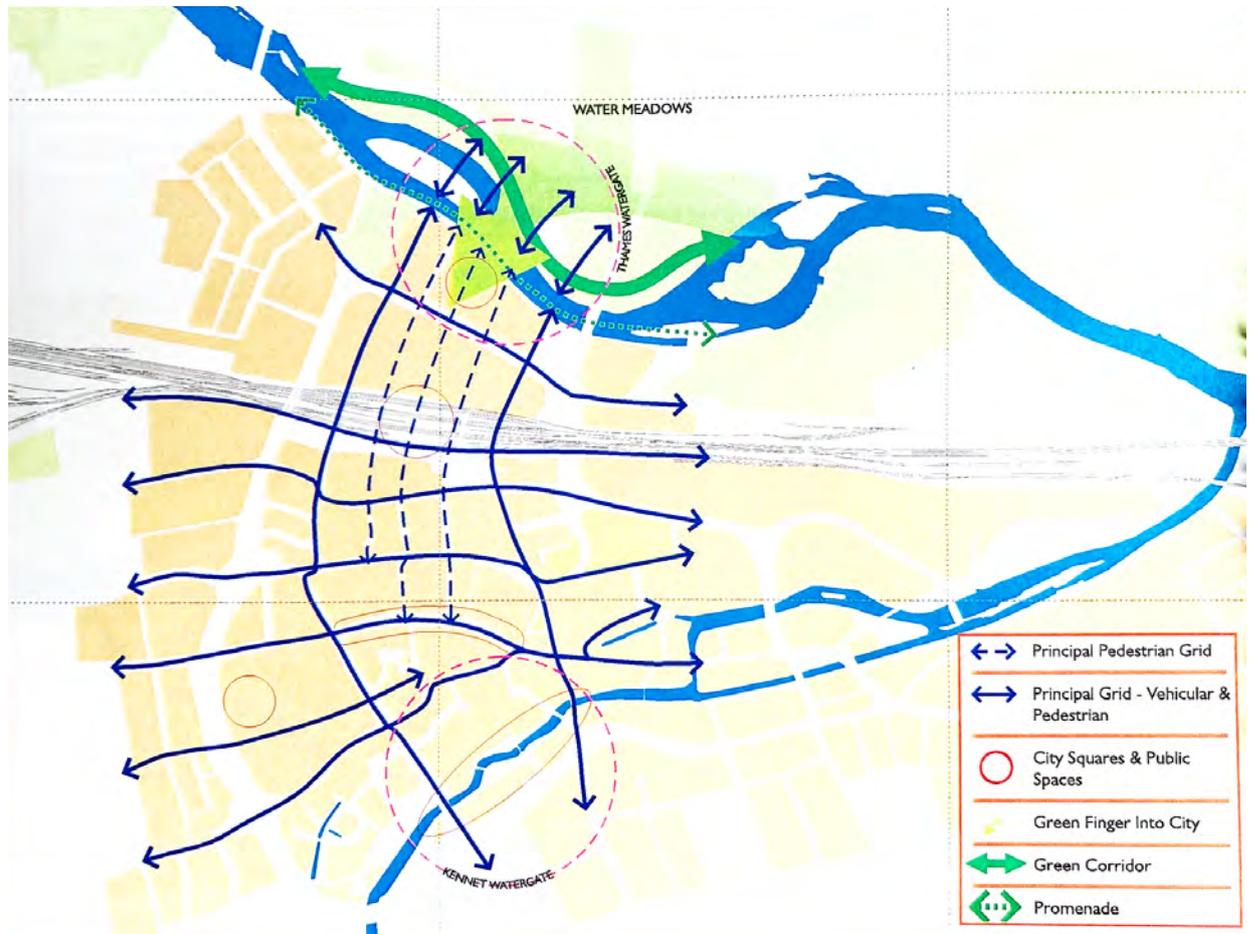


Figure 22 Example of a green link taken from Natural England's Green Infrastructure Guidance (www.naturalengland.org.uk)

