

55 Vastern Road, Reading

# Rebuttal Proof

Design

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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

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for  
**Reading Borough  
Council**

**October 2021**

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# 1 Introduction

## 1.1 Scope of rebuttal

1.1.1 I address the following areas of the Appellant's Proofs Evidence (PoE).

1.1.2 Chapter 2 sets out rebuttal evidence in response to the 'Townscape and Visual Matters' Proof of Evidence (PoE) by Patrick H. Clark ('Mr Clark') *September 2021*.

1.1.3 Chapter 3 sets out rebuttal evidence in response to the 'Design' PoE by Dave Taylor ('Mr Taylor').

1.1.4 Chapter 4 sets out rebuttal evidence in response to the 'Town Planning' PoE by Kim Cohen ('Mrs Cohen').

1.1.5 Chapter 5 sets out rebuttal evidence in response to the 'Proof of Evidence of Scott Witchalls' ('Mr Witchalls'), including his Appendices A-K.

1.1.6 The fact that a matter in the Appellant's relevant PoE is not specifically addressed should not be taken as an indication that it is accepted.

## 2 Townscape and Visual Matters

- 2.1.1 Proof of Evidence on Townscape and Visual Matters by Patrick H. Clark (*Mr. Clark*)  
*September 2021.*
- 2.2 **2.0 NATIONAL PLANNING POLICY FRAMEWORK (JULY 2021) (pages 2.3-2.6)**  
*Paragraph 2.3*
- 2.2.1 Mr Clark's PoE refers to the National Planning Policy Framework (NPPF) and the Building Better Building Beautiful Commission Report. He then outlines 'key ways' in which the Proposed Development responds positively in this respect.
- 2.2.2 I take issue with several bullets, including the fifth '*Reflecting in the north-south link the historic development of key routes through Reading*'. However, I first wish to question the basis of Mr Clark's list. The correct sources to draw on for a definition of beauty and a component part -locally distinctive character- are the NPPF, NDG, NMDC, the Local Plan<sup>1</sup> and RSAF<sup>2</sup>.
- 2.2.3 NMDC Guidance Notes on 'Identity' (page 42) confirms (1.18) the identity of place '*includes the way that it responds to the character of the local area*'. The earlier section

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*1 Local Plan CR2, Design in Central Reading, confirms development will build on and respect the existing grid layout structure. CC7- All development must be of high design quality that maintains and enhances the character and appearance. Development will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives, including 'Character - a place with its own identity and sense of place'. Developments should respond positively to their local context and create or reinforce local character and distinctiveness. EN6, new development in a historic context - When determining planning applications for new development, the factors to be taken into consideration include (a) The positive contribution of the development to the existing historic townscape, including (in brackets) 'street form', 'significant vistas and views', and 'open space'.*

*2 RSAF Chapter 2 refers to the (superseded) RCAAP Key Principles 9: 'Areas and features that positively contribute to the unique and historic character of central Reading will be protected and, where appropriate, enhanced'. This is developed on page 17 into one of a series of Station Area Principles including (para. 3.7) 'A Place to Value - The Station Area will contain buildings and development of outstanding architectural merit and design innovation, creating a unique sense of place which responds to the character of the historic town centre and adjoining residential areas'.*

- I.1.i (page 43) on Local Character confirms Historic England guidance sets out approaches to assessing the character of places, covered in more detail on page 4 (C1)<sup>3</sup>
- 2.2.4 Returning to Mr. Clark's list (para. 2.3), I note first that the Appellant relies upon a summation of the character and form of the wider town centre without the benefit of any broader town centre assessment in line with Historic England guidance, which leads to errors and mistaken assumptions.
- 2.2.5 Mr Clark's bullets are less an exposition of how the proposals 'reflect the history, character and identity of their community' and more a rationale for the Appeal Scheme. His second point justifies greater height based on planned change and his view that the site is 'worthy of substantial built form to mark this notable interface'.
- 2.2.6 I see no widespread evidence of taller buildings signposting bridging points of watercourses in Reading, as Mr Clark claims. There are several recent examples, which is perhaps what Mr Clark is referring to. However, the two oldest and historically most significant river crossings in Reading - Caversham Bridge and Duke Street - are characterised by low-rise buildings. The historic setting of the Duke Street Bridge is of particular note.
- 2.2.7 Mr Clark claims (fifth bullet) claims the north-south link reflects the historic development of key routes through Reading which, like many other successful routes through urban areas, do not rely on long, straight axial corridors but instead provide short and/or curving visual corridors, providing a sequence of focal points that invite progression along the route. I disagree with this characterisation, which contradicts the principle of extending the historic grid of the central area to the river set out in policy and guidance. Figure 15 shows what is meant by the grid.

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*3 Character Studies: "Character includes all of the elements that go to make a place, how it looks and feels, its geography and landscape, its noises and smells, activity, people and businesses. This character should be understood as a starting point for all development. Character can be understood at three levels; The area type in which the site sits, its surroundings and the features of the site'.*

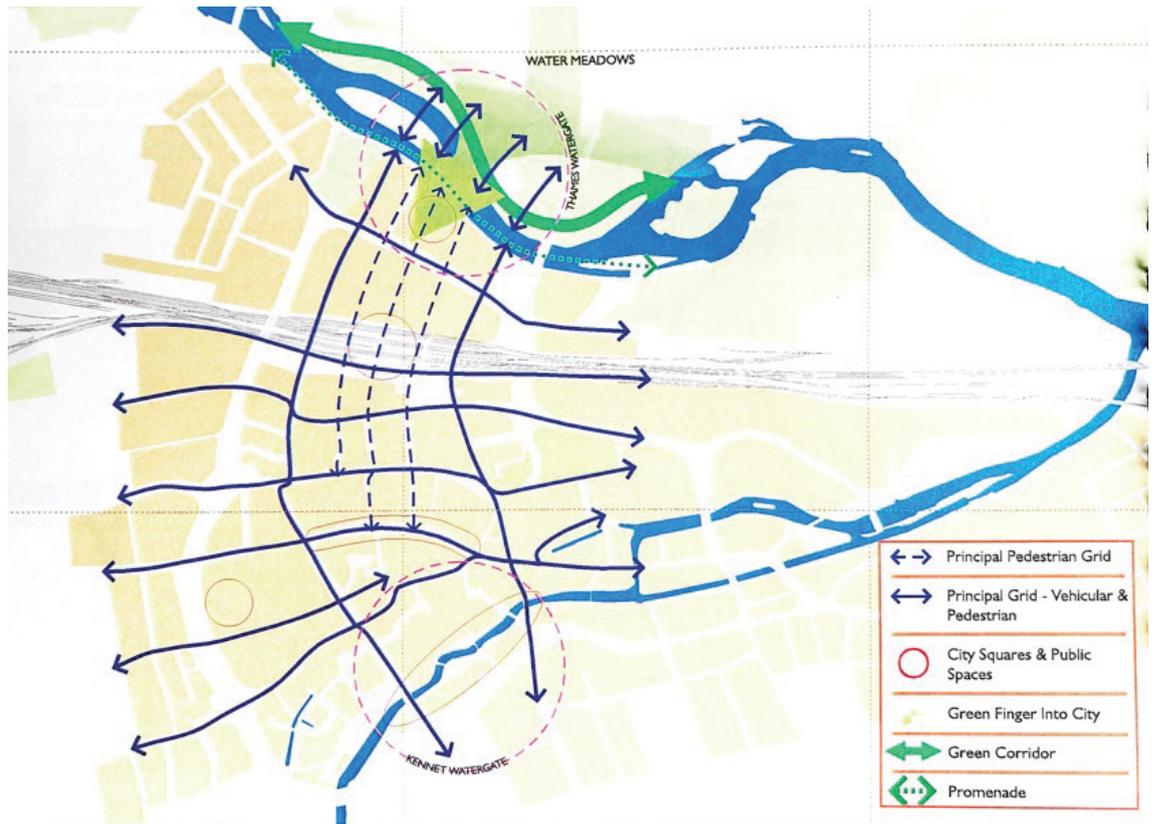


Figure 1 (Figure 23 from main proof) showing the Reading grid.

- 2.2.8 Mr Clark bases his characterisation of the historic development of key routes through Reading on his SoC Fig 15 (the map of Reading of 1611), attached again below for ease of reference. I have laid over this the emerging grid evident in the map of 1611 that was not substantially developed out until the 19<sup>th</sup> Century - including new routes driven through the medieval historic fabric such as Queen Victoria Street/ Station Road.
- 2.2.9 An example of Reading's 19<sup>th</sup> century grid right next to the Appeal Site at Lynmouth Road and De Montfort Road. In my main Proof (SoC 3.3.25)
- 2.2.10 I accept the grid is distorted, but do not accept the general urban morphology/space syntax is one of '*short and/or curving visual corridors, providing a sequence of focal points that invite progression along the route*'. The routes I have shown in orange are long and comparatively straight.

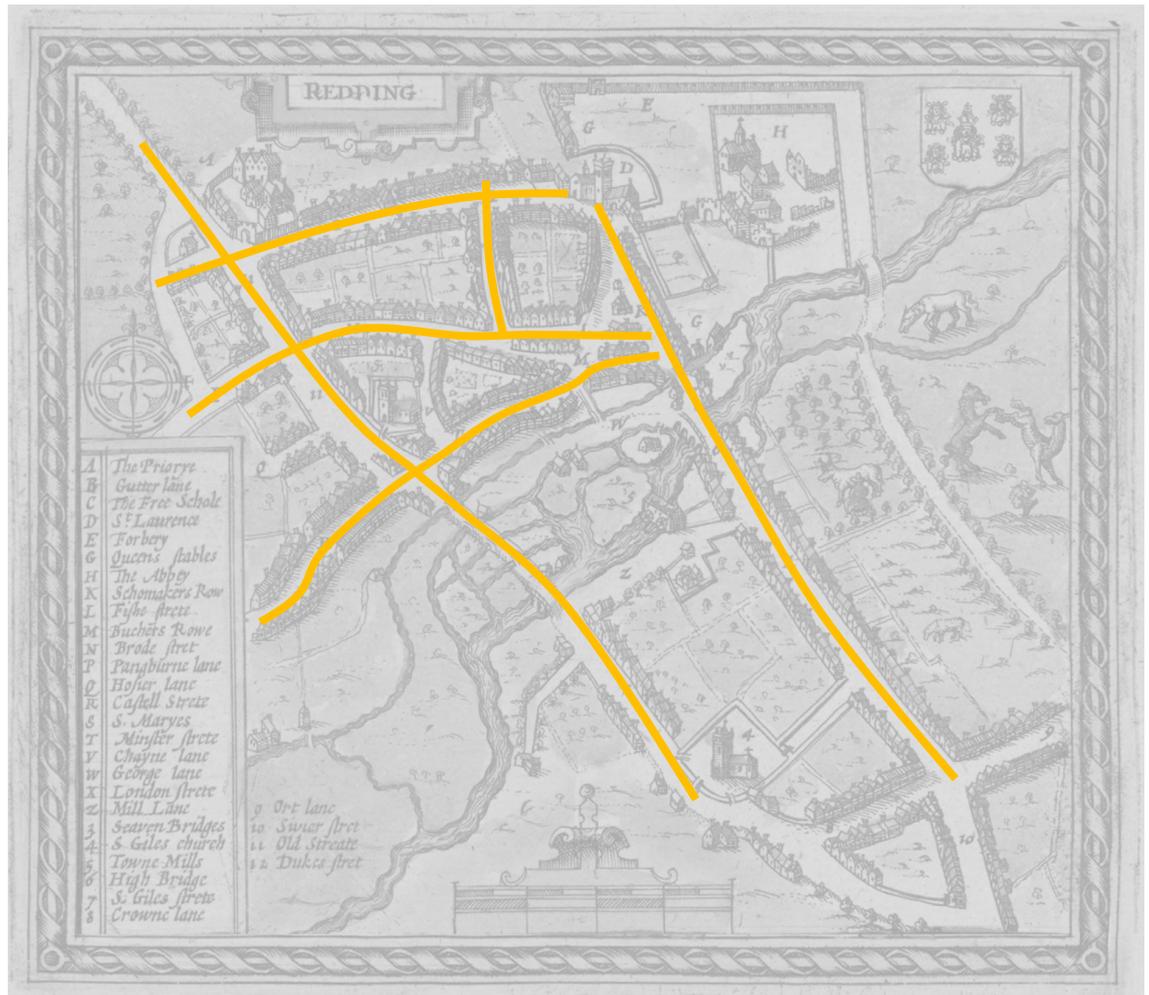


Figure 2 Mr Clark's Figure 15 with the emerging grid overlaid.

2.2.11 I have explained how the historic grid is distorted to some extent, from which Mr Clark draws the mistaken conclusion that the town centre is characterised by 'short and/or curving visual corridors. In any case, the Appeal Scheme does not propose curving visual corridors.

### 2.3 3.0 Response to Council's Statement of Case

#### Reason for Refusal 1 (paras. 3.2-3.5)

##### Paragraph 3.6

2.3.1 Mr Clark makes the point that RSAF paragraph 7.10 states that there should be an unbroken line of sight between the Station and the Thames, but that views 62 and 63 are unclear as to what the focal point should be. Mr Clark seems to suggest that without a defined 'focal point', there can be no clarity on what the RSAF intends.

2.3.2 The RSAF guidance on views does not include the concept of a 'focal point'. Paras. 7.8 and 7.9 characterise several types of view (panoramic views of the centre, direct views of the Station Area, local views of individual streets or spaces where buildings in the Station Area may form a backdrop, views where historic assets form part of the composition of the view, and new views being opened within the Station Area itself). The emphasis is on the view's origin, direction, composition, and characteristics, not a specific 'focal point'. Some views include a focal point, such as No.58 Station Road, which frames the historic Station Building and clock tower. However, this is only one characteristic and not the single defining characteristic of the view.

2.3.3 The origin and direction of the two new views Nos. 62 and 63 at RSAF Figure 7.2 are sufficiently defined without reference to a focal point. RSAF Paragraph 7.10 provides ample detail on their future composition and characteristics '*along the direct north-south link*', '*between the Station and the Thames*', where there should be an 'unbroken line of sight'.

#### *Paragraph 3.7*

2.3.4 Once again, it is implied that the drafting of the Local Plan recognised difficulties in providing direct visual links in the period since RSAF adoption, hence the wording '*If visual links are also provided ...*' in paragraph 5.4.6 of the Local Plan. This is inaccurate. The only change that makes it more challenging to achieve these visual links is the retention of the SSE equipment. During Local Plan drafting, it was not known that the equipment would be retained (SSE previously indicated development of the entire site would come forward), so there would be no reason to reconsider the RSAF position on visual links. This wording was directly carried across from the Reading Central Area Action Plan (RCAAP) adopted in January 2009, preceding the RSAF<sup>4</sup>.

2.3.5 The wording '*If visual links...*' is not intended to mean that visual links are optional – instead, it is a description of the reasons for the importance of the north-south links in the policy. A reading of paragraph 5.4.6 in total makes it clear that the wording is in the context of improving permeability for pedestrians and cyclists throughout the centre

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<sup>4</sup> Paragraph 6.11 of the RCAAP stated, '*If visual links are also provided, this will help change the perception of the area north of the station as a separate entity.*'

and Major Opportunity Area, particularly in a north-south direction. This refers to the whole north-south axis, including areas south of the station where achieving a full visual link along the entire route is impossible because the station terminates views from the south and the link includes the underpass. The wording refers to the link in totality and is not specific to the area between the Station and Thames.

*Paragraphs 3.11 -3.16*

2.3.6 Mr Clark (paras. 3.11-3.14) is suggesting I am confused about the requirements for the view from the Station square to the riverside (View 62) and from the new public space on the Thames looking south (View 63). Once again, he engages us with his concept of the 'focal point'.

2.3.7 I consider framing views towards Christchurch Bridge at the earliest opportunity on entering the site is important and RSAF 7.10 generally envisages new views being opened within the Station Area. However, this should not detract from the requirement for a clear view through to the Thames from the Station as with the Views 62 and 63: They are not mutually exclusive. In any case, my evidence is that the Appeal scheme does neither.

*Paragraph 3.17*

2.3.8 I do not consider that there is any confusion about the visual links within the Council or in the interpretation of policy and guidance. They should be between the Station and the river. This is clear from paragraph 7.10 of the RSAF. There are no other provisions within the policy that would contradict this.

2.3.9 The LPA has sought to be pragmatic in considering views as direct as seems practicable and reasonable, but this does not contradict the policy. In any case, the Appellant has not even managed to achieve a direct visual link from Vastern Road to the river.

*Feasibility of direct visual link (heading with no associated text by Mr Clark)*

*Visual link to the River Thames (3.18-3.23)*

*Paragraph 3.18, 3.23*

2.3.10 Here, and at various other points within the PoE, the implication seems to be that if level changes mean that you cannot physically see the water of the Thames, the policy

loses relevance. This rehearsal of Mr Clark's concept of the 'focal point' does not follow policy and guidance.

- 2.3.11 Mr Taylor's Design PoE at paragraph 3.7 refers to '*markers of legibility*' that '*rise above the horizon*', which would indeed include the riverside. In this location, there is planting on the tip of Frys Island and willow trees on the north bank of the Island, which serve this purpose. If you can see an island in the Thames, it must be true that you have a view to the Thames.



Figure 3 Enlargement of Figure 17 from Main Proof

- 2.3.12 My Figure 17 (main proof), enlarged in Figure 1 above, shows a direct line of sight from the south side of Vastern Road along De Montfort Road to the River. In this view (a narrower section of the River), it is possible to see Fry's Island and its mature trees and boats moored on the River. Passing craft will also be visible. A small proportion of the surface of the river is just visible near the opposite bank. The spatial and landscape qualities and features of the river are visible. It is essential to note that the River is narrower (around 34m)- almost half as narrow as the 64m opposite the Appeal Site.

- 2.3.13 My PoE Figure 26 shows it is possible to create a direct line of sight from the Station concourse and escalators to the River's surface. The Station and subway entrances are raised three steps (approximately 0.6m - 38.6AOD) above the level of the Station square, which will compensate for some of the changes in levels between the Station and the River that Mr Clark suggests impede the view.
- 2.3.14 The AOD height of the Thames is typically 36.8-37.0 AOD<sup>5</sup>. The Appellant's updated topographical survey confirms the riverbank height is typically 37.4m AOD. The survey gives a typical height at the Vastern Road Frontage, 136m from the river edge, of 37.70 AOD (0.39m higher than the riverside path). The northern Station entrance level, 306m from the river edge (raised above the general level of the square in front), is 38.6AOD<sup>6</sup> (1.2 m higher than the riverside path).
- 2.3.15 Taking the figures above, a view towards the river from Vastern Road 1.8m above pavement level (excluding Appeal Site levels) would permit a view of the surface of the water across over approximately one-third of the width of the river where it is 30m wide (the channel beside Fry's island) and two thirds where the river is 60m wide (half). From a viewpoint 1.8m above the raised station level towards the river, there would be no view of the water surface where the river is 30m wide, but one-third of the surface will be visible where the river is 60m wide.
- 2.3.16 The calculations above do not account for the Appeal Site levels. However, they demonstrate it is possible to open ground-level views of the water surface some distance south of the riverbank.
- 2.3.17 Mr Clark's 3.22 (and Mr Taylor's figure 3.5) asserts that any potential view would be set away from the 'nodes' of the station entrance doors, the subway entrance and Christchurch Bridge pier. Mr Clark takes a selective approach to nodes. He fails to recognise that the Station Square, the northern interchange, the entire northern station entrance building (including the concourse/overbridge), the river, the southern towpath, and Fry's Island are all 'nodes'. He takes no account for the fact that the

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<sup>5</sup> River Levels UK

<sup>6</sup> Network Rail Final Construction Drawing 'North entrance North and South Elevations' Ref. RSS1D-EAR-DRG-CSB-091411 Rev C 16/7/2010.

pattern of development of the sites south of Vastern Road is not a fixed mark and are subject to change and adaptation.

[Visual link to Christchurch Bridge \(3.24-3.25\)](#)

2.3.18 Christchurch Bridge is a visual representation of the river, the gateway to the meadows and an aid to connectivity. Visual links to and across the Bridge are therefore highly desirable but not required by RSAF guidance.

2.3.19 I take issue with Mr Clark's claim at para. 3.25 (based on Mr Taylor's evidence at 3.24-27) that '*the appeal scheme represents the fewest number of changes in a user's view between the station and ... the mast*'. It is desirable to create a well-framed view of the bridge through the Appeal Scheme (not merely the mast) at the earliest opportunity when travelling from the station- and for that route to be as direct as possible. That is not qualitatively the same as '*the fewest number of changes*', which is less difficult to achieve and may not result in the highest quality approach. The Appeal Scheme offers only a partial view of the mast, around a bend in the route, after travelling though most of the Site. The view is occluded by ramps, railings, a café and buildings.

2.3.20 The Illustration on Page 77 of the DAS shows the first glimpse of the Mast. This only appears after travelling through two-thirds of the Site. Blocks and F and G, on the left-hand side, appear well proportioned to the scale of the mast, Block C on the right less so. The upper storeys of Block E begin to indicate the shift in height at the riverside that, in my view, is inappropriate. The mast is framed in views along the route but cannot be said to be exceptionally prominent and partly occluded by the rising ramp levels, railings, and trees.

[Visual link to riverside public realm \(3.26\)](#)

2.3.21 I disagree with Mr Clark's claim that the riverside open space cannot be adjacent to the bridge (which is not required by policy or guidance) whilst also visible from the Station. My PoE Figure 34 shows the riverside open space adjacent to the bridge and visible from the station square.

[Visual link to surrounding greenery \(3.27\)](#)

2.3.22 This refers to the Design PoE figure 3.5 and 3.6 as demonstrating that a visual link to 'surrounding greenery' cannot be achieved. The figures attempt to show that visual

links to the 'riverside' cannot be achieved, not the much larger 'surrounding greenery', which would include all of Christchurch Meadows.

- 2.3.23 I disagree with Mr Clark's claim that a direct visual link through the Appeal Site from Station Square to 'surrounding greenery' beyond cannot readily be achieved. My PoE Figure 34 shows the riverside open space adjacent to the bridge and visible from the station square. My PoE Figures 30, 31, 32, 34, 35, 36 show how this can be achieved.

*Visual link to Station (3.29)*

- 2.3.24 This refers to figures 3.5 and 3.6, showing that a visual link from the Thames to the station would not be possible other than over the top of the SSE equipment. I disagree that it would be impossible, as set out in my comments on those figures in the Design PoE (My PoE Figures 30, 31, 32, 34, 35, 36).

*Need for direct visual link (3.30-3.39)*

*Paragraph 3.30*

- 2.3.25 Mr Clark claims the sequential enclosure of sightlines is an entirely acceptable and well-established approach to providing an attractive and legible pedestrian route. This may be acceptable on another site, in a different context, and under a different set of local policies and guidelines, but it is entirely unacceptable here.
- 2.3.26 Mr Clark claims the sequential enclosure of sightlines is justified because it is impossible to create a direct route and direct line of sight on the Appeal Site. The LPA case is that a direct route is feasible, and I have demonstrated that in my evidence that a direct route and a direct line of site are possible (see Figure 4).

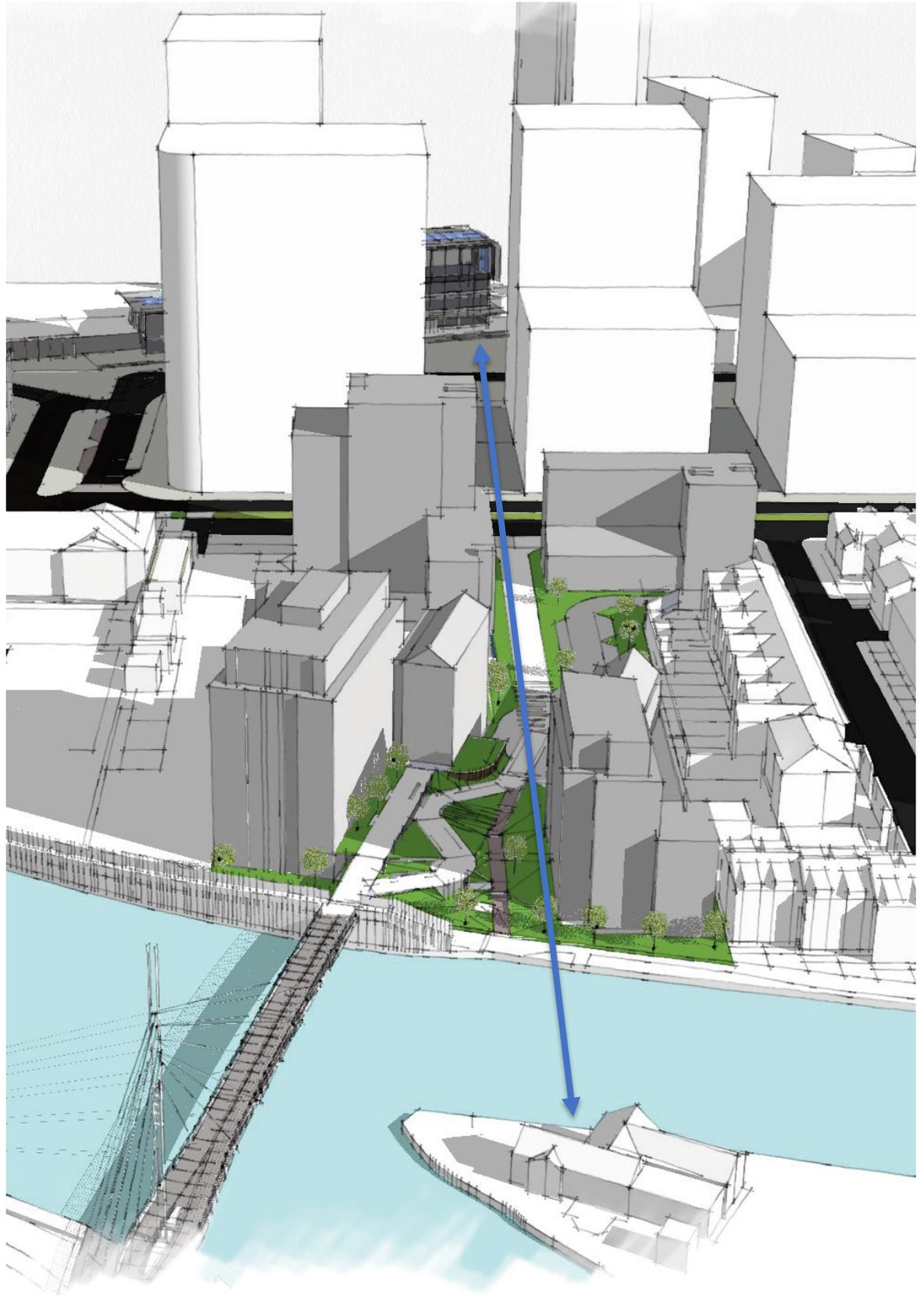


Figure 4 Extract from my PoE 34 showing one possible arrangement of a direct route and direct line of site (blue arrow).

*Paragraph 3.31*

2.3.27 The LPA disagrees that a visual link is simply 'one way of providing wayfinding' in the SoCG because it implies that the ways of wayfinding are of equal merit. The RSAF makes clear what is required and NDG paragraph 82- Active Travel offers full support:

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

2.3.28 Policy and guidance do not suggest that the approach can be varied where compensating wayfinding measures are offered. Wayfinding measures are of second-order importance to a form of development that is legible and easy to navigate.

*Paragraph 3.33 (the of purposes of a direct line of sight between station square and the river Thames)*

2.3.29 Mr Clark's para. 3.33-3.35 responds to the three purposes of the direct line of sight set out in my SoC para. 2.16.1 and why I say the Appeal Scheme fails to fulfil these purposes:

- Visually connects high-density residential development in the central area and the station area with riverside amenity space.
- Visual 'breaks' in the built urban fabric with views out to surrounding greenery
- Helping to break down the barrier of the IDR and Vastern Road

2.3.30 The explanation Mr Clark seeks as to why a direct visual link to Christchurch Meadows would be '*more attractive, feel simpler, less obstructed and safer*' lies at LP 5.4.6: '*If visual links are also provided, this will help change the perception of the area north of the station as a separate entity*'.

*Paragraph 3.34*

2.3.31 I am surprised at Mr Clarke's summation at para. 3.34 of a view along a direct line of sight for view 62 to the canopy of trees on Fry's Island and the northern bank of the river as '*simply providing a view to vegetation*'. I do not expect a Landscape Architect to set out to minimise landscape quality. In any case, depending upon the final horizontal and vertical alignment, the view would include the riverside willow trees, the landmark

(but low rise) white cottage (De Montfort House built 1897) at the bifurcation point of the River, moored boats and boats travelling along the River.

2.3.32 Mr Clark claims the Christchurch Bridge approach ramp and stairs obstruct any possible visual link to the riverside: This is incorrect. The bridge build-up and existing slatted bridge stairway balustrade will only block views terminating at the riverside towards the eastern half of the river frontage. My PoE Fig 30, 31, 34, and 34 demonstrate how the visual link can be aligned to avoid the stairway and ramp altogether.

*Paragraph 3.35*

2.3.33 Mr Clark's para. 3.35 responds to the third purpose of the direct line of sight set out in my SoC para. 2.16.1 - *'Helping to break down the barrier of the IDR and Vastern Road'*.

2.3.34 Mr Clark supports my claim that Vastern Road inhibits the development and growth of the central area (this simply accords with the LP and RSAF). However, I cannot agree with his claims the *'clear route of the public realm between the built form'* (along with hard surfacing, vegetation, and wayfinding) will provide sufficient visual clues to draw movement across Vastern Road.

2.3.35 There are already indirect pedestrian routes with direction signs from the station to the Thames, but they have not broken down the barrier of Vastern Road precisely because these routes are indirect and often tortuous. The Appeal Scheme will add another, indirect route with limited lines of sight and will not offer any greater incentive to cross the road than the existing condition- particularly because the Appeal Scheme will read as a private residential development form the south side of Vastern Road.

*Paragraph 3.36*

2.3.36 Mr Clark's regards an unbroken line of sight as effective only where a focal feature is readily visible at the end of the visual corridor. He draws on various examples. I agree this can be an appropriate urban design typology in some circumstances, but it is not the only means to invite progress along a route.

2.3.37 A visitor in the heart of an unfamiliar town centre who looked down a street to see boats sailing by would surely find the view magnetic. The sense that the intensity of the

central area suddenly gave way to swathes of green and blue would be enticing, even though this view was only a glimpse of a greater whole.

2.3.38 I note that the Appeal Scheme offers no grand urban design composition on a par with the examples Mr Clark cites. Views in the Appeal Scheme are terminated by blocks of flats sited and orientated to exploit private views over the river. These blocks of flats do not terminate grand, axial, and symmetrical compositions.

2.3.39 Suppose the Appeal Scheme included a Tate Modern, St Paul's Cathedral, the Arc de Triomphe, the Louvre Pyramid, Buckingham Palace/Victoria Memorial or Admiralty Arch. In that case, there might be a case for these important landmark buildings of internationally recognised architectural quality to terminate a view.

*Paragraph 3.37*

2.3.40 I agree with Mr Clark's observation that a flat river will not be **very** visible across a flat landscape at the end of a visual corridor (my emphasis). A boat sailing along the river will be. The river surface forms only one part of the view that will become increasingly visible and a more major component on approach. I consider this an attractive 'reveal', an invitation to travel down the route and far more powerful than wayfinding and signage measures.

2.3.41 My PoE Figures 34 and 36 demonstrate that views of the river surface are possible from the Station Concourse and Escalators.

**3.39**

2.3.42 The LPA responded pragmatically to the Appellant's claim that a direct visual link was impractical or impossible by considering a Scheme with as few shifts in the line of sight as possible, which could then be weighed in the planning balance. My evidence is that a direct visual link is possible.

2.3.43 Mr Clark claims I have not explained why '*the well-established design approach of staged, sequenced enclosure of views along movement corridors is inappropriate*'.

2.3.44 The staged sequence of views is inappropriate as a design approach in this context; in terms of policy; and in terms of failing to achieve the result that the policy is aimed at.

2.3.45 Staged, sequenced enclosure of views along movement corridors are incompatible with a movement corridor that is as direct with a direct line of sight.

- Staged, sequenced enclosure results in an indirect route- the route will seem longer, less a direct, and generally deter people from taking the route.
- Staged, sequenced enclosure results in indirect lines of sight-people cannot see where they are heading.
- Staged, sequenced enclosure results in a route that feels less safe.
- Staged, sequenced enclosure will not help break down existing barriers, such as the IDR.
- Staged, sequenced enclosure does not accord with policy and guidance.

2.3.46 The DAS confirms the design approach of staged, sequenced enclosure of views along movement corridors was locked into the Appellant's thinking at a very early stage, even though this conflicted with policy and guidance. I see no broader comparison of urban design typologies to demonstrate the Appellant's approach is the most appropriate for the site, the context, and the policy framework. The Appellant's Proofs are still arguing that a direct line of sight from the Station to the river is simply not possible when it is.

## 2.4 Reason for Refusal 2 (3.40)

2.4.1 Mr Clark at 3.40 – 3.82 attempts to demonstrate that buildings D and E do not harm the setting and character of the path and River thus harming the quality of the public realm. He discusses various factors which influence that character. I will demonstrate his conclusions on these various factors are erroneous.

[Distinction between urban centre and periphery \(3.41-3.46\)](#)

[Character influence of urban centre on Christchurch Meadows and Thames Path \(3.42\)](#)

2.4.2 Mr Clark claims the riverside setting is '*strongly characterised by intense urban development*', '*increasing scale and increasing visual influence*', and '*substantial built form*'. This is not correct.

2.4.3 My PoE (4.2.18-4.2.32) contains a more careful dissection of the riverside character.

2.4.4 Mr Clark is drawing upon development set inland and away from the Appeal site, such as 'Thames Quarter', to suggest the context is fundamentally changing. I disagree. Apart from the Allocated Site, no significant change is planned along the riverside strip between Reading Bridge and Caversham Bridge. I agree distant development will affect the background views, but not at the river interface, where no other change is planned, and the Appeal Scheme must fit within the existing context.

2.4.5 I disagree with Mr Clark's characterisation of Christchurch Meadow. There are facilities that one would typically find in an urban park. Still, it is more than simply an urban park and includes more tranquil elements alongside the facilities mentioned. Figures 2a and 2b are carefully selected images that do not show the whole open space. Nevertheless, they show that the play equipment sits within a wider river meadow context in which open meadows and mature trees are still clearly the dominant features. The overall character is far closer to a natural landscape than a planned urban park.

2.4.6 LP EN13 confirms the Thames is designated Major Landscape Feature in policy. The tranquil nature of the Thames is set out in paragraph 4.2.46 of the Local Plan.<sup>7</sup>

**Near-continuous built frontage (3.43-3.46)**

2.4.7 I agree with Mr Clark's claim that there is a near-continuous built frontage at or near the river. Our difference is in describing the character of that frontage.

2.4.8 Mr Clark's Figures 2a and 2b do not cover the entire river frontage - because the areas to the west, near Fry's Island, is heavily wooded (with one and two-storey chalets and sheds). It is a partial view.

2.4.9 Mr Clark claims there is an immediate built frontage '*of substantial scale*'. This is not correct.

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<sup>7</sup> "Reading is built on two main rivers that contribute to the distinct character of the Borough. Each provides a very different character and role. The Thames remains largely natural in character, bounded by parks, green spaces and fields for most of its stretch through Reading, although it meets the edge of the town centre on the south bank between Caversham and Reading Bridges. The Kennet is similarly rural in the southwest of the Borough, but has a stronger integration into the fabric of the town centre than the Thames. It is important that development recognises and builds on these distinct characters (my emphasis)."

- 2.4.10 Riverfront building lines step forward and back from the edge, so they cannot be described as uniformly 'immediate' (see my PoE Figure 21). In some cases, buildings are set back behind generous private riverside open spaces.
- 2.4.11 Building heights generally rise to the east of the Appeal Site, with the immediate, on either side rising to only three and four residential storeys. The tallest riverfront buildings at Reading Bridge are outliers.
- 2.4.12 To the west, the riverfront buildings rise to three and four residential storeys. Two large, lower-rise commercial blocks lie to the west<sup>8</sup>.
- 2.4.13 I see no basis for Mr Clark's claim that the immediate built river frontage is substantial in scale. No policy or guideline promotes a significant increase of scale along the riverfront. Policy and guidance indicate the river and meadow setting and the low-rise streets to the west may be harmed by a substantial increase in scale. No other significant change is planned or proposed along the riverfront.

### 3.43

- 2.4.14 Mr Clarke helpfully elaborates on his use of the term 'utilitarian void'.
- 2.4.15 He is seeking to draw a contrast between the 'near-continuous and immediate built frontage of substantial scale' (which I strongly dispute for the reasons set out above) and '*a car park and office building adjoining a substation and flanked by a wire fence and retaining wall bordering the Thames riverside path*'.
- 2.4.16 I would tend to agree with Mr Clark's now much better-balanced claim that the Appeal Site is essentially an open hard space amid a wider built townscape. I still maintain the term 'utilitarian void' (used in the TVIA baseline assessment) is pejorative because it fails to properly recognise the positive qualities of the openness of the aspect and longer-distance views over the site that create a more open setting to the Riverside and

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<sup>8</sup> *Caversham Bridge House (two commercial storeys with parking podium below and roof/attic storey 50m from the river edge with a small pocket park in front). Brigham Place (three commercial storeys plus parking podium and roof turrets/decorative towers set 60m from the river edge and a small, private pocket park in between).*

Meadows. I am not suggesting this should be preserved, but that its loss should be properly weighed in the balance in the TVIA.

2.4.17 I agree that the southern part of the site is not characterised by an open aspect (para. 3.44), but it is also not a 'utilitarian void'.

2.4.18 I believe my statement at SoC 3.10.5, that *'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'*, is correct. Mr Clark's point (para 3.45) is that I have not fully explained the reality of the character and use of the Appeal - but that is the purpose of Mr Clark's baseline assessment in the TVIA, which I contend he has not approached in a balanced way.

2.4.19 Mr Clark's states, *'The Appeal Site has no townscape or visual amenity value'* (para. 3.46). This wrong and completely ignores the fact the Site contains a locally listed building, which the TVIA also overlooks. Contrary to Mr Clarke's claim (para.3.46), this presents a very high-quality townscape at the interface between the town centre and riverside, at least for part of the Vastern Road frontage.

#### Gateway features (3.50-3.51)

2.4.20 Mr Clark (3.51) misunderstands and then misrepresents my point concerning gateways. At no point do I suggest or infer the route to and from the town centre via Christchurch Bridge, *'a gateway'*, is *'less important'*. My evidence is that the link is of strategic importance (which Ms Cohen disputes). My point is that it is in an entirely different category from the main road gateway bridges.

2.4.21 Mr Taylor (PoE 3.67), contradicting Mr Clark, disputes Christchurch Bridge is a gateway and landmark.

#### Christchurch Bridge as a landmark and focal point (3.52-3.58)

##### Paragraph 3.54

2.4.22 The Tall Buildings Strategy Update Note is referred to here. However, the Note does not say that the support pier is *'barely visible'* as claimed here, but it is *'visually separated'*.

2.4.23 It states: *'In none of these views does the bridge appear as showing any legibility of how to reach it'*: That is because the legibility needs to be created by the appeal site. The

bridge was specifically designed to allow a new approach from the south through the Appeal Site. It is unclear how to reach the bridge because links to that bridge are currently indirect and unsatisfactory.

2.4.24 My PoE Figure 28 shows a direct line of sight from Vastern Road to the Bridge and its support pier.

### 3.55

2.4.25 Mr Clark misrepresents the context of my remark (SoC 3.10.1) that Christchurch Bridge mast is an '*unmistakable landmark, gateway and legibility marker*'. I am referring to the view from the Station concourse (but note there are ground-level views from the northern station interchange).

2.4.26 Therefore, I disagree with Mr Clarke's statement (para. 3,55) that '*the bridge support pier isn't an unmistakeable landmark, gateway and legibility marker from the south*'.

2.4.27 Mr Clark is trying to suggest there are no current, notable views of the bridge support pier from the south in the vicinity of the Station and Vastern Road and no practical opportunities to create them in the future: I disagree with both conclusions.

2.4.28 Mr Clark then suggests the principal legibility function of the bridge in the townscape is in marking the crossing and providing a focal point for routes from the west, north and east towards the town centre across the open space. He omits reference to any townscape function from the south: I disagree.

### 3.56

2.4.29 Mr Clark suggests his cumulative montage P2 shows that the skyline would be dominated by development within the Station Area Cluster cumulative schemes and my comment (SoC 3.10.1) that the broader skyline backdrop of the bridge is 'impressive' fails to recognise this. My statement relates to the TVIA baseline - the site and setting today - which Clark has been unable to describe in a sufficiently accurate and balanced way (riverfront heights, openness, utilitarian void etc.).

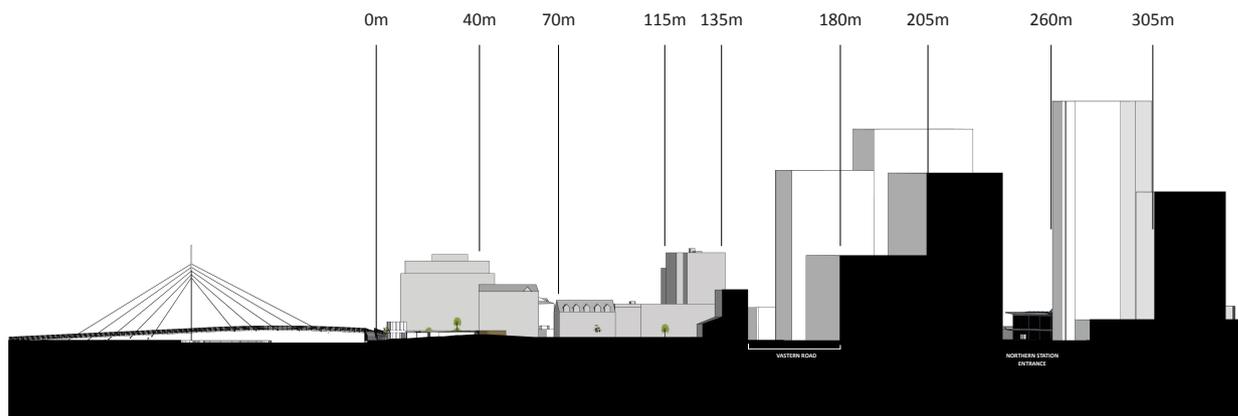


Figure 5 Cross-section from the River to the Station showing the long setback distances between buildings shown in MR Clark's Figure P2

2.4.30 Mr Clark is misreading what is shown at P2 and fails to address the specific focus of RFR2. This is partly the result of limitations in what is shown in drawing P2. The LP envisages a tall building cluster around the station with lower-rise buildings towards the river, the Meadow, and lower-rise dwellings. The RSAF envisages a gradual increase in height from six storeys at the riverfront rising to the tall building cluster around the station. The RSAF envisages some taller landmark buildings rising higher than surrounding 'benchmark' heights within this gradation, although these are the exception. Viewed from the riverside and Meadow, this would create a 'layered effect' of lower foreground buildings rising gradually to taller buildings to the rear. The Appeal Scheme exceeds<sup>9</sup> (double<sup>10</sup>) the RSAF height guidance, introduces landmark buildings where none are proposed in guidance, and includes buildings rising to just below the CR10 tall building thresholds. Whilst I accept there is some scope to vary the relative heights and massing (and the RSAF anticipates this, e.g., RSAF Figure 6.5), RfR 2 focuses explicitly upon the failure to lower heights at the riverfront - the foreground.

2.4.31 Mr Clarke suggests that his Riverside Character Photographs 5, 11, 12 and 19 and Appeal Site Photographs 7, 8, 17 and 18 demonstrate there would be no competition in

<sup>9</sup> RSAF Figure 6.9 Scale /height guidelines gives benchmark heights of 4 storeys for plot 'N1 (the west side of the Allocated Site) and 6 storeys for 'N2' (the east side).

<sup>10</sup> Block D - (equivalent to RSAF Plot N2) is 10 storeys (plus rooftop plant enclosure). Block E (equivalent to RSAF Plot N1) is 6-8 storeys

the view of the bridge from the proposed built forms, which would open up towards the bridge in views from the north. I disagree. The mass and terminated view will increasingly present a visual block as the observer moves closer to the bridge, rather than opening views through to the town centre, compounded by the height and proximity of Blocks D and E in relation to the riverside.

**Character of gateway townscapes (3.59-3.63)**

- 2.4.32 Mr Clarke (3.59) disputes my claim that 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 with so small a riverside open space.
- 2.4.33 I disagree with Mr Clark's assessment of river crossings in Reading shown in SoC Appendix 16. Appendix RC provides my description of these crossings.
- 2.4.34 He refers to the two buildings at Reading Bridge (Clearwater Court and Reading Bridge House) cross-referenced to Mr Taylor's SoC Appendix A (page 93).
- 2.4.35 Mr Clarke's assertion ignores the roadway area to claim the buildings are associated with small areas of riverside open space/public realm.
- 2.4.36 Mr Taylor measures the gaps between riverside buildings at Reading Bridge at the narrowest point - some 35m back from the river edge. He measures the widest point between Blocks D and E at 10m from the river edge for the Appeal Site. If the gap between buildings at Reading Bridge is measured 10 m from the water's edge, the gap would be over 50m wide (see Figure 6 and Figure 7 below). Mr Taylor's figures are not a fair basis for comparison. The impression is further distorted because of the curving form of Clearwater Court.
- 2.4.37 My sketch below (Figure 6) provides a fuller assessment of the open space at the riverside. This clearly shows that the buildings at Reading Bridge frame a far larger open space than the Appeal Scheme. The impact of the taller buildings at Reading Bridge is offset by the scale of the open space they frame. The Appeal Scheme (Block D) is taller than Clearwater Court - but it frames a notably smaller new public space.