55 Vastern Road, Reading

Proof of Evidence

Design (including comprehensive development)

First Draft Issue 10 9 2021

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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 SUMMARY

1.1 Scope

1.1.1 This Proof addresses the first and fifth Main Considerations identified in the Inspector's CMC Summary Note - (para. 8) relating to design matters:

- *The effect of the proposed development in design terms with particular reference to the quality and effectiveness of the proposed north-south link through the site and the setting and character of the River Thames and the Thames Path;*
- *Whether it has been demonstrated that the proposal would be part of a comprehensive approach to the development of the Riverside sub-area of the Station/River Major Opportunity Area.*

1.1.2 I address the urban design, townscape and placemaking issues relating to this proposal. The evidence 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 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 also consider whether the appeal proposals can contribute to or hinder the comprehensive development of a wider area.

1.1.3 My evidence focuses in detail on four areas.

- North-south link (linking back to RfR 1).
- Riverside (linking back to RfR 2)
- Comprehensiveness (linking back to RfR 6)

1.2 North-south link

1.2.1 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.

1.2.2 The features of the proposed link, taken together, indicate that the proposed North-South link is of insufficient design quality.

1.2.3 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.

1.2.4 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.

1.2.5 The configuration of the switchback ramps and incidental spaces is a poor design solution. The configuration of ramps, including dwell spaces, and stairs, is inadequate, with many conflicts.

1.2.6 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.

1.2.7 The proposed link cannot perform its proper role in the town Centre route hierarchy.

1.2.8 The link does not comply with the Local Plan or the Reading Station Area Framework.

1.2.9 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.

1.3 Riverside

1.3.1 There is no other significant 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.

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

1.3.3 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'*).

1.3.4 The proposed height and masing is insufficiently subordinate to and will harm the setting of Christchurch Bridge and Christchurch Meadow,

1.3.5 The TVIA is limited in scope and fails to note or value the baseline conditions.

1.3.6 The development is not sufficiently set back from the water's edge.

1.4 Comprehensiveness

1.4.1 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.

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

1.4.3 The Appellant has not demonstrated that the development (in conjunction with the rest of the Allocated Site) 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.

1.5 Conclusions

1.5.1 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.

1.5.2 The design quality of the proposed north-south link is insufficient. It will become a 'weak link' in the strategic route from the town centre to the River.

1.5.3 The Appeal Scheme does not fit comfortably within the current riverside setting where no other major change is planned. The setting is particularly sensitive, whilst the proposed height and massing in relation to the riverside is harmful.

1.5.4 The Appellant has submitted insufficient information to demonstrate that the Appeal scheme will play a full part in the comprehensive development of the wider area. The Scheme proposals inhibit the future comprehensive development of the adjoining SSE site.

1.5.5 It is my opinion that the Appeal should be dismissed.

2 INTRODUCTION

2.1 Personal details

2.1.1 This Proof of Evidence 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.

2.1.2 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.

2.1.3 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.

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

2.1.5 A fuller Curriculum Vitae is attached at Appendix B.

2.2 LPA decision

2.2.1 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.

2.3 Scope/main considerations

2.3.1 The LPA Statement of Case (SoC) was structured according to the three design-related Reasons for Refusal (RfR):

- RfR 1 – North-south link.

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. RfR 2 – Height and Proximity to the River Thames and Thames Path.

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. RfR 6 – Comprehensive Development.

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).

2.3.2 The Inspector's Pre-conference Notes suggested matters relating to RfR1 and RfR2 could be considered together.

2.3.3 The Inspector's CMC Summary Note - Main Considerations (para. 8) detailed seven main considerations. The first two relate to design matters:

The effect of the proposed development in design terms with particular reference to the quality and effectiveness of the proposed north-south link through the site and the setting and character of the River Thames and the Thames Path;

Whether it has been demonstrated that the proposal would be part of a comprehensive approach to the development of the Riverside sub-area of the Station/River Major Opportunity Area.

2.3.4 The Case Management Conference (CMC) determined that Design (including comprehensive development) could be taken as a whole.

2.3.5 I 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

2.3.6 I will consider whether the appeal proposals can contribute to or hinder the comprehensive development of a wider area.

2.4 Format of this Proof

2.4.1 A general introduction to relevant policy and guidance on the three grounds is already set out in my SoC and cross-referenced below as necessary (RfR 1 North South Link Section 2.5, RfR 2 Height and Proximity to the Thames 3.6, RfR 6 Comprehensiveness 4.5).

2.4.2 The greater part of my evidence is already set out in my SoC. For clarity, and to assist the Inspector, relevant discussion in the SoC text is exactly reproduced under subheadings below (and cross-referenced back to the SoC sections) followed by further discussion under separate 'Further discussion' subheadings.

Environment agency comments

2.4.3 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.

Policy and guidance

2.4.4 The SoC separately set out and discussed policy and guidance relevant to each of the three grounds. To reduce repetition in this Proof, Appendix A includes a combined discussion of relevant policy and guidance on the general subject of design.

3 NORTH SOUTH LINK

3.1 Introduction

3.1.1 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').

3.1.2 LPA 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).

3.1.3 The Appellant maintains there is no requirement in policy or guidance for a straight link with a direct line of sight through the Appeal Site. They argue the configuration of the Appeal Site boundary prevents this, which I dispute. They maintain there is no satisfactory alternative to the proposed 'switchback' pedestrian and cycle ramp arrangement, and 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. I dispute this.

3.1.4 My evidence is that proposals provide an unsatisfactory public realm and route through the site for pedestrians and cyclists that forms a 'weak link' in the chain extending from the Town Centre through the Rail Station to Christchurch Meadow and Caversham.

3.1.5 A summary description of the characteristics of the proposed north-south link through the Appeal Site is given in my SoC section 2.2.

Format

3.1.6 I briefly refer to policy and guidance of relevance to the north south link in the following sections. A fuller introduction and discussion of relevant policies and guidelines is set out at section 2.5 of my SoC.

3.1.7 The greater part of my evidence on the north south link is already set out in my SoC under several headings. For clarity, and to assist the Inspector, the SoC text is exactly reproduced under each heading below followed by further discussion under a seperate

subheading. In large part, this further discussion directs the reader to the design studies set out in the accompanying figures (Appendix A).

3.2 The strategic importance of the link

3.2.1 My evidence is that the proposed link is insufficiently strategic in scale and ambition.

Statement of case (SoC 2.9)

3.2.2 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.

3.2.3 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). [1, 2]

3.2.4 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).

3.2.5 The Appellant's SoC Appendix 12 (para. 5.9) acknowledges the *'strategically important landscaped link between the station and the river'*.

3.2.6 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 September 2020. I note that section 2.1 (referring to 4.1 of the RSAF) points to a

1 Local Plan CC6, CC7
2 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

'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.

Further Discussion

3.2.7 RSAF Paragraph 5.6 (and Figure 5.1) identifies the Kennet-Thames spine - ***'a major city spine'*** (para 5.9) as one of the public realm priorities. It is 'the most significant movement corridor in the RCAAP', and *'vital to the success of development in this area'*. RSAF 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.

3.2.8 The RSAF recognises the SSE site presents a key strategic planning challenge because it acts as a *major barrier to pedestrian movement'* and *'blocks direct access from the Station to the riverside footpath and cycleway'* (para.2.18). The undoubted difficulty and complexity of this planning challenge is not a satisfactory reason to treat it as a lower priority or to accept a north south route in some diminished form that falls short of the route's strategic importance.

3.3 The purposes of the north-south link

3.3.1 The proposed link will not properly fulfil the purposes for which it has been planned and will act as a 'throttle' on the route.

Statement of case (SoC 2.10)

3.3.2 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'.

3.3.3 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 Figures 27-32). I, therefore, fail to understand why the Appellant adopts the position, and marshals evidence, to demonstrate this is impracticable or unreasonable.

3.3.4 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 spaces[3] reconnecting rivers[4]and a strategic walking and cycling route from the central core through the station to the River Thames)[5].

3.3.5 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.

3.3.6 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.

3.3.7 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.

Further Discussion

3.3.8 As noted above, the Appeal proposals should be judged on whether they fulfil the purposes of the link indicated in policy and guidance. These can be further distilled into several overlapping purposes:

- A strategic pedestrian and cycle route from the Town Centre to Caversham (e.g. LP CR11, LP para. 5.3, RSF 5.6 and figures 5.1 and 5.5).
- Re-connecting the urban fabric and grid of the town centre with the River Thames (e.g. LP para. 5.2.3 and 5.4.3, RSAF figure 8.5).
- A link between Reading's two rivers- the Thames and the Kennet (e.g. CR3iii,).
- A 'green link' through the Station Area (e.g. CR11g, CR11v).

3 RSAF Ch. 3.6
4 RSAF 5.6 and Dig. 5.1
5 Local Plan CR11 and 5.4.3

- A connection to the Thames Path (e.g. CR3iv, CR11g).
- A string of public spaces along the route including a Riverside public space (e.g. LP CR3i, CR11g, CR2b).
- A connection between planned high density residential development in the station area and the open space amenities of the Riverside and meadows (e.g.CR2b, EN10, RSAF para. 3.6).
- A visual link between the Station Square and the River (e.g. CR3iii, RSAF para. 7.10 and figure 7.2).

3.3.9 The Appellant's starting point is that these purposes are, by degree, impracticable or can only be partly met.

3.3.10 The overall success of the spine from the Town Centre to the River is dependent upon each section or link fulfilling multiple purposes and 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 that fully serves all the proposes outlined above - such that this compromises the routes as a whole - and the Appeal Scheme will, therefore, act as a 'throttle'.

3.3.11 I raise a series of further issues with the Appellant's Design Statement of Case (Mr Taylor's Appendix 14).

3.3.12 Mr Taylor (para 6.12) claims only the RSAF refers to a direct route, whilst the LP policies only say it should be high quality. I disagree.

3.3.13 LPCR11(ii) confirms *'North-south links through the area* ***centred*** *on the new station'* are of *'particular importance' (my emphasis)*. I believe it is implicit that the route should as far as possible be radial to the station. In any case, LP Figure 5.3 (my Figure 2), Station/River Major Opportunity Area Strategy removes any doubt on the alignment. This shows a direct alignment and LP para 5.4.9 confirms the diagram indicates some of the elements that need to be taken into account in developing this area.

3.3.14 Mr Taylor's paragraphs 6.14-15 claim it is not possible to provide a direct line of sight and the RSAF also shows a curved route. I cannot see how Mr Clarke has formed this

view. I have demonstrated that a direct line of sight from station to riverside is feasible (Figures 31 and 32) and there are further options involving relatively minor scheme adjustments than can provide a direct line of sight from Vastern Road to the River (Figures 28,29 and 30). RSAF Figure 8.1 Station/River Opportunity Area does show a curved alignment in diagrammatic form. However, this diagram is taken from the preceding RCAAP and is superseded by the Local Plan. The illustrative proposals at page 80 of the RSAF clearly show a direct route whilst Figure 8.2, Framework Structure, also shows a straight route and direct line of sight. The RSAF does not propose a curved route.

3.3.15 Mr. Taylor (para. 6.18) claims a "a single deflection" can be successful in "keeping visual deflection to an absolute minimum". I cannot see that the Appeal Scheme has set minimising deflection as a design priority. This does not appeal in the list of guiding design principles at DAS section 3.1 (page 55) whilst one of the principles set out there clearly militate against a direct route (Urban design principle 11. Use of buildings to deflect vistas and define the public route through the site).

3.3.16 The Appeal scheme includes one major deflection in the station - river direction. However, this overlooks the deflection on the route at Vastern Road and the vertical deflection of the rising ramps and stairs approaching the Riverside. Looking at the route from the opposite direction (see figure 50) the route is characterised by a series of deflection points and pinch points, which clearly follow from the urban design principle 11 in the DAS and which conflict with policy and guidance.

3.3.17 Mr Taylor (para 6.22) claims the Design Addendum demonstrates that the loss of the 'Goods Office' (Block C) will not result in a significant change to the alignment of the route, with a single deflection still being present. This is contradicted by my Figures 28, 29, 30.

3.3.18 Mr Taylor (para. 6.26) claims direct pedestrian access is provided by the switch back ramp arrangement and to remove it would have knock on problems (paras 6.29-32 and 6.37-8). I disagree the switchback arrangement provides direct pedestrian access because this involves two additional changes in direction for pedestrians using the

stairs. I have shown alternatives such as my Figure 27 that shows a serpentine ramp arrangement that more closely follows the natural desire through the Appeal Scheme line to the river that avoids the need for sperate staircase route because pedestrian do not need to switch back and forth along the Appellant's switchback ramp arrangement. My Figure 27 serpentine ramp can be widened further along its whole length.

3.3.19 I raise a series of further issues with The Appellant's Townscape and Visual Statement (Mr Clark's Appendix 16).

3.3.20 Mr Clark (para. 7.6) claims the river itself would not be readily visible from any route across the Appeal Site until reaching the northern part of the Appeal Site whilst the cor-ten steel fencing on the bridge ramps/steps and any rising ramp or steps from within the Appeal Site to meet the elevated southern end of the bridge would also combine to interrupt views towards the river. This is not correct. My Figure 36 shows that it is highly likely (subject to final site levels) the River can be glimpsed from the site entrance on Vastern Road. My Figures 28, 29 and 30 demonstrate three direct lines of sight that arrive at the Riverside immediately to the west of the bottom of the staircase up to Christchurch Bridge. Looking more widely, the surface of the River is not the sole focus of the view it is desirable to frame. This includes the general openness of the river corridor, the mature riverbank trees, and views across to the Meadows.

3.3.21 Mr Clark (para. 7.8) refers to the work of Gordon Cullen, suggesting it is permissible to split the route into a series of recognisable visual statements, cutting up of the linear town system into digestible and coherent amounts whilst retaining a sense of progression. Cullen's book 'The Concise Townscape' is indeed a highly influential urban design text.

3.3.22 The strategy for the station area is to break down the barrier of the railway and IDR, connect the fragmented land parcels on the north side of the railway and extend the broadly rectilinear grid of the town centre towards the Thames - including a direct north south link centred on the station with as direct a line of sight along the route as possible. Cullen's aim was to cut up the linear town system because he considered it relentless and lacking in urban environmental quality. That is the opposite of the challenge facing

the Station River Opportunity Area where it is the tortuousness of the routes through the area that are preventing the northside preforming its full role in the development of the town and in connecting the town centre to the river.

3.3.23 Mr Clark (para 7.10) gives several examples such as the Thames path in London which contains public realm corridors which do not rely on long forward visibility but are successful. I note that the Thames path through Bankside travels along the riverside and was developed in stages and threaded through the existing urban fabric. The route along the Thames was planned in part to compensate for the fact that access to the Thames from south London was highly restricted. The route is often tortuous route is highly dependent on signage and wayfinding to compensate for its complexity and provides a leisurely, meandering pedestrian route. It is not an efficient, strategic pedestrian and cycle route that can fulfil a higher-level role in the transport network.

3.3.24 Mr Clark (para. 7.12) states Reading's historic town centre has built up to have few long straight axial view corridors and key corridors such as Broad St., Friar St. etc. are aligned to provide only short or curving corridors which are characteristic contrary to CR2(a).

3.3.25 Mr Clark is partly referring to the medieval town of Reading, centred on the Abbey. The urban morphology of the town today is not as Mr Clark claims. The two broadly parallel east-west main streets (Broad Street and Friar Street) are complemented by the three main north-south routes - West Street/St Mary's Butts, Station Road/Queen Victoria Street, Blagrave Street/Market Place/Duke Street (and smaller streets and alleyways extending north-south between). This is most definitely an open grid structure, albeit a distorted grid, with remarkably long sight lines, contrary to Mr Clark's claims. The strategy for Central Reading is to replicate the qualities of this efficient, open grid morphology to the north of the railway (LP CR2a).

3.3.26 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. I, therefore, fail to understand why the Appellant adopts the position, and marshals evidence, to demonstrate this is impracticable or unreasonable.

3.4 Alignment/directness

3.4.1 The alignment of the proposed route is indirect when a direct route required by policy is feasible.

Statement of case (Soc 2.11)[6]

3.4.2 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.

3.4.3 Policy and guidance are clear that the link thought 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]

3.4.4 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.

3.4.5 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.

3.4.6 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.

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6 Figure references amended to refer to the revised Figures appended to this Proof of Evidence.

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

3.4.7 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.

3.4.8 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)

3.4.9 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.

3.4.10 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.

3.4.11 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.

3.4.12 I attach several sketches (see Figures 27-29) 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].

3.4.13 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).

3.4.14 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.

3.4.15 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 Figures 3-5). 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.

3.4.16 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.

3.4.17 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

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.

first proposed at least twenty years ago in a detailed masterplanning study by Gibbs (see Figure 23) 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 extract at Figure 24) and a City Centre Framework Study in 2002 (see Figure 22). 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.

Further Discussion

3.4.18 The NDG is crystal clear that direct routes with good sightlines create routes people want to use and helps to prioritise pedestrian and cyclist journeys. (NDG para 82 - Active Travel and NMDC Part 1 para 58(ii)). Direct routes are more efficient (NMDC Paragraph 18 of M.1(i), 'The Street Network') whilst visible destinations encourage people to walk and cycle. (NDG Section M2 Active Travel para. 83).

3.4.19 Local policy and guidance are clear that the link thought 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) [9].

3.4.20 Figure 33 shows the massing and form of the Appeal Scheme when viewed from the Riverside. In my view, this clearly shows how the scheme presents a series of visual obstacles and physical barrier and diversions that work against any obvious, natural, desire line from the station to the River.

3.4.21 The figures appended to this Proof explore how alternative site configurations can better fulfil the purposes. For example, Figure 8 demonstrates a potential direct route and straight line of sight across the Appeal Site. Figure 27 shows an amended arrangement of ramps and stairs that better align with the flow of the route. I consider the configuration of ramps and stairs further below.

3.4.22 Figures 28 to 31 show various configurations of route that provide a direct link between the station square and Riverside. Figure 34 shows the resulting built form and massing.

9 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

3.4.23 Figure 32 shows a direct line of sight from the station entrance building to the Riverside with the resulting massing and form shown at Figures 35 and 36. In my view these sketches demonstrate both the practicality and desirability of a direct route and straight line of sight framing views.

3.5 Alternative route alignments

3.5.1 Alternative route alignments have not been fully explored.

Statement of case (SoC 2.12)

3.5.2 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.

3.5.3 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.

3.5.4 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 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.

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

Further Discussion

3.5.6 Figures 27 to 36 explore four alternative options for the alignment of the route that better fulfil or fully meet policy and guidance.

3.5.7 The sketch options are 'proving drawings' that, in my view, can be satisfactorily developed into fully detailed schemes. This process would need to take account of the final configuration of the outline application scheme for the Reading Station Park, the position of any future pedestrian crossing at Vastern Road, and the final configuration of the Northern Station Square.

3.5.8 I have not undertaken a detailed assessment of the effect of the alternative alignments on the development capacity of the site. However, as a broad indication, the sketch scheme shown at Figure 31 results in a 13% reduction in building footprint compared with the Appeal Scheme.

3.6 Alignment and configuration of ramps

3.6.1 Alternative configurations of ramps and stairs have not been fully explored.

Statement of Case (SoC 2.13)

3.6.2 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 27 for example). The Appellant then relies upon a post hoc rationalisation of the scheme as submitted.

3.6.3 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. My Figure 27 shows that this arrangement is not necessary, and a better arrangement is possible. Mr Taylor's Appendix 14 (para 6.29) examines only one alternative scheme that is unnecessarily constrained by an unwillingness to vary other scheme constraints (see 3.6.10 below).

3.6.4 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.

3.6.5 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.

3.6.6 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.

3.6.7 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.

3.6.8 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.

3.6.9 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 27).

Further Discussion

3.6.10 Mr Clark's Appendix 14 (para. 6.29) suggests another ramp arrangement would not work (e.g. at 6.37 and Figure 6.7) citing various technical guidelines. His thinking is clearly limited by a need for the ramp to rise to the height of the Block D podium (which is higher than the southern end of Christchurch Bridge) and meet the established block entrance levels in the scheme as designed. He is also clearly reluctant to contemplate adjusting building footprints and vehicle circulation routes and car park access. Finally, he criticises his alternative scheme because it results in retaining walls and structures when I can see that the Appeal Scheme relies on several retaining wall structures.

3.6.11 As noted in the section above, 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 are only more direct in comparison with the tortuous switchback ramp arrangement proposed. The need for an alternative, separate route for pedestrian in order to make the cycle route work is in my view an indication that the ramp and stair arrangement is unsatisfactory. I state above that the proposed pedestrian route via the steps is still far from direct. This is because it introduces a deflection in the route, even if this is one less deflection should a pedestrian t follow the switchback ramp. My figure 36 shows a route form the Station to the river with no horizontal or vertical deflection whatsoever. My Figure 34 shows a serpentine ramp where there are only very small shifts in alignment.

3.6.12 Figure 27 shows a sketch of an alternative ramp configuration (working within the parameters of the Appeal Scheme). The alignment is a serpentine form to deter cyclists speeding that nevertheless avoids the switchback arrangement in the Appeal Scheme that leads to conflicting paths and congestion.

3.6.13 The alignment closely follows the natural desire line towards the river and is a more efficient movement corridor as a result. There are alternative routes for pedestrians via stairs, but these may not even be necessary with this arrangement.

3.6.14 This ramp arrangement avoids the need to rise up to the level of the podium in front of Block D and then down to the level of Christchurch Bridge - an unnecessary and undesirable feature in the Appeal Scheme.

3.6.15 Figure 32 (developed principally to demonstrate a direct line of sight form the station entrance to the River) shows how the route down to the Riverside path can be untangled from the more complex ramp arrangement needed to rise up to the bridge level.

3.7 Landscape

3.7.1 The ambition for a 'green link' has been minimally provided for and cannot be considered a material benefit of the scheme.

Statement of case (Soc 2.14)

3.7.2 The policy requires that the route is landscaped and provides a 'green link (LP CR2, CR11 v, CR11g; RSAF para 5.6). [10.] 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 25 illustrates an example of a green link through residential development taken from Natural England's Green Infrastructure Guidance.

3.7.3 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'.*

3.7.4 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)*.

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

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

Further Discussion

3.7.6 Figure 40 shows how the complicated switchback ramp arrangement dissects the potential areas of open space into small strips of limited utility as usable open space.

3.7.7 Figures 27 and 36 show how alterative ramp arrangements offer more potential for practicable, usable open space to be created.

3.8 Width

3.8.1 The width of the pedestrian-cycle route is too narrow and narrower than other sections of the route.

Statement of case (SoC 2.15)

3.8.2 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.

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

- Christchurch Footbridge - 4-6.75m wide[11] (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 wide[12] , 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 12.5m wide at its narrowest point.
- The Station foot tunnel is 4m at its narrowest pointing widening out at the northern entrance.

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

- The ramp set within the northern station interchange (the north entrance to the Station foot tunnel) is approximately 8.5m 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 approximately 5m wide (that connect to the existing pedestrian access from the station to Christchurch Bridge).

3.8.4 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.

3.8.5 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.

3.8.6 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 Figures 28 and 29)) demonstrates that there is no need for this to become an *'either or'* situation.

3.8.7 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.

Further Discussion

3.8.8 Mr Taylor's Appendix 14 (para 6.48) correctly points to the fact that the width of the route is a key indicator of design quality. He claims a 3m width was specified by officers in pre-application discussions. However, he provides a cross reference to his para. 3.6.2 (pre-application advice) that does not support his view:

'The shared surface through the middle of the Site was not considered acceptable and should be replaced with a "3m [wide] dedicated [foot/cycleway] route" and separate vehicular carriageway.'

3.8.9 The LPA advice relates only to the middle section of the site, not the route as a whole. The 'middle of the Site' in the Appeal Scheme provides a level, direct, shared surface and parallel stetch of highway that provides additional capacity for cyclists. The LPA pre-application advice does not support Mr Clark's interpretation.

3.8.10 Mr Taylor's Appendix 14 (para. 6.52) emphasises the route is as wide as 5 metres where the switchback ramp changes direction. That, of course, is only a partial remedy to a problems the switchback ramp arrangement creates.

3.8.11 Mr Taylors discussion on width (Appendix 14 paras 6.47-52) ranges across several points. My own view is that the route is too narrow at 3m. It should be no narrower than 4m, the narrowest width of Christchurch Bridge. A generous width would be up to 5m wide (the width of the pedestrian crossing on Vastern Road at the entrance to the northern station interchange - specifically designed to carry pedestrians across Vastern Road either to the existing riverside link or, later through the Appeal Site to Christchurch Bridge).

3.8.12 Mr Taylor's figures 6.8 (Union Street) and Figure 6.9 (Chain Street) clearly cannot function effectively as combined pedestrian and cycle route alongside the commercial functions of the streets. They are of limited use for comparison purposes where the proposed development is primarily residential apartments.

3.8.13 Figure 6.10, Christchurch Bridge, indicates the section of the bridge that is 4m wide. Mr Taylor suggests (para 6.5.1) the inward leading balustrades create a functional width of 3.5m whilst the width of the ramp in the Appeal proposals is not constrained in any

similar way. I do not agree. The bridge railings are both tall (which Mr Taylor acknowledges) and inward sloping. This creates a constrained but still useful space below the railings for buggy pushers, wheelchair users, and pets to move to one side (and young children stopping to peer through the railings) and allow other bridge users to pass by. The perception of width, generosity and quality is also greater.

3.8.14 Mr. Taylor's Figure 6.10 shows the route through the middle section of the site. As I note elsewhere, this section of route is straight and level with potential congestion relieved by a parallel access road that provides additional capacity for cyclists to pass by. I note that the vehicle crossovers (in the foreground and at a point just beyond the pedestrians in the view) will cause pedestrians and cyclists to gather where cars are crossing the path. This potential point of conflict would indicate to me that the path should be widened (as the Appellant proposes for the switchback sections of the ramp).

3.9 Visual links

3.9.1 A direct line of sight from the station square to the river is fully practicable.

Statement of case (SoC 2.16)

3.9.2 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.

3.9.3 Good sightlines are supported by national guidance. MHCLG's Guidance Notes for Design Codes confirms: *"Good sightlines aid wayfinding"* (paragraph 34).

3.9.4 The policy requires visual links through the Appeal Site (LP para 5.4.6; RSAF para 7.10) [13]. 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 Figures 29-31).

3.9.5 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."

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

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

3.9.8 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."

3.9.9 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).

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

3.9.10 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. 3.4), this analysis hinges on visual links between the bridge and Station, not the Thames and Station square, which the RSAF requires.

3.9.11 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'.*

3.9.12 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 and guideline 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 50).

Further Discussion

3.9.13 The RSAF (Chapter 7 para. 7.10) attaches 'particular significance' to a new view along the direct north-south link between 'the Station and the Thames', where there should be an 'unbroken line of sight'. The origin and focus points of the proposed new view are as indicated in RSAF Figure 7.2 - a 'New public space on Thames looking south' and 'Station Square north looking north'. 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.

3.9.14 Figures 32, 35 and 36 show an alternative sketch layout with a direct line of sight from the station entrance to the riverside.

3.9.15 Figures 31 and 34 show an alternative direct line of sight from the Station Square to the Riverside.

3.10 Quality of the public realm

3.10.1 The design quality of the public realm is insufficient and is not commensurate with the overall strategic significance of the route.

Statement of case (SoC 2.17)

3.10.2 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).

3.10.3 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.

3.10.4 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).

3.10.5 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.

Further Discussion

3.10.6 Public space sits amongst the ten characteristics of well-designed places set out in the NMDC, which should that be well-located, high quality and attractive (P1), well-designed and safe (P2) and support social interaction (P3) (NMDC Part 2 Chapter 12).

3.10.7 CR3(i) requires that the Allocated Site provide new public open space or civic squares integrated with surrounding development. CR11(v), Station/River Major Opportunity Area states requires additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames.

3.10.8 Public space is desirable, where possible. The Appellant's position is that the north south link, as a linear public space, is necessarily constrained. I agree there are practical constraints. However, some constraints are self-imposed and the result of the Appellant's programme for the site - principally high-density.

3.10.9 The quality of the linear open space could be drastically lifted where it followed a direct alignment with a direct line of sight from station to River. For example, Figure 34 shows an aligned linear open space that 'borrows' open space within the proposed Reading Station Park development and part of the Station Square to create a sense of a more generous and extensive open space. Each part adds to the whole and the combined effect is greater than the constituent parts.

3.10.10 In contrast, the non-linear, fragmented and visually segregated public spaces in the Appeal Scheme (see figure 33) cannot add up to anything greater than their individual parts.

3.11 DAS Wayfinding

3.11.1 The proposed Wayfinding measures cannot substitute or adequately compensate for a route that is not easy to navigate in the first place.

Statement of Case (SoC 2.19)

3.11.2 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*[14]*. For instance, using feature trees along a route; inclusion of details within the paving* pattern; and the **positioning of buildings to frame and deflect views and movement'** (my emphasis).

3.11.3 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

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

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.

3.11.4 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'.

3.11.5 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.

3.11.6 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.

3.11.7 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.

Further Discussion

3.11.8 Figure 47 shows how Christchurch Bridge is poorly framed and largely occluded in views towards the River, even when those views open up after travelling half way through the Scheme from Vastern Road.

3.11.9 Figure 36 shows how a direct route and line of sight from the Riverside to the Station, with the station building framed at the end of the route, acts as a beacon to draw people along the route. This arrangement is far superior to any wayfinding scheme.

3.11.10 The best of a local example of a direct line of sight focused upon a landmark building is Station Road Reading and the view towards the historic station building and clock tower. This is illustrated in the Appellant's Representative View P1 (Station Road next to RBS, looking north - existing). The design of the station redevelopment scheme has been composed around this view with the new southern station entrance and concourse overbridge deliberately off-set to the west. The RSAF establishes the same principle for the approach to the northern station entrance from the Riverside.

3.12 Accordance with the RSAF

Statement of Case (SoC 2.20)

3.12.1 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.

3.12.2 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.

3.12.3 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.

3.12.4 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.

3.12.5 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.

Further Discussion

3.12.6 The building footprints shown in the Proposed Layout at Page 55 of the DAS are the result of the application of 'Design Principles' set out at section 3.1 of the DAS (pages 54 and 55).

3.12.7 Some of the Appellant's guiding urban design principles (DAS page 55) do not follow from, or conflict with, the RSAF guidance. For example, Principle 11 (Use of buildings to deflect vistas and define the public route through the site) conflicts with the RSAF visual link from the Station Square to the Riverside. Principle 15 (Introducing a landmark building as a way-marker along the pedestrian / cycle route).

3.12.8 The layout as first submitted by the Appellant does not follow from the RSAF. The further design evolution undertaken by the Appellant has been unreasonably constrained by an inflexibility in relation to building footprints, building entrance levels and the arrangement of the podium structure to Block D. The building blocks have not evolved in response to the LPA's attempts to negotiate design changes to ensure accordance with the RSAF and other policies and guidelines.

3.12.9 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- whilst

Developments that fail to reflect local design policies and government guidance on design should be refused (NPPF paragraph 134). In my view, the Appeal Scheme does not reflect local design policy. The Appellant has not demonstrated why it has proven necessary to diverge from guidance.

3.13 Summary and conclusions

3.13.1 The proposed link is insufficiently strategic in scale and ambition and will not properly fulfil the purposes for which it has been planned: It will act as a 'throttle' on the north south route.

3.13.2 My evidence, especially sketch layouts, demonstrates that a direct alignment required by policy is clearly feasible. It remains a puzzle why alternative route alignments and configurations of ramps and stairs have not been fully explored by the Appellant.

3.13.3 The design quality of the public realm is insufficient and is not commensurate with the overall strategic significance of the route. The ambition for a 'green link' has been nominally provided for. The spaces are fragmented and of limited utility and cannot be considered a material benefit of the scheme.

3.13.4 The width of the route is too narrow and narrower than other sections of the route.

3.13.5 The proposed pattern of development is insufficiently connected, permeable and legible. The proposed Wayfinding measures cannot substitute or adequately compensate for a route that is not easy to navigate in the first place.

4 RIVERSIDE

4.1 Introduction

4.1.1 I believe the proposals will 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.

4.1.2 The LPA 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.).

Description

4.1.3 A description of the riverside setting and the height and proximity of the Appeal Scheme to the River is given at 3.2 of my SoC.

Policy and guidance

4.1.4 I refer to policy and guidance of relevance to the riverside in the following sections. A fuller introduction to relevant policies and guidelines is set out at section 3.6 of my SoC and cross referenced below as necessary.

Format of this chapter

4.1.5 For clarity, and to assist the Inspector, sections of the discussion in the SoC text are exactly reproduced under each heading below followed by further discussion under a separate subheading. In large part, this further discussion directs the reader to the design studies set out in the accompanying figures (Appendix A).

4.2 Setting

4.2.1 The riverfront comprises three main character areas or urban character types, and the effects of the development on each should be considered.

Statement of case on 'the characteristic of riverside built form' (SoC 3.15)

4.2.2 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).

4.2.3 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 21 sets out an analysis of riverside spaces, including the outline of the Appeal Proposals.

4.2.4 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?

4.2.5 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.

4.2.6 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.

Further Discussion

4.2.7 NPPF 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).

4.2.8 Part 2 of the National Model 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 and

include 'Context': Understand and relate well to the site, its local and wider context (C1) and; value heritage, local history and culture (C2).

4.2.9 For the proposed development to be fully integrated into its setting (the *'receiving environment'*), this setting must first be carefully understood.

4.2.10 The Appellant has relied on a selective and revisionist approach to the contextual analysis in the Reading Tall Buildings Strategy to establish a baseline assessment of the context and setting (see Appendix D TVIA).

4.2.11 Section 7.0 of Mr Clark's Appendix 16 sets out his townscape and Visual Response to the Council's Position (Appendix 16 7.21-4). His main case is that the combination of removing the existing utilitarian character of the Appeal Site from the townscape and replacing it with *'a visually-interesting and locally-distinctive arrangement of built form, soft landscape and public realm along the river frontage'* will provide an improvement in the character of the river corridor.

4.2.12 There is no dispute that development of the Site in a way that is responsive to context can bring beneficial changes. However, I dispute Mr Clark's characterisation of the riverside setting and his judgement on what represents an appropriate improvement to this setting.

4.2.13 Mr argues that the proximity and height of the built form will provide *'drama '*at the riverside (para. 7.22) comparable to Clearwater Court. In my view, the appropriate approach to the Riverside should be guided by a far more modest relationship between built development, the River, and the Meadows. The drama already provided by the River Thames itself, the bucolic and open character of the meadows and the landmark Christchurch Bridge. The proposed development should be subordinate to this arrangement with mass and height rising gradually to the south towards the station and central core. The Appeal scheme subverts this carefully graduated strategy.

4.2.14 Clearwater is some distance from the Appeal site and frames the approach from Reading Bridge, a major road gateway into the town centre. It is also the reciprocal of Reading Bridge House on the opposite side of the Road. The Appeal Scheme with its

rooftop plant is taller than Clearwater Court whilst the riverside setting and immediate context of the Appeal site here is completely different.

4.2.15 Mr Clark argues that the Appeal Scheme provides a *'transition'* from the Riverside to the Station height and massing and the town centre (Appendix 16 para. 7.23). There can be no transition if the proposed Block D is the tallest riverside building between Reading and Caversham Bridges and only a shade lower than proposed buildings on Vastern Road (Appeal Site Block B and Reading Station Park).

4.2.16 Mt Clark's characterisation of a *'dramatically intensifying urban area'* disregards the large tracts of the riverside setting and the greater part of the adjacent setting where no change is proposed and building heights are modest.

4.2.17 I suggest there are three main character areas or urban character types north of Vastern Road- Riverside and meadows, Thames Path and the Riverside Strip.

Riverside and meadows

4.2.18 The northern boundary of the Appeal Site is bounded by the River Thames and overlooks Fry's Island and Christchurch Meadow. The River Thames is c.30m wide at this point and spanned by a cable-stayed footbridge and cycleway with a span of around 30m. 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. The northern boundary can be characterised as open and therefore particularly sensitive to inappropriate development forms that can easily cause harm.

4.2.19 Riverside EN11, Waterspaces, confirms 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.

4.2.20 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.

4.2.21 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.

Thames Path

4.2.22 I agree with the statement in the Officer Report, which 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.

4.2.23 I disagree with Mr Clark 's assertion (Appendix 16 para 7.28) that the "existing fence-topped retaining wall flanking the Thames Path and the lack of linkage from the bridge and Thames Path through to the station area" means that the 6.13 officer's comment that buildings do not compete with the river dominance is "wholly unfounded in the reality of the situation at the Appeal Site and the public realm enhancements". The removal of the boundary wall to the existing site, adjacent to the riverside path, would undoubtedly represent an improvement. However, I cannot envisage the wall being retained in any proposed redevelopment. My argument is that the proximity and height of the proposed buildings adjacent to the riverside path will result in a dominant and overbearing where my Figure 21 shows how adjacent developments are lower and set further back and set within a more generous open space setting.

4.2.24 In contrast with this generally open aspect, the southern stairs and approach ramp of Christchurch Bridge are framed by a weathering steel screen that has the effect of enclosing the northern edge of the Riverside Path. I consider this area particularly

sensitive to new development that is to close, too tall, with inactive frontages or a generally overbearing character.

Riverside strip

4.2.25 Developments along the south side of the Thames east and west of the Appeal Site extend south towards Vastern Road. I refer to this as the *'riverside strip'*. The riverside strip frames the southern edge of Christchurch Meadow.

4.2.26 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.

4.2.27 The riverside strip is characterised my medium scale budlings heights. Other than the Appeal Site, no major change is planned, and the strip lies outside the RSAF area.

4.2.28 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).

4.2.29 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).

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

4.2.31 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

4.2.32 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.

4.3 Baseline

4.3.1 The existing site conditions and setting have not been objectively assessed.

Statement of case (SoC 3.10)

4.3.2 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.

4.3.3 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.

4.3.4 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.

4.3.5 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.

4.3.6 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.

4.3.7 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'.

4.3.8 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.

Discussion

4.3.9 NMDG Part 2 sets out ten characteristics of well-designed places based on the objectives for design set out in Chapter 12: Achieving well-designed places of the National Planning Policy Framework including 'Context': Understand and relate well to the site, its local and wider context (C1) and; value heritage, local history and culture (C2).

4.3.10 There is no dispute redevelopment is desirable and will bring benefits, which should be measured against baseline. This baseline can and should be objectively assessed and I would therefore expect the Appellant's Townscape and Visual Impact Assessment (TVIA) to establish common ground on these matters. Unfortunately, that is not the case. Appendix C: TVIA sets out a series of comments and criticisms of the Appellant's TVIA methodology. This has an important bearing on RfR 2 because many of the impacts on the riverside I have highlighted (such as the appearance and setting of the riverside path on either bank and the view from Christchurch Bridge) are not fully represented or assessed in the TVIA.

4.3.11 In my view, the TVIA establishes a false premise- that the Appeal Site has few if any positive urban environmental qualities, the Appeal Site is generally surrounded by areas of poor urban environmental quality and subject to major planned change.

4.4 Gateways

4.4.1 The height, scale, massing, and public realm, taken together, will not form an appropriate gateway and will diminish or detract from Christchurch Bridge-the preeminent gateway from and to the Meadows and the Town Centre.

4.4.2 The formation on an appropriate gateway is the principal justification for the proposed the mass and height of the appeal scheme at the riverside. I believe both Mr Clark and Mr Taylor are fundamentally incorrect in their design approach in relation to gateways and this lies at the heart our differences in relation to height and massing.

Statement of case (SoC 3.14)

4.4.3 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).

4.4.4 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.

4.4.5 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.

4.4.6 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.

4.4.7 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.

4.4.8 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.

4.4.9 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.

4.4.10 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.

Discussion

4.4.11 The attached sketches illustrate the unsatisfactory relationship with the bridge (Figure 47, 48).

4.4.12 Mr Clark (Appendix 6.60 and 6.73) asserts that this is a key gateway to the centre of Reading comparing it to the approach over Reading Bridge. In my view this is a category mistake. Reading Bridge is a key road gateway into the town centre of a completely different setting, scale, form, and function from Christchurch Bridge. The Appeal Scheme can and should adapt and respond to the distinct setting, scale, form, and function of Christchurch Bridge.

4.5 Massing

4.5.1 The mass of the proposed development is uncharacteristic and harmful to the riverside setting.

Statement of case 'riverside built form' (SoC 3.12)

4.5.2 The height, massing, and footprints of the riverside buildings, whilst architecturally interesting, are poorly related to the public spaces and routes to the watercourse.

4.5.3 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 terrace[15].

4.5.4 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

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

London. 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 (see Figures 10 and 11). 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.

4.5.5 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).

4.5.6 I have already addressed in the section above the points raised at SoC 3.113 [16]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'.*

Discussion

4.5.7 Policy and guidance emphasise the need to effectively use land and pursue higher density development, where this appropriate. NPPF Chapter 11 (para. 119) 'Making effective use of land' promote the effective use of land in meeting the need for homes and other uses. LP Housing Policy H2 states higher density development can be justified.

4.5.8 The emphasis on higher density is carefully qualified. Higher density development must be provided while safeguarding and improving the environment and ensuring safe and healthy living conditions (NPPF para. 11) whilst higher density development is justified in H2 where proposals achieve high-quality design and minimise environmental impacts.

4.5.9 Part 2 of the National Model 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 including

16 I have exactly reproduced my SoC text here. The correct cross reference is to the Appellant's SoC. Para 3.11.3. The text in my Soc to which I refer to as 'above' is reproduced at 4.7.4 this Proof. However, when looking at Mr. Clark's Appendix 16 I can find no such reference.

understanding and relating well to the site, its local and wider context (C1) (NDG page 11), responding to existing local character and identity (I1) (NDG page 15), a compact form of development (B1) (NDG page 19) with appropriate building types and forms (B2) (NDG page 19).

4.5.10 Notwithstanding this positive encouragement for higher densities, in my view, the Appeal proposals are a notably dense and tall form of development with massing that is uncharacteristic and harmful to the riverside setting.

4.5.11 The Appeal scheme comprises several blocks of development. The northern ends of Block D, The Turbine Hall and Block E, Christchurch Wharf, form the immediate riverside setting. The rear wings of Block D, The Generator and Block F, The Coal Drop Building also frame the riverside setting along with Block C, The Goods Office. All these Blocks frame a proposed riverside open space with a cafe building in its centre. Further to the south, Blocks A and B also help to frame the riverside setting by forming a background to views from the Meadows and infilling gaps between the blocks nearest the riverfront.

4.5.12 Figure 26 gives dimensions for the proposed river frontage.

4.5.13 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%.

4.5.14 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.

4.5.15 Figure 33 and Figures 39-49 are based on the application drawings inserted into the area model used for the RSAF study. These show the Appeal Scheme in its current context and taking account of proposed future surrounding development.

4.5.16 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.

4.5.17 The massing of the Appeal Scheme has been carefully crafted to appear more sensitive to the context in representative views prepared by the Appellant and mitigated by planting. However, the approach to massing is clearly cruder when viewed from alternative points. For example, Figure 41 shows how the mass is stacked up on the riverside frontage equivalent to the proposed massing on the Vastern Road frontage.

4.5.18 Figure 41 clearly demonstrates how the massing, and the riverside has been built up to closely match that at Vastern Road. Despite the Appellant's claims, there is no clear distinction or gradation in massing from lower at the riverside and higher towards the station, as the RSAF requires. Figure 48 show how the mass of the proposed riverside blocks viewed from Christchurch Meadow will appear to be just as high as development to the rear facing Vastern Road.

4.6 Height

4.6.1 The proposed buildings are too tall in relation to the riverside setting.

Statement of case (height) (SoC 3.13)

4.6.2 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.

4.6.3 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.

4.6.4 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.

4.6.5 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.

4.6.6 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.

4.6.7 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).

4.6.8 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.

4.6.9 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.

4.6.10 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.

Discussion

4.6.11 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."

4.6.12 Therefore, the analysis of the effects and opportunities for tall buildings set out in the Tall Buildings Strategy[17] 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.

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

4.6.13 LP 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. The strategy sets out where and why it is inappropriate to build tall and the setting may be harmed if such development is allowed. Areas defined as sensitive to the effects of tall buildings can also be harmed by buildings taller than their surroundings, even where they fall just below the tall building threshold.

4.6.14 CR10 should not be misread as positive encouragement to build up to the threshold in adjacent areas. There is a clear policy objective to see a stepped reduction in building height from the Central Station Cluster to Thames riverside.

4.6.15 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.

4.6.16 The specific height guidance for the SSE 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.

4.6.17 The proposed buildings are too tall in relation to the riverside setting. Figure 48 clearly shows how the riverside blocks will appear as tall as proposed development on Vastern Road when viewed from Christchurch Meadow.

4.6.18 Riverside Block D, as amended, rises to 11 storeys when the 2.4m tall plant room at 11th floor level is included. The block rises to 32.75m from car park slab level- just shy of the 35m tall building threshold. This is only 2.25m lower than the tallest proposed Block B facing Vastern Road, which exactly meets the tall building threshold.

4.6.19 It seems clear to me that building heights have been determined by a desire to build up to the absolute maximum with far less consideration of what might be an appropriate height and massing. For example, Mr Taylor (Appendix 14 para. 6.68) asserts that Block D is of a scale with reading Bridge House without explaining why this physically distant building is an appropriate example draw on.

4.6.20 The CABE tall buildings guidance document, referenced in the Reading Tall Buildings Strategy (page 2), talks about 'contextually tall' buildings. Within the context of central Reading, the Strategy notes the predominant building height is between 3 and 5 storeys. This is certainly true for the Riverside Strip.

4.6.21 The only reasoned justification from the Appellant why it is necessary to disregard both the recommended heights and massing principles in the RSAF is that this is necessary to form a gateway of appropriate significance - and there are comparable examples nearby. I do not agree with this as set out under the section on gateways above.

4.6.22 I cannot see how reduction in height to meet guidance would result in any diminution of the significance of the gateway. In fact, such a reduction would better emphasise the significance of Christchurch Bridge- the gateway of greatest significance that is already in place and to which, in my view, the Appeal Scheme should be subordinate.

4.6.23 Of greatest concern is that one of the two tallest buildings proposed is on the riverside when the clear thrust is that buildings heights should diminish towards the riverside and adjacent riverside neighbourhoods, not rise up.

4.7 Riverside path

4.7.1 The development is harmful to the setting of the riverside path.

Statement of case (SoC 3.11)

4.7.2 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.'*

4.7.3 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.

4.7.4 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.

4.7.5 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.

Further Discussion

4.7.6 Figure 49 shows a sketch of the basic relationship of the Appeal Scheme to the Riverside path. It does not show proposed mitigating features such as grass areas shrubs and planting in order to focus on the main physical components that frame the setting of the path.

4.7.7 In my view, the combination of the metal screens to the bridge approaches, the dead frontages of the buildings at riverside path level create a poor relationship in which walkers using the path will feel subordinate to, and dominated by, the development rising above.

4.7.8 The Appellant has sought to argue that surveillance from windows and routes on the storeys above are equivalent to active frontages at river path level. The illustration at page 109 of the Appellant's DAS purports to show there will be '*natural surveillance from dwellings'.* The drawing offers a distorted view, because the first-floor level of Block D is shown as equivalent to the ground floor of Block E. The ground floor of Block D, at towpath level, comprises metal grilles opening onto podium parking.

4.8 Public realm

4.8.1 The proposed public realm is poorly related to the riverside setting in certain respects, and some of the effects will be harmful.

Statement of case 'north south link and riverside open space' (SoC 3.17)

4.8.2 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.

4.8.3 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.

4.8.4 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.

4.8.5 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'*.

4.8.6 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.

4.8.7 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.

4.8.8 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.

Discussion

4.8.9 The three key elements of the public realm in the RSAF 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). 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 direct pedestrian route
- footbridges
- new riverside parks
- amenity space for new residents
- enhancements including wider pavements and greater pedestrian
- incorporate a 'green link' towards the river
- Buildings will face onto the spine rather than away from it
- frontages will be enlivened with active uses including retail and leisure

4.8.10 The height, massing, and footprints of the riverside buildings, whilst architecturally interesting, are poorly related to the public spaces and routes to the watercourse.

4.8.11 Mr Clark (SoC Appendix 16 para. 7.27) believes there will be enhanced animation of the routes and spaces, through active human interest on building frontages and associated with the café and other seating, and enhanced passive surveillance from adjoining buildings.

4.8.12 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 terrace[18]. In my view, the riverside path will mostly lack human interest on building frontages at the river path level.

4.9 Proximity to the riverside

4.9.1 The massing and height are compounded by locating buildings so close to the river's edge.

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

Statement of case 'setbacks' (SoC 3.16)

4.9.2 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.

4.9.3 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.

4.9.4 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.

4.9.5 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.

4.9.6 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.

4.9.7 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.

4.9.8 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 Figures 10 and 11).

4.9.9 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.

Discussion

4.9.10 The excessive massing and height of the Appeal Proposals are compounded by locating buildings so close to the river's edge. Figure 26 gives my measurement of set-back dimensions.

4.9.11 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.

4.9.12 The issue of setbacks should not be considered a dry technical point about dimensions. The proximity of proposed buildings, combined with their mass and height and their blank river path level frontages form unsatisfactory (and in design terms unresolved) areas of public realm at the level of the towpath, as outlined above.

4.9.13 This is compounded by the height and bulk of the Christchurch Bridge approach ramps and stairs and weathering steel screen that have a strong enclosing effect. The bridge

was designed in anticipation of a more open character to the adjacent development when the Appeal Scheme is close packed against the riverside and bridge.

4.10 TVIA

4.10.1 The TVIA has been relied upon in justifying the conclusions of the Mr Clark's Appendix 16 SoC. However, errors in it undermine those conclusions.

4.10.2 There are limitations and omissions in the TVIA undertaken by the Appellant. This is set out in more detail at Appendix C.

4.10.3 The principal concerns relating to RFR 2, height and massing, is the mischaracterisation and insufficient recognition given to low-rise development along the riverside strip and an exaggeration of the scale and extent of planned change in this area. I also note that the series of representative views selected fail to describe or to assesses the character and appearance of the riverside path.

4.11 Conclusions

4.11.1 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.

4.11.2 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 Meadow (para. 6.13). In my view, 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.

5 COMPREHENSIVENESS

5.1 Introduction

5.1.1 The proposals do not fulfil their part in ensuring a comprehensive approach to the development of the Allocated Sit CR11g. They are insufficient to ensure the remainder of the allocation will come forward and accord with policy expectations, including Policy CR11 Station River Major Opportunity Area and Policy CR2 and Central Reading.

Policy and guidance

5.1.2 A detailed assessment of policy and guidance on comprehensiveness is set out at 4.5 of my SoC and cross referenced below where relevant.

Format of this chapter

5.1.3 Part of my evidence on comprehensiveness is already set out in my SoC under several headings. For clarity, and to assist the Inspector, the relevant discussion in the SoC text is exactly reproduced under some of the heading below with further discussion under a separate subheading.

5.2 Defining comprehensiveness

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

5.2.2 National Design Code - 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. 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".

5.2.3 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). The good

planning or the area requires a comprehensive approach to development within and across these three policy units.

5.2.4 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.

5.2.5 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.'

5.2.6 The explanatory text to CR11 (5.4.10) states:

5.2.7 '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'.

5.2.8 LP Policy CC9 states 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.

5.2.9 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.

5.2.10 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.

5.2.11 Para. 13.1 states:

"A piecemeal, site by site approach to implementation risks the creation of disjointed and fragmented development with no cohesion. 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."

5.2.12 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.'*

5.2.13 The RSAF Principles (para. 3.6) state:

"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."*

5.2.14 The aims for the public realm (Chapter 5) include "Stitching' together the various development sites within the Area both visually and physically".

5.2.15 In summary, taking account of policy and guidance, I define comprehensiveness and the indicators of a fully comprehensive approach as follows:

- Development that is physically and socially integrated into its surroundings: -visually well related to the surrounding area; positively influencing and influenced by the context; and fully integrated into the surrounding area.
- Development according to a common set of guidelines.
- Development that contributes positively and proportionately towards the provision of policy requirements that benefit the whole area.

- Plans for individual sites are brought forward alongside sufficient information to show how the development will relate to the potential or planned development of neighbouring sites and fully demonstrate how neighbouring sites can also fulfil policy and guidance.
- A coordinated approach to the provision of area-wide and shared infrastructures, services, resources, and amenities.
- Individual developments are coordinated and physically integrated with area-wide plans and a phased implementation strategy, avoiding disjointed fragmented and incohesive development.
- A public realm that stitches together several development sites both visually and physically and provides a well-connected and accessible environment.
- Maximum quality of development and public realm.

5.3 LPA decision-making

5.3.1 The Committee Report and Update Report, particularly the latter, considered comprehensiveness and concluded that compliance with CR11 viii had been demonstrated. It was not recommended to include this as a reason for refusal.

5.3.2 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 acceptably.

5.3.3 The Update Report in paragraph 7.2 highlights continuing officer 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).*

5.3.4 The recommendation not to apply RfR6 in no way diminishes the strength of Officers stated concerns in relation to the other reasons for refusal, particularly height and massing and the quality of the north-south link, which are themselves indicative of the Appellant's failure to adopt a fully comprehensive approach.

5.3.5 This does not exclude the possibility that, had the recommendation been to approve, officers or Members may have recommended planning conditions (including revising, phasing and 'Grampian' conditions), and possibly also terms to be added to a legal agreement.

5.3.6 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'.*

5.3.7 I immediately note that the officer view that the proposals '*adequately demonstrated that the proposed development would not prevent the remainder of the sub-area from fulfilling the CR11 aspirations'* falls far short of the definition of comprehensive development provided above. I am therefore not surprised that LPA Members recognised the officers highly qualified support and disagreed with their conclusions.

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

5.3.9 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.

Member's discussion (SoC 4.4)

5.3.10 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 their intention that the site as a whole 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'*.

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

5.4 The limited scope of the detail on comprehensiveness

Statement of Case 'the appellant has not demonstrated a comprehensive approach' (Soc 4.8)

5.4.1 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.

5.4.2 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'.*

5.4.3 The information submitted is insufficient to demonstrate the required comprehensive approach.

5.4.4 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).

5.4.5 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.

5.4.6 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.

5.4.7 Mr Taylor provides a more detailed response within his SoC (Appendix 14) at 6.74-6.87 (including Fig. 6.4),[19] 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)[20]. I disagree this is a successful exercise.

5.4.8 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.

19 The correct cross reference is to paras 6.91- 6.109 of Mr Clark's Appendix 14. The cross-referencing arises first in the Appellant's main SoC.
20 This is a reference to para 3.197 of the Appellant's main SoC.

- 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.

5.4.9 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.

5.4.10 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.

5.4.11 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 Figure 20.

Further Discussion

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

5.4.13 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 or can be 'encapsulated' by new development - see below).

5.4.14 The Appellant's case is that the remaining SSE site is unlikely to come forward for development, even though that is exactly what was proposed when SSE and its advisors met with Cllr. Page prior to the Appellant's purchase of part of the SSE site. It remains unclear why the position has completely reversed.

5.5 Detailed assessment of the Appellant's comprehensive scheme

5.5.1 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).

5.5.2 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.

5.5.3 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'.*

5.5.4 The information submitted is insufficient to demonstrate the required comprehensive approach.

5.5.5 I refer to Figure 9 (the Appellant's Comprehensive Plan extracted from Section 3.9 of the DAS) alongside my Figure 20. an adapted version showing the actual ground level layout of the Appeal Scheme int its proper context.

5.5.6 The following text expands upon several shorter bullet points given at section 4.9 of my SoC and re-ordered below under new headings.

River frontage

5.5.7 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 north-eastwards 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.

Parking

5.5.8 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.

Public realm and active frontages

5.5.9 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.'

5.5.10 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.

Entrance

5.5.11 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.

North south links

5.5.12 An excessively 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.

5.5.13 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.

Density and efficient use of the land

5.5.14 The proportion of building footprint to open spaces and streets is low.

Single-aspect development

5.5.15 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.

5.5.16 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.

5.5.17 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.

Aspect and frontages

5.5.18 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.

5.5.19 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.

Flooding

5.5.20 It is unclear how flooding will be addressed within the SSE site or how the Appeal Scheme flood measures and mitigation can be effectively combined with later measures implemented on the SSE site.

Connections between the parts of the allocated site

5.5.21 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- an undercroft car park entrance.

5.5.22 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.

Electrical equipment

5.5.23 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.

5.5.24 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.

5.5.25 I draw attention to the comments of Cllr. Page noted above (my notes based on viewing the Committee Broadcast).

"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."

5.5.26 The Appellant presents a single comprehensive scheme. There is no examination of an option to encapsulate the electricity equipment.

5.6 Locally listed building

Statement of Case (4.12)

5.6.1 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.

Discussion

5.6.2 The locally listed building sits at the boundary and entrance to the residual SSE site. The way this building could be integrated into the future development of the SSE site has not been fully explored. Looking at the DAS Figure 3.9 Comprehensive Development Plan (DAS page 105), I can see that forming a satisfactory future gateway to the SSE site

is problematic because the area of the gateway from Vastern Road is long and thin and dominated by the sheer 11 storey wall of proposed Block B. In my view, the retention of the locally listed building offers great potential to form a satisfactory future entrance here.

5.6.3 Without further assessment, my view is that a precautionary approach would indicate that the building be retained. This is the essence of the comprehensive approach where individual developments are coordinated and physically integrated according to a properly sequenced implementation strategy, avoiding disjointed fragmented and incohesive development to provide a well-connected and accessible environment.

5.7 Efficient use of the land

Statement of Case (4.13)

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

5.7.2 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'.*

5.7.3 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.

5.7.4 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).

5.7.5 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.

5.7.6 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."

5.7.7 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).

5.8 It is neither impractical nor unreasonable to expect a comprehensive approach

Statement of case (Soc 4.14)

5.8.1 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 6.14-16[21] 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.

Discussion

5.8.2 Mr Taylor (Appendix 14 para. 6.100) states that the width of the site adjacent to the main pieces of SSE equipment limits the potential design approaches. He goes on to outline three options explored at the initial design concept stage:

- No buildings in the central part of the scheme.
- Buildings that back on to the Lynmouth Road properties.
- Buildings that back on to the SSE site.

5.8.3 Mr Clark refers to the alternative of using landscaping to perform the screening function (para. 6.101), but this was not apparently fully assessed as an option - because using buildings would provide *'the most significant benefit to the development and existing residents whilst meeting the technical and planning policy requirements' (6.101).*

5.8.4 There is no reference to the option of encapsulating the SSE equipment, which SSE had earlier indicated to the LPA was both feasible and the preferred approach to the development of the comprehensive development of the Allocated Site (See Councillor Page's comments to the committee).

5.8.5 Whilst I cannot comment on the acoustic issues, I see that the options of an acoustic wall and landscaping or encapsulation were not fully explored. It was clearly dismissed at an early stage, never to be re-opened:

'Whilst minor adjustments were made during the pre-application stage, and during the application process, the principles of this approach were constant throughout.' (Appendix 14 para 6.10)

21 Se Figures 9 and 20 in this document and DAS 3.9 (page 105).

5.8.6 In view, the initial design concept stage was flawed. I do not agree it was entirely necessary to provide buildings backing onto the SSE site to provide visual and acoustic screening.

5.9 Conclusion

5.9.1 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.

6 CONCLUSIONS

6.1.1 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.

6.1.2 The proposed north-south link is of insufficient design quality and will become a 'weak link' in the strategic route from the town centre to the river and 'throttle' the proper functioning of the route. It cannot perform its proper role in the town Centre route hierarchy.

6.1.3 The proposed link is indirect with a cranked alignment and short sight lines, which conflicts with policy and guidance.

6.1.4 The Appeal Scheme does not fit comfortably within the current riverside setting where no other significant change is planned. The setting is particularly sensitive to development taller than existing heights. The development is not sufficiently set back from the water's edge, and the proposed height and massing in relation to the riverside is harmful. The Appeal Scheme will not form an appropriate gateway from the Meadows into the station area and town centre and vice versa.

6.1.5 The proposed height and masing is insufficiently subordinate to and will harm the setting of Christchurch Bridge and Christchurch Meadow,

6.1.6 The Appellant has submitted insufficient information to demonstrate that the Appeal scheme will play a full part in the comprehensive development of the wider area. The Scheme proposals inhibit the future comprehensive development of the adjoining SSE site.

6.1.7 It is, therefore, my opinion that the Appeal should be dismissed.

APPENDIX A- FIGURES

(See separate A3 folder)

APPENDIX B- MICHAEL DOYLE CV

Michael Doyle BA(Hons) DipUD DipTP MRTPI

B.1.1 Michael is an urban designer and town planner with thirty-five-year track record in senior positions in both private practice and local government. He is an affiliate member of the Institute of Historic Building Conservation and a former Arts Council/CABE Space Enabler.

B.1.2 Michael led the preparation of a range of masterplans and development frameworks, mixed use town and city centre regeneration strategies, transport and interchange design studies, and large-scale planning applications, negotiations and appeals.

B.1.3 He led the preparation of a new public realm policy and strategy for the City of London. He has prepared Design Statements for Reading East MRT and the completion of the Maidenhead ring road. He prepared initial concept design for the new Christchurch footway and cycle bridge in Reading and also drafted the Design and Access Statement. He prepared the Reading Station Area Framework and played a key role in the Reading Station Redevelopment (for Reading Council and Network Rail). He prepared the masterplan for Konza Technology City, Kenya, in association with Pell Frischmann.

8.1.4 Michael led the preparation of a series of city-wide and city centre strategies including Manchester City Centre Eastern Gateway Development Study (for Manchester City Council) and Nottingham City Centre Regeneration Framework (for Nottingham Regeneration). He has prepared development frameworks and sub-regional masterplans for areas including Northampton northern growth strategy (for Barratt), Swindon Regeneration Framework (for The New Swindon Company), Wembley Development Framework (for English Partnerships) and Kings Dock (Liverpool) Development Framework (for English Partnerships).

B.1.5 Michael has prepared a series of planning, design and development briefs, urban design guidelines and codes for major sites including the planning, design, and development brief for the New English National Stadium at Wembley (for Brent Council) and planned

urban extensions for the City of Truro (3500 dwellings) and Bathgate, West Lothian (1,500 dwellings).

B.1.6 Michael is an accomplished illustrator and is the Editor of 'Graphics for Urban Design' published by Thomas Telford.

B.1.7 Michael previously worked as Managing Partner of Doyle Tym Design; Urban Design Associate Director with David Lock Associates; Principal Urban Designer at the London at Brent, Conservation & Design Team Leader in Hackney and Senior Planner/ Urban Designer with Tibbalds Monro. His first job was with the Royal Docks Team at Newham Council which followed a one-year student placement at the London Borough of Lewisham.

C APPENDIX C: TVIA

C.1 LPA assessment (Soc 3.18)

C.1.1 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.

C.1.2 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.

C.1.3 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.

C.1.4 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).

C.2 TVIA methodology

C.2.1 There are missed steps in the Appellant's TVIA.

Assessment of alternatives

C.2.2 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.

C.2.3 In my view this can and should have included an alternative scheme following the RSAF guidance on height and massing.

GLVIA processes

C.2.4 I see only is limited evidence that the GLVIA3 components and processes have been followed.

C.2.5 Section A1.6 of the Appellant's TVIA states there are typically four key stages to TVIA, as follows:

- Baseline Studies;
- Design (mitigation is also linked to design in the Appellant's text at A1.9 and enhancement at A1.15);
- Assessment of Townscape and Visual Effects; and
- Cumulative Assessment (should this be required).

C.2.6 Whilst there is some scope to tailor the components and assessment processes undertaken in LVIA to suit the circumstances, I nevertheless maintain the Appellant has omitted LVIA components and processes that should have been included. Without these steps, the TVIA must be treated as an assessment of individual Representative Views rather than the integrated assessment envisaged in GLVIA3. I discuss below issues with the selection and assessment of the individual representative view assessments.

C.2.7 There is a considerable overlap between LVIA and EIA assessment processes. An LVIA that does not form part of a wider EIA will include fewer components. The required components of LVIA where EIA is not required are defined in GLVIA3.

C.2.8 Table 3.1 of GLVIA3 sets out the components of the EIA process and the role of LVIA. The table specifies required components of the LVIA process where EIA is not required. Taking those parts of the table highlighted in blue and noting the comments in the final column titles *'LVIA role in landscape 'appraisal'*. They are:

- Project description/specification
- Baseline studies
- Identification and description of effects.
- Assessment of the significance of effects.
- A fifth stage, 'mitigation', may also be required.

C.2.9 There is a clear divergence between the GLVI3 and the Appellant's approach at 9.2.5 above.

C.2.10 The final step of the assessment laid out in GLVIA3 has not been undertaken - the final statement of the significance of the effects and how this judgement was arrived at.

Tall Buildings

C.2.11 The TVIA draws upon the baseline assessment in the RTBS rather than undertaking a separate assessment. This can accord with GLV3 guidance provided the assessment is relevant and remains up to date. There is some limited scope to take issue or to update specific parts of the RTBS assessment. In my view the Appellant's TVIA takes a highly selective approach to the RTBS baseline assessment.

C.2.12 Section 2,28, follow on from a discussion of policy and guidance and the Area 22 in the Tall Buildings Strategy, mistakenly claims:

'In terms of Townscape Sensitivity to the inclusion of Tall Buildings, it is agreed that this is low, with potential for creating new key views and visual focal points.'

C.2.13 The Tall Buildings Strategy Character Area 22- Vastern Road text include the following, vital, conditionality:

However it is proposed that tall structures should not be developed along the north and western boundaries of the character area as these boundaries are shared with small scale residential areas. any proposed built form should respond in terms of height and scale to the residential area. The tallest structures should be located to the south of the character area, adjacent to the railway line.

C.2.14 This LVIA assessment contradicts the Tall Buildings Strategy (and the update) the RSAF, and Local Policy CR10.

C.2.15 Townscape sensitivity to the inclusion of tall buildings for the immediately adjacent character area (12), including Lynmouth Road, is described as:

High: There is a low capacity for the development of buildings of this scale due to the low rise, small scale residential character which predominates. Taller buildings would dilute the townscape pattern and would be uncharacteristic.

C.2.16 The LVIA goes on to focus on the fact that the assessment of CA12 does not refer to Great Brighams Mead and Caversham Bridge House. These are the only two exceptions to the general character of CA12. They are some distance from the Appeal Site and of a modest height. Great Brighams is 120m from the Site boundary and rises to three commercial storeys whilst Caversham Bridge House is 425m rising to 3 commercial storeys.

C.2.17 The LVIA is stretching a point to rely on these distant and relatively low-rise examples as a basis to set aside the RTBS assessment.

C.2.18 The LVIA (mischaracterizing the RTBS findings) seeks to dimmish the townscape character of the adjacent terraces:

2.32 Overall, based on this assessment, it is considered that the value of the townscape is medium-low as whilst there is some positive contribution to character from the relatively consistent style and scale of built form, these are common components with limited apparent recognition, including in the CA description.

C.2.19 That is not what the RTBS concludes (for CA12) , which states:

'The consistent architectural style create a strong townscape character.'

Locally listed buildings

C.2.20 Section 2.15 of the main LVIA report (January 2020) states:

'There are no Listed Buildings within the Site, nor do any heritage designations extend across the Site. However, the entrance building to the SSE site was added to the locally important buildings list by RBC in May 2017.

C.2.21 The Appeal Scheme proposes the demolition of the building. The LVIA does not assess the significance of the asset, the impacts of its loss, or the merits of an alternative scheme that retains the building.

Cumulative impact

C.2.22 I am at a loss to explain why the future development of the remainder of the Allocated Site has not been included in the cumulative impact assessment.

Sensitive receptors.

C.2.23 The LVIA does not undertake a systematic assessment of potential visual receptors. In place of this, the study jumps to a selection of 'Representative Views' for further study and the View becomes the 'visual receptor'. Column 1 of the assessment table identifies visual receptors.

C.2.24 The sensitive receptors that I would expect the LVIA to identify (and steer the selection of representative viewpoints) would include:

- Lynmouth Road residents- both views from the rear of dwellings and from Lynmouth Road.
- The locally listed entrance building.
- Walkers using the southern Thames Path.
- Walkers using the path on the northside of the Thames.

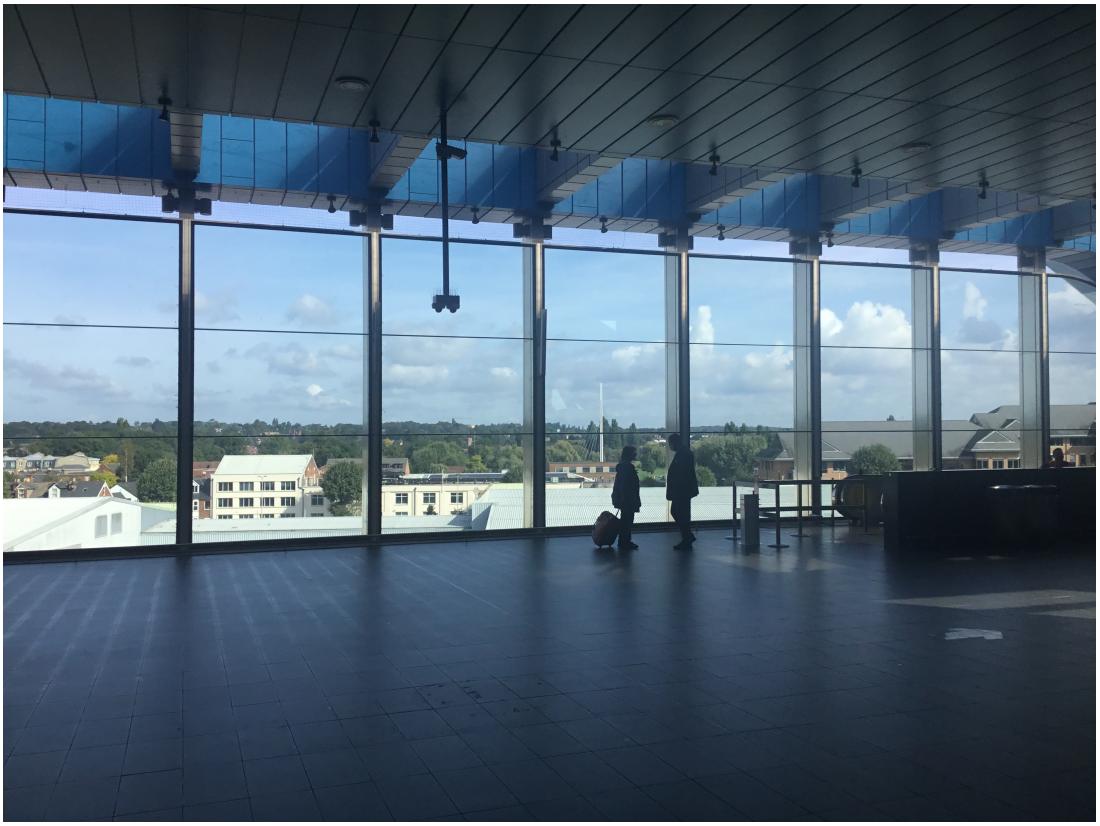
C.2.25 Very limited investigation is needed to identify these sensitive receptors- because they are already highlighted in policy and guidance.

C.2.26 Looking at the Appellant's LVIA, see that none of these receptors have guided the selection of representative views. Except for the locally listed building (which is laregly completely), none of the representative views develop in greater detail include these sensitive receptors.

C.3 Representative Views

View 3. Reading Station Overbridge

C.3.1 The attached photographs indicate the view from the concourse.



C.3.2 I completely disagree with the characterisation and consider the view towards and setting of the bridge and the river and meadows of high significance.

P2- Christchurch Bridge

C.3.3 This is described as the 'approach' to the bridge.

C.3.4 The position and angle of the selected view is such that a modest foreground tree occludes views of the greater part of the development. This view would be more representative if the position/angle was adjusted to one side of the tree. The 'winter' view gives a much clearer sense of the scale and bulk of the proposals.

C.3.5 One of the three large trees on the northern bank of the Tames to the left-hand side of the view was recently felled.

View 10- Photomontage P3 Caversham Bridge.

C.3.6 The selected viewpoint is towards the northern end of the bridge, away from the centre point or crown. This is the area of the bridge from which the Appeal Site is least visible and therefore least representative. It unremarkable that the assessed degree of intrusion into the selected view is low. It is remarkable that the Appellant's assessment of the effects of the development are so positive.

11. Thames Path at Caversham Wharf

C.3.7 This has been selected instead of the far more significant views from the southern towpath near to and in from of the appeal site and from the north bank and footpath level.

12. Lynmouth Road (see also Site Appraisal Photograph B)

C.3.8 I disagree with this characterisation entirely.

13. Vastern Road in vicinity of De Montfort Road Photomontage 4

C.3.9 This fails to reference the locally listed building.

C3.10 The text refers to 'existing utilitarian townscape of the Site, which forms a void in the urban grain and is a negative influence on character.'

14. Vastern Road in vicinity of Clearwater Court Photomontage 5

C.3.11 Once again this refers to existing utilitarian townscape of the Site, which forms a void in the urban grain and is a negative influence on character.

C.4 Cumulative impact

C.4.1 The Appellant submitted Townscape and Visual Impact Assessment Addendum was prepared on behalf of Berkeley Homes (Oxford and Chiltern) Ltd May 2020. This considered the cumulative impact of various surrounding proposed schemes. These were incorporated into the photomontages (shown in Appendix 3 of the TVIA) and the impact assessed in the Addendum Report.

SSE site

C.4.2 Section 7.6 of GLVIA3 confirms there are different interpretations of what should be included in a cumulative effects assessment. I am also mindful that Section 1.2 of the report confirms that cumulative schemes to be considered were agreed with the Council but did not include the future development of the remainder of the SSE site. There is therefore no assessment of the future development of the remainder of the Allocated Site. Notwithstanding, in my view the findings and conclusions in the TVIA Addendum are undermined by this omission. This also reinforces RfR 6 in indicating that a comprehensive approach has not been taken to the Allocated Site as a whole.

Height and massing

C.4.3 In the commentary on cumulative visual effects (section 2.2) it states:

As set out in the TVIA, in combination with the Proposed Development, the cumulative schemes, including as shown in the photomontages in ***Appendix A1****, provide the perception in views from the surrounding area of a strong sense of place associated with the evolving town centre. They are part of a marked intensification of the area, planned by RBC, including an increased perception of height which will fundamentally and positively reinforce the legibility of the centre of Reading as a regionally-significant hub, as required by RBC planning documents.*

C.4.4 This statement is misleading. There is no Reading planning policy document that supports an increased perception of height for the Appeal site. Policy indicates the opposite. The Appeal site is specifically excluded from the proposed tall building cluster, whilst the RSAF indicates much lower building heights than the Appellant proposes.

C.4.5 The TVIA further claims (section 2.3) *'the Proposed Development complements, but remains subservient to, these taller buildings which are located in Tall Buildings Clusters, notably the station area to the south'*. The Appeal proposals are only two storeys lower the tall building cluster heights within the cluster on the south side of Vastern Road. The 'clear hierarchy between the Proposed Development and the larger RSP proposals' that the TVIA refers to will not be evident from the river corridor and locations further to the north-east. Contrary to the Appellant's claim, this is clear in the TVIA figure 'View P2 Summer - Christchurch Meadows, approach to Christchurch Bridge, looking south-west - proposed'. I see

that the appeal proposals, viewed from the meadows, will seem to rise to similar heights as the proposed buildings to the south on the RSP site. In this context, it is also important to refer to the strategy set out in the RSAF for landmark buildings as an exception to general heights- the two taller building outlines shown in 'View P2' correspond with plots N6 and N8 in Figure 6.9 Scale/height guidelines (page 37).

C.4.6 The Appellant's claim at 2.2 of the TVIA addendum, that the Appeal scheme accords with a 'marked intensification of the area is planned by RBC' and 'an increased perception of height' are 'required by RBC planning documents' is not correct.

C.4.7 Section 2.4 states:

'This legibility would include the progression between smaller-scale built form at the riverside within the Proposed Development, to the taller built forms nearer to the urban centre to the south.'

C.4.8 The Appeal scheme cannot be correctly characterised as 'smaller-scale built form'. As noted above, it is a few storeys lower than the benchmark heights within the tall building cluster to the south. The TVIA analysis is drawing upon the comparative height of tall buildings within a tall building cluster in an adjacent and separate policy unit, whilst disregarding the smaller-scale built form to the east and west of the Appeal side and the medium-scale heights indicated in the RSAF.

9.4.9 The TVIA draws upon the concept of a hierarchy of heights (section 2.9)

'the relationship of the Proposed Development with these schemes would remain subservient and a logical and harmonious hierarchy of scale would be presented, in accordance with planning documents which are guiding the wider evolution of Reading town centre. '

C.4.10 This again mischaracterises policy and guidance. The Appeal scheme will not be subservient to adjacent proposed developments. Proposed Block D on the riversides is 10 storeys (plus roof top plant) and only one storey lower than the proposed Block B facing Vastern Road, Block B at 11 storeys. This is only a few meters lower that buildings on the south side of Vastern Road. I see no 'subservience'. I see no *'harmonius*

hierarchy'. Looking at the relative heights of the Lynmouth Road dwellings (protected in guidelines in the RSAF) , I see only discord.

C.4.11 The main effect the TVIA is trying to draw attention to is in the gaps between (rather than views over) the Appeal scheme Blocks. The TVIA ignores the future development of the remainder of the Allocated Site, so even these gaps are likely to be eroded by future development.

C.4.12 The commentary on cumulative character effects (para. 2.11)

The progression in scale increasing along Vastern Road from the north-west, in Plots B-D of RSP, culminates at the point where the tallest elements in the Proposed Development signal the Green Link to the river and correspondingly, the tallest elements in RSP signal the Green Link to the station. This arrangement of massing adds a further dimension to the townscape legibility of the Proposed Development and of the Green Link which passes through it and through RSP.