

Land at 55 Vastern Road, Reading:  
Rebuttal Proof of Evidence on  
Townscape and Visual Matters  
of Patrick H. Clark BA, MA Lsc. Arch., CMLI

Application Reference: 200188/FUL

Appeal Reference: APP/E0345/W/21/3276463L

Prepared on behalf of Berkeley Homes (Oxford and Chiltern) Ltd

October 2021



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**Reading Townscape Corridor Photographs 1-10, including Figure PC-R-1 (separate file - extracts included within text below, not to scale)**

**Figure PC-R-2: Aerial view of Reading town centre, looking north**

**Figure PC-R-3: Aerial View of eastern part of RTBS Character Area 12, looking east**



## 1.0 INTRODUCTION

- 1.1 My name is Patrick Harvey Clark and I am an Associate Landscape Planner in the specialist Landscape Planning and Design group of Barton Willmore LLP Chartered Architects, Town Planners and Environmental Consultants (BW). I work on landscape and townscape projects throughout the United Kingdom.
- 1.2 I hold a Master of Arts in Landscape Architecture from the University of Greenwich. I am a Chartered Member of the Landscape Institute.
- 1.3 I have over 12 years' professional experience in landscape planning and design. I have provided professional advice in relation to a wide variety of developments throughout the UK in the form of landscape and townscape and visual impact assessment; and strategic landscape design. These developments include both small and strategic-scale residential, commercial, industrial, infrastructure, power generation and transport schemes for local authorities, public and private companies. I have dealt with sites within and adjoining Areas of Outstanding Natural Beauty, National Parks, Green Belt and local landscape designations.
- 1.4 I have set out below responses to two aspects of the Proof of Evidence of Michael Doyle, acting on behalf of the Council. I do not comment here on other matters contained within Mr Doyle's Proof of Evidence, but the lack of comment should not be construed as I or the appellant agreeing with its content.
- 1.5 I include below extracts of photographs taken on additional survey work in October 2021, to illustrate the current character of townscape corridors in central Reading. These are set out at-scale on A3 sheets as **Reading Townscape Corridor Photographs 1-10**.

## 2.0 NATURE OF VIEW CORRIDORS IN READING TOWN CENTRE

2.1 In paragraph 3.3.25 of his evidence, Mr Doyle claims that the '*distorted grid*' structure of Reading has '*remarkably long sight lines*' and that '*the strategy for Central Reading is to replicate the qualities of this efficient, open grid morphology to the north of the railway (LP CR2a)*'.

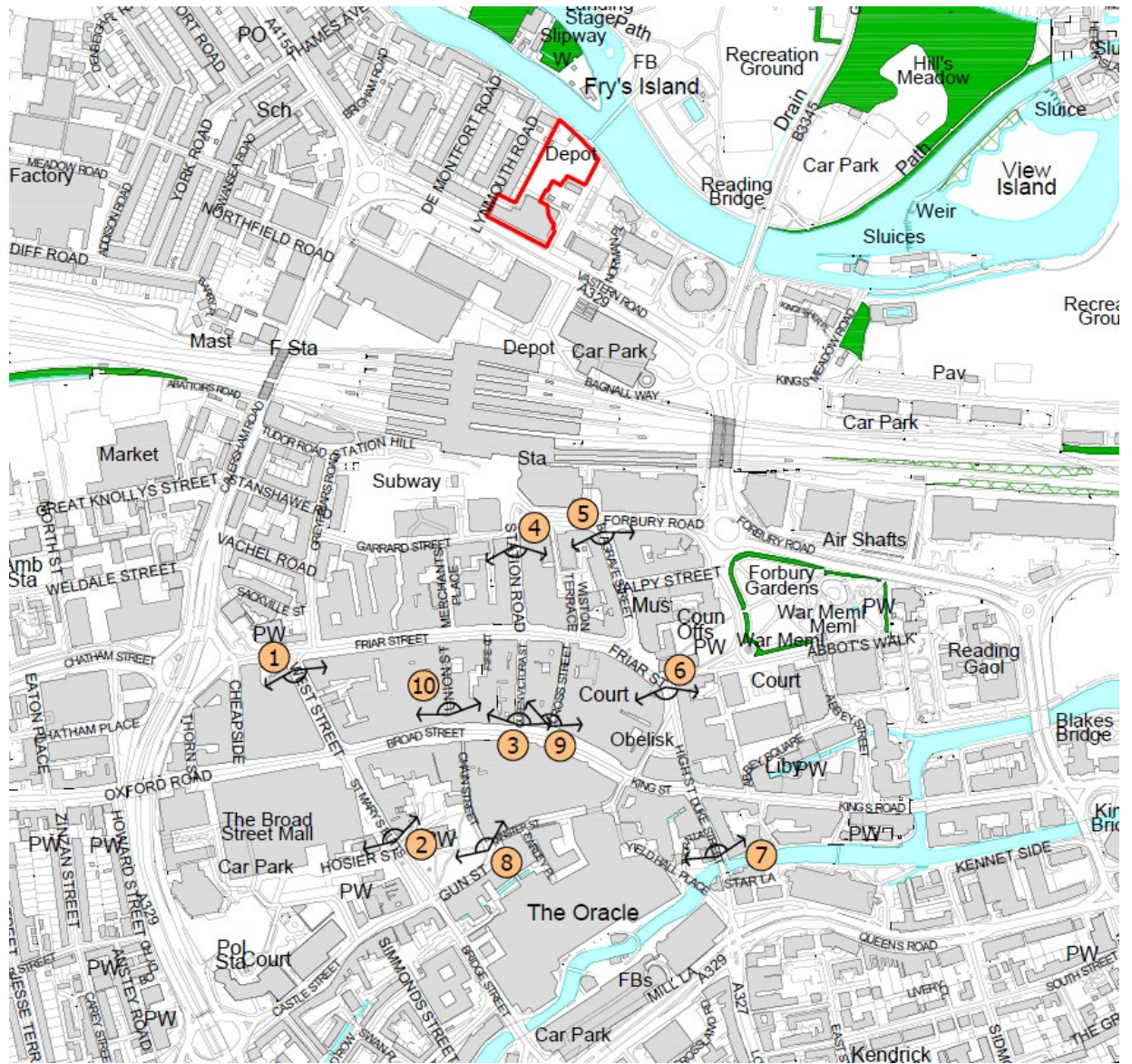
### Street pattern of Reading town centre

2.2 As set out in paragraph 7.21 of my Statement of Case (May 2021), I note that Reading's historic town centre has few long, straight axial view corridors. I would agree with Mr Doyle's term '*distorted*' to describe the townscape pattern of central Reading today. However, with reference to **Figure PC-R-1** and **Figure PC-R-2** (which shows the townscape in three dimensions), I consider that any perception of a grid pattern is in fact *highly* distorted, owing to a range of factors:

- The curving alignment of the River Kennet and Kennet and Avon Canal.
- The curving alignments of the historic routes highlighted in my Statement of Case, including Friar Street, Broad Street, Minster Street, High Street and Buttermarket; as well as others including Castle Street, Gun Street, Chain Street and Abbey Street.
- The staggered alignment of streets, for example: Greyfriars Road and West Street; Union Street; Chain Street; Cross Street; Abbey Square; Abbey Street; Merchant's Place; Minster Street (in relation to Market Place to the north-east); Wiston Terrace; Garrard Street (in relation to Stanshawe Road and Vachel Road to the west and to Forbury Road to the east); Abbatoirs Road; Tudor Road; a series of terraces west of the IDR including Eaton Place, Zinzan Street, Howard Street and Ansty Road; and Swansea Road and Brigham Road (to the west of the Appeal Site).
- The east-west alignment of the mainline railway.
- The north-west – south-east alignment of the River Thames.
- The varied alignments of the Internal Distributor Road, amid these features.



**Extract of Figure PC-R-1: plan of central Reading (not to scale)**



**Figure PC-R-2: Aerial view of Reading town centre, looking north:**

(GoogleEarth, 2021)

- 2.3 As a result of the above factors and as can be seen from these images, whilst there are some areas of broadly parallel streets, these areas are very limited in their extents and where present, are typically not aligned to the pattern of adjoining areas. Therefore, I do not consider that the town centre of Reading, including the Appeal Site, is characterised by a coherent grid pattern. I note that the Reading Tall Building Strategy (RTBS) (CD 6.22), including a detailed character assessment of the town centre in Appendix 1, makes no reference at all to the concept of a 'grid'.

#### **Visual corridors within Reading town centre**

- 2.4 Furthermore, I note from additional survey work undertaken in October 2021, that even where streets are broadly parallel, street corridors are frequently slightly curved or cranked, or are partially enclosed. This includes along the corridors that Mr Doyle mentions in his paragraph 3.3.25:

- **West Street/St Mary Butts**, which is slightly cranked south of the junction with Broad Street, enclosed by built form north of Friar Street to the north and partially enclosed by built form on Castle Street to the south (see **Reading Townscape Corridor Photographs 1-2**, extracts below). A framed view south-east is obtained along Bridge Street from the crank in alignment at the southern extent of St Mary's Butts.

**Extract of Reading Townscape Corridor Photograph 1: West Street, looking south-east:**



**Extract of Reading Townscape Corridor Photograph 2: St Mary's Butt's, looking north-west:**



- **Station Road/Queen Victoria Street**, which is slightly cranked at the Friar Street junction and robustly enclosed at either end:

**Extract of Reading Townscape Corridor Photograph 3: Queen Victoria Street, looking north:**



**Extract of Reading Townscape Corridor Photograph 4: Station Road, looking south:**



- **Blagrove Street/Market Place/Duke Street**, which is cranked at the King Street junction and at Town Hall Square; and enclosed by St Laurence's Church and the town hall in views north and south, respectively:

**Extract of Reading Townscape Corridor Photograph 5: Blagrove Street, looking south:**



**Extract of Reading Townscape Corridor Photograph 6: High Street, looking south:**



**Extract of Reading Townscape Corridor Photograph 7: Duke Street, looking north:**



2.5 The smaller streets and alleyways in between these corridors that Mr Doyle also refers to are also subject to curved alignments and robust enclosure by built forms, for example:

**Extract of Reading Townscape Corridor Photograph 8: Chain Street, looking north:**



**Extract of Reading Townscape Corridor Photograph 9: Cross Street, looking north:**





**Extract of Reading Townscape Corridor Photograph 10: Union Street, looking north:**



- 2.6 These corridors, highlighted by Mr Doyle to demonstrate the grid pattern of the town centre, in fact demonstrate that the directness of visual links across the townscape of Reading town centre is notably broken up by variations in alignment and enclosure by built forms. I acknowledge that there are longer views along the West Street/St Mary's Butts corridor which further extends at a cranked angle into Bridge Street but, even these are not from one end of the corridor to the other. Moving north towards the Appeal Site, the raised railway corridor severs the townscape pattern and inevitably contains onward views. On the basis, Reading town centre is *not*, as Mr Doyle suggests, somewhere where there are '*remarkably long sight lines*'.

**Summary**

- 2.7 Therefore, I do not consider that Mr Doyle's descriptions of the pattern of the town centre and the visual links within it are accurate or substantiated by the reality on the ground.
- 2.8 As a result of the distorted pattern, I note that often the cross-town links are not continuous and therefore as 'efficient' as Mr Doyle suggests. In fact, it is characteristic of the town centre of Reading that there is intimacy, visual interest and distinctive character in the sense of enclosure and the unfolding and varying townscape when moving along these corridors.

The longer, broader and straighter axial routes such as Bridge Street, Vastern Road and Caversham Road, however 'efficient' they may be in terms of movement (primarily that of motor vehicles), lack this distinctive visual interest. I consider that the design of the green link through the Proposed Development reflects the intimacy, visual interest and character distinctive to the town centre; and that a longer, more direct visual link through the Proposed Development is not needed or characteristic of the town centre. I finally note that in referring to the 'grid' of central Reading, Policy CR2 makes no reference at all to the 'efficiency' of the pattern as Mr Doyle suggests, but instead refers to a range of aspects of streetscene design to provide interest and diversity.

### **3.0 RESPONSE TO MR DOYLE'S COMMENTARY ON TVIA**

3.1 Mr Doyle provides a critique of the submitted Townscape and Visual Impact Assessment (TVIA) in his Appendix C. I note my responses to this below. I first note that Mr Doyle has provided no assessment of townscape or visual impact of his own and he has provided no methodology for his own assertions of impact.

#### **TVIA Process**

3.2 Mr Doyle notes in paragraph C.2.1 that there are missed steps in the TVIA. I reject this entirely. In short, the TVIA follows a methodology and approach that has been used by Barton Willmore over many years and has been proven to be robust in relation to many different development scenarios.

3.3 In this respect, Mr Doyle first notes his view that there should have been an assessment of an alternative approaches to the riverside frontage including one based on the RSAF guidance on height and massing. As I have set out in my Proof of Evidence, the submitted proposal was the result of a lengthy, iterative and consultative design process, refining the design approach to account for a wide range of considerations. The TVIA assessed the final proposal, as is entirely standard practice (typically any planning submission in any technical discipline includes assessment of the final proposal rather than any alternatives which are not part of the submitted proposal). As set out in table 3.1 of GLVIA3 (CD 6.29), which sets out 'Components of the EIA process and role of LVIA', under 'consideration of alternatives' the document notes that 'it is acceptable if there are none'. Given that it was not deemed necessary for the impact assessment of the Proposed Development to follow the requirements of the EIA process, the requirement for assessment of alternatives is of even less relevance. I consider that Mr Doyle's assertion in this respect is misplaced.

3.4 In relation to Mr Doyle's comments in relation to other aspects of the role of LVIA from table 3.1 of GLVIA3:

- The project description (i.e. the nature of the Proposed Development) is set out in the submitted design package, referred to from paragraph 5.2 of the TVIA; and summarised in paragraph 5.4 of the TVIA. The nature of changes arising from that is described through the rest of section 5 of the TVIA. This includes the consideration of mitigation approaches (i.e. townscape and visual mitigation embedded into the Proposed Development as a result of the iterative design process).
- Baseline studies are set out in sections 2-4 of the TVIA.

- Identification and description of effects, as well as assessment of their significance is set out in section 6 of the TVIA. The assessment of visual effects is based on detailed analysis in TVIA Appendix 4.

3.5 I therefore consider Mr Doyle's suggestion that the TVIA somehow diverges from GLVIA3 good practice to be entirely unjustified.

### **Assessment of Significance of Effects**

3.6 Mr Doyle notes in paragraph C.2.10 that *'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.'* As set out above, TVIA section 6 and TVIA Appendix 4 set out in detail exactly what the significance of effects is considered to be for townscape and visual receptors; and how these conclusions were reached. Mr Doyle's assertion is untrue.

### **Reading Tall Buildings Strategy commentary on sensitivity to tall buildings**

3.7 Contrary to Mr Doyle's paragraph C.2.11, the TVIA clearly includes under paragraph 2.24 the commentary from the RTBS that states that the sensitivity of the townscape to the inclusion of tall buildings is:

***'Low: The large block size which exists within the character area and the absence of any key views or visual focal point makes this an appropriate location for tall buildings. 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.'***

3.8 As the TVIA acknowledges at paragraphs 6.34-6.37, the western boundary of the Appeal Site adjoins a 'smaller-scale of residential properties' and a considered approach to mitigating the effect of taller buildings has been used, including lower building heights to provide as progression in scale, among other measures. Furthermore, taller structures are proposed to the south of the Appeal Site, adjacent to the railway line.

3.9 In relation to Character Area 12, the TVIA does not, as Mr Doyle alleges in his paragraphs C.2.16 and 17, *'rely on... distant and relatively low-rise examples [of larger-scale built form within CA12] as a basis to set aside the RTBS assessment.'* The TVIA agrees in paragraph 2.31 that there would be a high sensitivity within Character Area 12 to tall buildings but notes that in relation to the Appeal Site, which lies outside CA22:

***'...sensitivity to larger scale development in the area occupied by the Site would be lower due to the existing presence of larger built elements at key locations within the CA.'***

3.10 Mr Doyle mis-represents the TVIA in this respect.

3.11 For ease of reference, this aerial view demonstrates the scale of development at Great Brigham's Mead in the foreground; and along the waterfront further to the left. These features lie to the north-west of the two streets of Victorian terraces at Lynmouth Road and De Montfort Road, beyond which lies the Appeal Site.

**Figure PC-R-3: Aerial View of eastern part of RTBS Character Area 12, looking east**



(GoogleEarth, 2021)

### **Impacts on heritage asset**

3.12 Mr Doyle's paragraphs C.2.20 and C.2.21 note that the LVIA [sic] should *'assess the significance of the heritage asset, the impacts of its loss, or the merits of an alternative scheme that retains the building.'*

3.13 The assessment of heritage impacts does not fall within the scope of TVIA, it being a specialist analysis to be dealt with by qualified heritage consultants. Mr Doyle misunderstands the scope of TVIA. The evidence of Mr Weeks relates to heritage impacts.

### **Cumulative Assessment**

3.14 In paragraph 3.2.22 and C.4.2 Mr Doyle notes the lack of cumulative assessment of the remainder of the Allocated Site. At the time of preparation of the TVIA there was no proposal

to develop the retained SSE sub-station and this remains the case. There cannot therefore be any assessment of cumulative effects in relation to this land. The Council did not request this as one of the cumulative schemes prior to submission of the application or prior to the TVIA addendum on cumulative schemes; or indicate the lack of any such assessment after the submission of the application.

### **Identification of Visual Receptors**

3.15 Contrary to Mr Doyle's paragraphs C.224-C.2.26, the visual receptors he identifies have been considered in the TVIA, Appendix 4, as follows:

- Lynmouth Road residents, including views from properties: Visual Receptor 12
- Walkers using the southern Thames Path: Visual Receptor 11 (pedestrians) and, from directly in front of the Appeal Site, represented by Visual Receptor 6 (pedestrians) on Christchurch Bridge, which is representative of the change in views to be experienced from the Thames Path adjoining the Appeal Site.
- Walkers using the path on the northern side of the Thames: represented by Visual Receptors 6, 7, 8 and 9 (all pedestrians) as well as the more elevated view obtained by Visual Receptor 17 (pedestrian) at Reading Bridge.

3.16 The TVIA does not assess views from the 'receptor' of the locally listed building as Mr Doyle suggests it should have, because it is a heritage asset (as set out above), not a visual receptor, which must be a person.

3.17 The TVIA identifies potential visual receptors and provides a representative photograph to illustrate the views they obtain of the Appeal Site. Receptors and their associated views are identified from 28 different locations. Mr Doyle is entirely inaccurate in claiming in paragraph C.2.23 that '*the LVIA [sic] does not undertake a systematic assessment of potential visual receptors*'. All of these representative viewpoints for visual receptors were agreed by the Council prior to the preparation of the TVIA, as set out in the Statement of Common Ground paragraph 7.17 and in paragraphs 3.87 and 3.88 of my Proof of Evidence.

3.18 In section C.3, Mr Doyle considers the views obtained from the viewpoints used for the assessment of visual effects. Mr Doyle has made no attempt to describe the visual baseline or provide any kind of analytical assessment of visual effects based on a methodology or any other aspect of good practice set out in GLVIA3. He makes a series of unsubstantiated assertions.

3.19 As a point of clarification, as Mr Doyle expresses his concern in paragraph C.3.6 that the location of the photograph view from Caversham Bridge is 'the least representative', the location is that of the photograph used for mid-range view 6 of the RTBS and therefore,

following the Council's identification of the most appropriate viewpoint. The assessment of visual effects for pedestrians at this location transparently details what would be seen in the view.

### **Summary**

3.20 In summary, in relation to the proper processes for robust assessment of townscape and visual effects, I consider that Mr Doyle misrepresents the TVIA methodology and content; wrongly suggests that the TVIA is not compliant with established principles of good practice as set out in GLVIA3; fails to identify that the TVIA includes detailed assessment of the landscape and visual effects of the Proposed Development; fails to understand that the assessment of heritage impacts is a separate exercise to TVIA and that a heritage asset cannot be a 'visual receptor'; wrongly considers that the retained SSE substation should be part of a cumulative assessment; fails to identify that representative locations for a comprehensive assessment of visual receptors have been included in the TVIA, based on an agreement of such locations with the Council; and, despite suggesting a range of (misplaced) criticisms of the TVIA, makes no attempt to use any kind of systematic, comprehensive and detailed methodology for the assessment of townscape and visual impacts himself.