

2.4.38 The buildings at Reading Bridge do not interrupt a direct view south towards the town centre, creating a far more open feel than the Appeal Scheme. Mr Clarke's Figure 7 (extract from Riverside Character Photograph 10) does not show the view between the buildings aligned with the road. His view is from an angle, which reduces the openness of the view through and emphasises new development to the rear that is offset from the main view through the gateway.

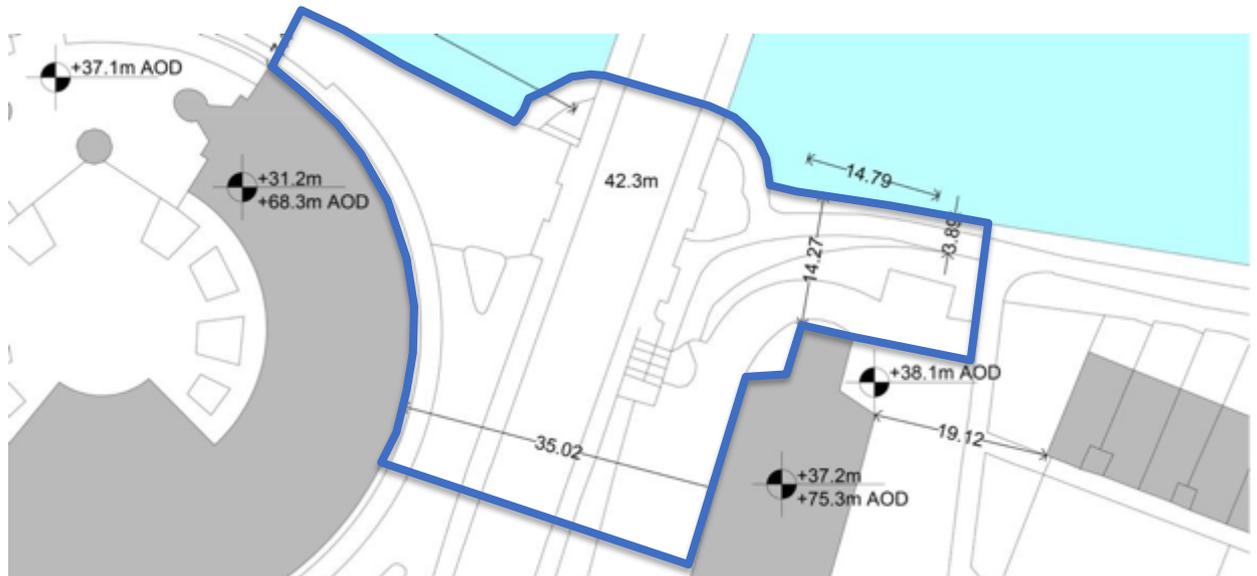


Figure 6 Marked-up version of Design SoC Appendix 14 Fig. 'I' (page 93)



Figure 7 Marked-up version of Design SoC Appendix 14 Fig 'E' (page 89)



Figure 8 View from Bridge aligned with the road looking towards the town centre

Quality of riverside open space (3.64-3.65)

Sense of enclosure to south of river (3.67-3.70)

- 2.4.39 Mr Clark's discussion at 3.67-3.70 fails to grasp the specific criticism I am making at my SoC 3.11. I am not referring to the southern towpath in general but to one particular stretch in front of the scheme that is not represented in the TVIA images: The towpath between the bridge approach ramp and the scheme where an undercroft parking area faces onto the towpath set behind a landscape strip. In my view, this space will not have an open character and will be poorly surveilled.

Nearby terraces in the context of townscape intensification (3.71)

- 2.4.40 I dispute my Clarks claims here based on my earlier comments on the TVIA baseline assessment.

- 2.4.41 Mr Clark is arguing the low-rise terraced streets to the west are 'anomalous', which is not borne out by the facts. Looking at Lynmouth Road, De Montfort Road, Brigham Road, Thames Avenue, the norths side of Vastern Road (west of the site), and Caversham Road, I can see an unmistakable and consistent character and scale. There is,

therefore, no clear basis for his claim that *'they are not a defining influence on the evolving character of the area or on the Proposed Development'*.

2.4.42 Mr Clark mistakenly claims the area is subject to major change.

*Fit with current riverside setting (3.72-3.73)*

2.4.43 Mr Clarke (3.72) continues with his proposition that the context is *'evolving'*. He claims that the height and proximity of Reading Bridge House and Clearwater Court are the most relevant buildings closest to the Appeal Site when they are distant and have no significant impact on the immediate. Both he and Mr Taylor mischaracterise the setting of these buildings and their relationship to the river.

*Paragraph 3.75 (building height in relation to the Tall Buildings Strategy thresholds)*

2.4.44 Mr Clark states there are positive townscape and visual reasons for buildings of landmark scale at this location (3.75). That does not explain why the heights he proposes are double the RSAF guidelines and just below the CR10 tall building threshold.

2.4.45 Mr Clark repeatedly draws on the example of buildings at Reading Bridge but fails to recognise that this is outside the RSAF boundary. Mr Clark rehearses his assertion that tall buildings are characteristic of river crossings in Reading, which I do not accept as set out in detail at Appendix RC why this is unfounded.

2.4.46 For example, at Caversham Bridge crossing of the Thames, the tallest buildings adjacent to this crossing are around 4-5 storeys – similar to the benchmark heights of 4 and 6 storeys identified for this Appeal Site in RSAF Figure 6.8.

2.4.47 There are few and primarily only recent examples of tall buildings near river crossings in Reading. These coincide with the major junctions on the Inner Distribution Road and, in some cases, main arterial roads, such as Reading Bridge.

2.4.48 The argument about Thames crossings being flanked by buildings of substantial scale is valid for Reading Bridge but falls at Caversham Bridge. The bridge at Duke Street is surrounded on three sides by low rise historic buildings of 2-5 storeys. Where Mr Clark finds examples of taller buildings these are associated with the IDR and major road

junctions. The one example of a recent tall building is set next to a major junction and within the eastern tall building cluster (LP CR10).

**Height and mass of built form (3.74-3.82)**

- 2.4.49 Mr Clark (para. 3.80) argues that Christchurch Meadows, the Thames Riverside and footpath and Lynmouth Road are sensitive to the effects of tall buildings, but not to buildings any lower than the CR10 threshold.
- 2.4.50 I agree that is what RSAF Figure 6.10 shows, but it does not follow that there is no sensitivity to development below the CR10 threshold. I note Lynmouth Rd. and the tip of Frys Island are shown as a '*nearby sensitive location – low-density residential*' on Local Plan figure 5.3.
- 2.4.51 Mr Clark's paragraph 3.79 draws on the foregoing paragraphs to conclude the characteristics of intense development of the town centre should be extended to the riverside. Mr Clark's approach does not allow for any gradation in terms of height, bulk or density or adaptation in response to the riverside setting or the general characteristics of the riverside strip north of Vastern Road - where no other change is proposed. The only main characteristic of central area lacking is a multiplicity of land uses.
- 2.4.52 Mr Clark argues the dramatically intensifying town centre meets the Thames at the Appeal Site - so the site in this location needs intense built development. The tall buildings strategy and LP CR10 indicate the opposite, that the greatest intensity should be clustered around the station and the intensity reduce away from this point.
- 2.4.53 Mr Clark and Mr Taylor's attempts to draw upon tall and dominant building power station typologies from the 1930's to justify intense built development that extends the characteristics of the town centre right up to the river is fundamentally wrong - because Reading town centre is not characterised by such buildings - they are alien imports.
- 2.4.54 The proposals far exceed the footprint, bulk and height of the former power station buildings. The tallest chimney on the site (two are lower than the Appeal Scheme) is tall and slender, which the Appeal Scheme cannot and doesn't replicate.

## 3 Design

3.1.1 Proof of Evidence: 'Design' by Dave Taylor ('Mr Taylor').

### 3.2 3.0: Response to Reading Borough Council's Statement of Case

#### RfR 1 – High Quality North South Link (3.2)

Direct Link: Accordance with Policy (paras. 3.3-3.10)

##### Paragraph 3.3

3.2.1 Mr Taylor notes RSAF Views 62 and 63 (RSAF para.7.10, page 42) and claims, '*At no point does the RSAF combine these two points to ask for views between the Station Square and public space on the Thames as Mr Doyle suggests*'. Mr Taylor ignores the full, combined implications of RSAF para. 7.10, the associated Figure 7.2 and the description of views 62 and 62 in the grey table (the only 'new' views references in 7.10).

3.2.2 The RSAF asks for a direct line of sight between the station and the Thames: '*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.***' (Paragraph 7.10 with my emphases added). The origin of View 62 shown in Figure 7.2 is the Station Square with the arrow pointing directly to the origin point of View 63 on the Thames riverside. The origin of View 63 on the Thames riverside and the arrow points directly to the origin point of View 62, the station square. They are reciprocal, as I intended when I drafted the RSAF. If either origin point shifted to the east or west, I would expect the alignment of the arrows to adjust accordingly and turn towards one another.

##### Paragraph 3.4

3.2.3 Mr Taylor's Proof suggests the Local Plan must repeat everything in the RSAF to continue to have any validity. I reject this entirely. The supporting text to policy CR11 (5.4.9) makes clear that the RSAF continues to be relevant. It does not state that only parts of it should apply. The purpose of the RSAF is as a supplement to the adopted policy. It is not for a new policy to take every element of the SPD and repeat it in the policy text; otherwise, the policy would be extraordinarily long and unwieldy.

3.2.4 Mr Worringham's rebuttal confirms it is categorically not the case that *'those who drafted the Local Plan were perhaps accepting that unbroken views from station to river would not be possible to achieve.'*

3.2.5 The Local Plan policy was drafted before the Council was aware the site was to be subdivided. The former owner of the Appeal site and current owner of the remainder of the Allocated Site indicated the Site could and would be developed comprehensively.

3.2.6 Mr Taylor claims the Committee Report accepts that the line of sight along the north-south link between the future Station and the River Thames is *'difficult, if not impossible, to achieve'* (para. 4.45). He omits the vital context at the beginning of the paragraph and adds 'if not impossible' at the end: 4.45: **'A consequence of the subdivision of the site is that it appears that a single visual link from the Station to the Thames would be very difficult to achieve'** (emphasis added). The Appellant sought from the outset to create the *'appearance'* that the link was impossible to achieve. The LPA has never accepted this, and the term *'if not impossible'* does not appear in earlier LPA Policy responses - it has been added by Mr Taylor.

3.2.7 Mr Taylor fails to detail what insurmountable constraints make the link *'difficult if not impossible to achieve'* when my PoE demonstrates it is possible to achieve the link. I do not think this is any more challenging than for many other urban redevelopment schemes like this. It requires some flexibility on form, layout, and development quantum. My evidence demonstrates that the Appellant's design approach has been insufficiently flexible.

*Paragraphs 3.5 and 3.6*

3.2.8 Mr Taylor at paras 3.5 onwards confuses and conflates what policy and guidance are asking of him. The direct north-south link extends from the station to the river Thames with the direct line of sight aligned with that route.

3.2.9 Mr Taylor's Figure 3.4 demonstrates a complete misunderstanding. The north-south link and direct line of sight should be to the River Thames, not the mast of Christchurch Bridge or the river's surface.

*Paragraph 3.7*

- 3.2.10 Mr Taylor further demonstrates his misunderstanding in reference to Figure 3.3, the view north along Lynmouth Road. He mistakenly claims *'there is no visual link to the river even with fewer obstructions'* and *'in wayfinding terms, any such marker of legibility must rise above the horizon when taking into account the site levels'*.
- 3.2.11 My Figure 3 Enlargement of Figure 17 from Main Proof shows an enlarged version of the view down Lynmouth Road in which I can see the large, mature trees of Fry's Island and a boat moored in front. I can see the moored boat's *'plimsoll line'* and a sliver of water to the right, even from this distance. I would also expect to see craft occasionally sailing by. In my view, there is a clear link to the river that will become increasingly clear when travelling northwards along Lynmouth Road.
- 3.2.12 The concept of a *'marker of legibility'* is Mr Taylor's own. It does not follow the RSAF guidance on views. A resident offering direction to a visitor at the corner of Vastern Road and Lynmouth Road would have no difficulty suggesting they look towards the moored boats and trees at the end of the street.

*Paragraph 3.9*

- 3.2.13 My rebuttal of Mr Taylor's points at para. 3.9 are already addressed in my answer at para. 3.3 above. Both Mr Clark and Mr Taylor's *'nodes'* are limited to the station and subway entrances and Christchurch Bridge Mast. I have explained that there are further nodes they have ignored- including the river itself.

**Direct Link: Visual Links (paras. 3.11-3.19)**

*Paragraph 3.11*

- 3.2.14 Mr Taylor suggests that he is not aware of policy or guidance which states that the provision of a direct line of sight produces a more attractive route. He is wrong. The idea that a straight route and unbroken line of sight will result in a *'safer'* and more *'attractive'* route stems from national guidance.
- 3.2.15 My SoC (para. 2.16.2) highlights that good sightlines are supported by national guidance. MHCLG's Guidance Notes for Design Codes confirms: "Good sightlines aid wayfinding" (paragraph 34).

3.2.16 NDG (page 32) Public Spaces, P2 - Provide well-designed spaces that are Safe. Guidance (105) states careful planning and design creates the right conditions for people to feel safe and secure, without the need for additional security measures including (4th bullet) *'reasons for people to enter into the space, for an activity or destination or **because it is on a natural line of direction of travel'*** (my emphasis).

3.2.17 The Appeal Scheme does not provide a reason for people to enter the space (the north-south link) because they cannot see where it leads. The scheme offers an indirect route with a series of shorter lines of sight terminated by building blocks so that the route as a whole (from the station to the river) does not follow a natural line of direction of travel.

*Paragraph 3.12*

3.2.18 Mr Taylor's SoC (Appendix 14) does not include a policy discussion, which he presumably leaves for Mrs Cohen. Chapter 2 of his PoE responds to the revised NPPF and references the NDG (para. 2.4).

3.2.19 I provide various design references in my SoC to the National Design Guide (e.g., paras 82 and 83 at my SoC 2.5.13, 2.5.14) and National Model Design Code (para 34, referenced in Design SoC 2.5.17).

3.2.20 Mr Taylor states, *'I am not aware of any policy or guidance which states that the provision of a direct line of sight produces a more attractive route, and as such I do not consider that the straightness of a route is a measure of attractiveness.'*

3.2.21 Mr Taylor appears unaware or unfamiliar with national design policy and guidance against which the Appeal Scheme should be assessed - such as NDG para 82, which says, *'These (direct routes) are designed as part of attractive spaces with good sightlines'*.

*Paragraph 3.13*

3.2.22 Mr Taylor believes the fact the Crime Prevention Design Officer raised no concern over the safety of users of the north route is evidence the Officer considers the route within the appeal scheme would be safe.

3.2.23 Ms Chalmers commented solely on the design and layout of each block and the need for internal compartmentalisation.<sup>11</sup> She does not address or comment upon the wider site layout or the configuration of routes through the site.

3.2.24 Ms Chalmers would not be expected to reference or apply town planning guidance on the **perception** of safety as part of an attractive route (see the response to 3.11 above).

*Paragraph 3.15*

3.2.25 Mr Taylor responds to my SoC 2.16.1 third bullet, where I state that Vastern Road currently reads as the edge of the central area with no visual clue announcing the river and meadows beyond in the vicinity of the site. He correctly points to the fact that there is a single, occluded view of the top of the Christchurch Bridge mast from a small section of Vastern Road looking over the SSE entrance gates (his Figure 3.2 allows a less occluded view because it is not from Vastern Road). Earlier at 3.6, he argues there will be *'no suggestion of the existence of, the river from Vastern Road except for the mast of Christchurch Bridge'*.

3.2.26 The SSE site is proposed for comprehensive redevelopment when Mr Taylor's limited views of the bridge are very likely to be lost. The need for an unbroken line of sight through the Appeal Site is only made more vital as a result.

*Paragraph 3.18/Figure 3.5*

3.2.27 As I have already set out above, Mr Taylor selects only three potential nodes as the origin and destination of the north south link (station entrance doors, subway entrance and bridge), which is not present in policy. The potential nodes and points to connect include the station square and the riverside.

3.2.28 Mr Taylor's Figure 3.5 demonstrates the opposite of what he intends. His blue arrow shows a direct alignment for the north-south link and a direct line of sight from the station square to the river in accordance with RSAF 7.10. Mr Taylor, Mr Clark, and Mrs Cohen claim this is impossible to achieve.

3.2.29 Mr Taylor claims the area of blue hatch at Figure 3.5 shows how the SSE site would obstruct a view from the station underpass. His Figure 3.6 shows a direct line of sight

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<sup>11</sup> Appeal Document 4e CPDA correspondence with case officer Sept/Oct 2020

from a midpoint between the station entrance doors and subway entrance, and the river. Mr Taylor, Mr Clark, and Mrs Cohen claim this is impossible to achieve.

3.2.30 Mr Taylor's explanation of the two figures at para. 3.19 introduces the concept of the 'the station nodes' (the station entrance doors and the subway entrance) and the 'riverside node (landing of Christchurch Bridge)' to make his case. These terms do not follow from the RSAF guidance and demonstrate Mr Taylor's broader confusion about what the RSAF says and how it should be appropriately applied.

3.2.31 Mr Taylor's figures helpfully define the likely limits of the 'Station Square' - the origin of RSAF 'View 62 -Station Square north looking north'. In drafting the RSAF, I deliberately framed the description of View 62 to allow some flexibility in response to the final configuration of the new station, the northern station entrance and subway, the station square, the bus, and taxi interchange, the 'Royal Mail' site and Reading Station Park (Aviva) sites.



Figure 9 Mr Taylor's Figure 3.5 with direct line of sight from subway entrance to riverside shown as a dotted pink arrow

*Figure 3.6 (Aviva site planning status)*

- 3.2.32 The planning application on the Aviva (Reading Station Park) site has not been determined. The thin blue line on Mr Taylor's Figure 3.6 is dictated by the gaps between buildings on a parameter plan submitted for the Aviva site.

*Paragraph 3.19*

- 3.2.33 Mr Taylor repeats his errors and misconceptions when he claims; 'a direct view cannot be achieved between either of the station nodes (underpass and station entrance) and the riverside node (landing of Christchurch Bridge)'. The visual links numbered 62 and 63 of the RSAF do not mention 'station nodes', 'underpass', 'station entrance' or the 'landing of Christchurch Bridge'.

- 3.2.34 He states that "Any view would be off-centre to these points and would result in a loss of built form within the appeal site or a change to the schemes south of Vastern Road". The proposals south of Vastern Road are undetermined and may change. The appropriate baseline for assessment is that the development of those sites proceeds in accordance with the LP and RSAF.

- 3.2.35 Achieving the north-south link is the main priority for the Allocated Site- even if this results in a loss of built form within the appeal site or a change to the schemes south of Vastern Road, as LP para 5.4.6 states.

**Direct Link: Alignment and Configuration of Ramps (paras. 3.20-3.23)**

*Paragraph 3.20*

- 3.2.36 Mr Taylor summarises in para. 3.20 what he considers the leading site constraints, which he considers have necessarily limited any broader consideration of alternatives- and the reason why a direct north-south link and a single line of sight cannot be provided. He frames these as 'principal objectives in relation to the(se) constraints'.
- 3.2.37 I have broken down Mr Taylor's three points into the specific site constraints he mentions. Looking at the list, I see that many of Mr Taylor 'site constraints' are, in fact, design objectives, not absolute constraints, which can be balanced against one another. These are familiar because they are repeatedly used (in different forms) by Mr Taylor

and Mr Clark to justify the Appeal Scheme. In each case below, I question why ideas have not been considered further.

*Providing visual blocking of the unsightly SSE equipment.*

3.2.38 In the 'Proposed CGI from previous scheme' on page 72 of the DAS, I see a green wall at the right-hand side of the image that appears to act as a visual barrier. This is in place of the now proposed block C. The green wall arrangement opens many options for aligning a direct north-south link from the station to the river.

3.2.39 I have proposed alternative footprints of Block C to provide a more direct north-south link that were not considered. Mr Clark and Mr Taylor now say these are less desirable and a less efficient use of the land, but they have not explained if or why they will act as a less efficient acoustic barrier.

*Providing acoustic blocking of the unsightly SSE equipment.*

3.2.40 The green wall shown in the CGI on page 72 of the DAS can act as an acoustic wall as an alternative to building C. The wall can be removed to open the whole Allocated Site -if and when the SSE site comes forward for development.

*Providing active frontages throughout the entirety of the north-south route.*

3.2.41 The Appeal Scheme is not the only way to provide active frontages.

3.2.42 DAS page 72 shows a low-rise housing terrace on the left as an alternative to Block C to maintain continuous active frontages.

3.2.43 An alternative could have been considered where there was substantial planting on either side of the middle, narrow section with a broader pathway for the route.

3.2.44 CR11 (iii) asks that developments in the MOA provide developments that front onto and provide visual interest to existing and future pedestrian routes and open spaces. It does not require that this is continuous and there are alternative ways to provide visual interest other than building frontages.

*Providing activity, interest, and natural surveillance of the route*

3.2.45 Building frontages are not the only way to provide activity, interest, and surveillance. This could be provided through planting, areas of lawn and recreation spaces with natural surveillance ensured through a wider route and direct line of sight.

*Passively encouraging slower cycle speeds*

- 3.2.46 Placing housing blocks and entrances near a cycle route is not the only way to encourage slower cycle speeds. A wider pedestrian and cycle pathway along the north-south route with more space to share indicates there is no need for measures to encourage slower speeds - as is the case with the approach ramp to Christchurch Bridge from the north.

*Connecting the significant change in levels between the bridge, towpath, and site*

- 3.2.47 My SoC and PoE demonstrate changes in level (some of which are design choices by Mr Taylor rather than site constraints) do not prevent the creation of a direct link (My PoE Figures 30, 31, 32, 34, 35, 36).

*Minimising the separation of routes between these three levels.*

- 3.2.48 My SoC and PoE demonstrate alternative ramp and stairway configurations that permit a direct link (e.g., PoE Fig. 30 and 31). Mr Taylor does not explain why the integration of routes is a necessary site development constraint.

- 3.2.49 Mr Taylor's PoE fails to explain why these constraints have not been examined in detail along with alternatives. In my view, Mr Taylor is using them as a design rationale and justification for the Appeal Scheme. He has not explained why the constraints above (some of which cannot correctly be described as site constraints) lead, inevitably, to his conclusion that the direct north-south link, the priority for this site, is not possible.

- 3.2.50 Later, at para. 3.34, Mr Taylor refers to the '*multi-faceted (design) approach which challenges and explores the tensions and opportunities of all the site constraints.*' The opportunity and constraint that has either been ignored or rejected by Mr Taylor is the direct line of sight aligned with a direct north-south link between the station and the river, which is practicable, despite Mr Taylor's evidence, and the main priority for the Appeal Site.

*Paragraph 3.22/Figure 3.7*

- 3.2.51 My SoC Figure 4 shows the most direct pedestrian route through the site to Christchurch Bridge. Mr Taylor's Figure 3.7 and para. 3.22 draw attention to a slight shift in the alignment where the path through the site meets and aligns with the bridge. I consider this almost imperceptible. The shift is even less than Mr Taylor suggests

because his pink asterisk is slightly off-centre to the line of the bridge. The comparison is not fair because the serpentine ramp is available for all users, whereas the *'direct route'* the Appellant draws on for comparison involves ten steps and cannot be used by many path users (including cyclists, the disabled, frail elderly, and parents with buggies).

[Direct Link: The Appeal Scheme Visual Links \(paras. 3.24-3.29\)](#)

*Paragraph 3.26-27/Figure 3.8,3.9,3.10*

- 3.2.52 Mr Taylor's Figure 3.7 is set up to show that the number of changes in direction in the view is the same on a *'clear'* site as with the appeal proposals. His Figure 3.8 shows changes in direction whilst *'ignoring the proposed development north of the station'*. It doesn't ignore that development at all. Without the north of the station proposals, there would be a clear line of sight between the underpass ("SU") and the change of direction 2, completely removing the change of direction 1 – so only one change of direction. This line of sight is not possible with the appeal proposals as shown in Mr Taylor's Figure 3.9.
- 3.2.53 The implication of Mr Taylor's Figure 3.10 is that views between the station and river (a partial glimpse of the bridge mast today -presumably to be preserved in the planned redevelopment of the SSE site) can be provided separately from the north-south route between the station and river, which is not what guidance indicates.
- 3.2.54 Mr Taylor's concluding paragraph at para. 3.27 repeats his misconception that the only visible component of the river worth framing in any view towards the river is the Christchurch Bridge mast- his *'nodal'* point (and Mr Clark's focus point). His analysis of site constraints is deeply flawed.
- 3.2.55 Concerning topography, Mr Taylor appears only to have taken account of the proposed finished levels in his Scheme in relation to the river level and Vastern Road. He takes no account of the fact alternative levels across the site are possible (see my PoE Figure 35), nor does he account for the fact the southern side of the station square is raised approximately 0.6m (three or more steps).
- [Direct Link: The Appeal Scheme Alignment and Configuration of Ramps](#)
- 3.2.56 Mr Taylor's Figure 3.11 and paras 3.28 and 3.29 examine changes in the route from the site entrance to the bridge.

- 3.2.57 Mr Taylor claims the Appeal Scheme presents the fewest number of changes in a user's view between the station and visible components of the river (i.e., the mast) and the fewest number of changes in direction.
- 3.2.58 I have already explained that the bridge mast is not a preeminent node that views should focus upon. It is desirable, but not required by policy and guidance.
- 3.2.59 My Appendix A shows a ramp arrangement that offers a serpentine ramp arrangement that I consider superior because the changes in direction are subtler and always turn towards the river. Mr Taylor's analysis treats all shifts in direction as of equal value when the fact is the Appeal Scheme switchback ramp is inferior because the changes in direction are more severe and do not follow the natural desire line.

[Direct Link: The Appeal Scheme Wayfinding \(paras. 3.30-3.38\)](#)

*Paragraph 3.31-3.32*

- 3.2.60 Contrary to Mr Taylor's claim, I have explained in design terms (SoC 2.5, 2.11, 2.16 and PoE 3.4 3.9) with reference to national and local policy and guidance why navigation and movement through the Appeal Scheme will not be easy. I, therefore, welcome Mr Taylor's acceptance that: *'Of course, a straight route would be easier to navigate than a curved or angled route for instance'*.
- 3.2.61 Mr Taylor's rehearsal at para. 3.32 of the wayfinding features of the Appeal Scheme (A route anchored by landmarks at either end, subtle changes in direction noted through deflected views, aided by public art, material choices, changes in character, additional signage and stud markers within paving) clearly show he is trying very hard to compensate for the fact that a straight route is simply easier to navigate - with little or no need for wayfinding measures (whether or not they are *'integral'* as Mr Taylor suggests).
- 3.2.62 When a visitor unfamiliar with Reading arrives at the northern station square and asks the way to the river, what will be the answer?

**Appeal Scheme**

*'If you look down there, you can see Vastern Road and a tall warehouse building. Cross the road, and you will see an artwork and studs in the pavement that carry you around the corner between warehouses. If you look ahead down the tree-lined path, you will see a warehouse-type building*

*at an angle. Walk towards that building, cross the access road, and you will see a ramp at an angle to the path you are on. If you look towards the top of the ramp, between the railings and the café, you will see the top of the bridge over the Thames. Go to the top of the ramp towards the café terrace for a view of the river. You will need to swerve sharply right up two further ramps or take the stairs beside the cafe to reach the bridge. Alternatively, you can go straight down the ramp towards the riverside path. There are plenty of signs to help you along the way if you feel a bit lost.*

Direct link and direct line of sight

*'If you go to the corner of the square and look straight down the path on your right, you can see trees and boats and may just be able to catch a glimpse of the water- that's the Thames.'*

3.2.63 In my view, the second route description is clear, simple, and more attractive. It is superior in design and wayfinding terms and accords with policy and guidance.

The Appeal Scheme Landscape (paras. 3.39-3.45)

3.2.64 The detailed Landscape proposals do not offset or sufficiently mitigate the limitations in the design of the north-south route.

3.2.65 Mr Taylor's PoE (para.3,39) points out that CR11g refers to potential riverside open space and the inclusion of areas of open space where possible. The Appeal Scheme demonstrates the potential for a riverside open space, and it is possible to include other small areas open spaces.

3.2.66 I demonstrate (e.g., PoE Figs. 34 and 36) that there is greater potential for more extensive, better configured, and therefore more valuable areas of landscaped open spaces.

3.2.67 Mr Taylor at 3.40 suggests the RSAF, mainly the exemplar photographs, seem to indicate areas of outdoor seating with '*not a single piece of soft landscaping*' is all that is required. I tend to agree that open space can and should include hard paved areas for active use, such as the café terrace. However, in my view, a balance needs to be struck between hard paving and paths on the one hand and planting and grassed areas on the other. The small and narrow grassed areas, which the Appellant suggests will function as soft or informal play areas, are insufficient to perform that function. There is no space for children play safely close to their homes.

3.2.68 Mr Taylor (3.44) argues that site constraints prevent the creation of larger and softer areas of open and landscape space. My Evidence is that there is more '*potential*'

(CR11g) and wider '*possibility*' (CR11v) than Mr Taylor has realised in the Appeal Scheme. A broader examination of alternatives (unconstrained by the less than immutable constraints he believes he is acting under) would offer a higher quality landscape of greater practical visual and recreational utility to residents and visitors and help mitigate the overall impact of this notably tall and dense scheme.

#### The Appeal Scheme Width of the North-South Link (paras. 3.46-3.51)

##### *Paragraph 3.47*

3.2.69 The LPA case on width follows national and local policy and guidance.

3.2.70 Mr Taylor states '*I am not aware of any national or local policy, nor any guidance, which states that the width of a route is a measure of quality, so one must presume that a "bigger is better" approach is Mr Doyle's opinion rather than fact.*'

3.2.71 The relevant quotes from the National Model Design Code (particularly diagrams 45 and 64) that refer to width are referenced in my Design Statement of Case (see 2.5.18 and 2.5.19). These set out how width contributes to a sense of place and security.

##### *Paragraph 3.48*

3.2.72 The width of the route, along its whole length, should be considered when considering what an appropriate width for the Appeal Site is.

3.2.73 Mr Taylor claims (para.3.48) that the other parts of the strategic N-S route are not comparable examples. I believe they are directly relevant. They demonstrate that the width of the Appeal Scheme's route is narrower than other parts of the key north-south route. Mr Taylor disregards the photographs of the route as unrelated examples when they, in fact, demonstrate the proposals result in a narrowing of the overall strategic route in the final, vital stretch as the route arrives at the River Thames.

3.2.74 Mr Taylor (para. 3.50) '*does not agree that the loss of the Goods Office (Block C) is an appropriate solution for the site*' because I have demonstrated (SoC Fig. 15 and PoE Figs. 31 and 32) that alternatives layouts in the vicinity of Block C permit the creation of a direct north-south route and direct line of sight. This would also allow a wider route and wider landscape strip to travel through the narrower middle part of the site (the middle of the '*hourglass*').

**Direct Link: Assessment of Mr Doyle's Proposals (paras. 3.52-3.60)**

- 3.2.75 My evidence demonstrates a direct link is possible. The Appellant claims it is not- because of a series of immutable constraints.
- 3.2.76 The drawings Mr Taylor points to at 3.53 are design exercises- lines of inquiry - working within the basic framework of the Appeal Scheme. The drawings are clearly labelled, and their purposes are explained (e.g., SoC Fig 15 'Direct Visual Link Proving Drawing').
- 3.2.77 Mr Taylor mistakenly refers to these as '*several options to redesign the scheme*'. They are the ideas that Mr Taylor has failed to explore in reaching his mistaken collusion that a direct link is impracticable.
- 3.2.78 I address each numbered point at Mr Taylor's para. 3.53 below.

*Principal comment 1 (para. 3.53)*

*Principal comment 1 (para. 3.53)*

- 3.2.79 The diagrams SK03 and 4 are focused on the appeal site and explore a direct line of sight from Vastern Road to the River. PoE Fig. 31 shows the base map expanded to the south and a direct link to Station Square.
- 3.2.80 My PoE Figures 31 and 32 show further examples of direct links from the station square to the river. In Figure 31 the alignment to the river is approximately 50m from the subway entrance and 25m from the base of the ramp in front. In Figure 32, the alignment is approximately equidistant between the station entrance doors and the subway entrance (20m).

*Principal comment 2 (para. 3.53)*

- 3.2.81 Mr Taylor gives weight to the Aviva/Reading Station Park proposals, which are undetermined and will be assessed against the same set of policies and guidelines as this appeal.
- 3.2.82 My PoE Figs. 31 and 32 demonstrate how a direct line of sight can be achieved in accordance with the outline framework diagrams in the Aviva application and opportunities where the Aviva scheme is altered.

*Principal comment 3 (para. 3.53)*

3.2.83 Mr Taylor's definition of a 'view of the river' is based on an unjustifiably narrow definition- a view of the river's surface (or sometimes the bridge pier).

3.2.84 Mr Taylor seems to suggest that a narrow line of view is not worth trying to achieve. This appears to be the reason why he has not tried at all.

3.2.85 My PoE Figures (PoE Figs. 34 and 36) overcome Mr Taylor's concerns.

*Principal comment 4 (para. 3.53)*

3.2.86 I agree the realisation of the main priority for the Site - the direct north-south link- is likely to result in fewer dwellings. However, I do not consider these should be treated as a loss when weighed in the planning balance - because the Appeal Scheme does not, in my view, accord with policy and guidance.

3.2.87 I have already explained above that there are alternative approaches to screening the SSE site that the Appellant rejected at an early stage. These are annotated on my SoC Fig 15 and are clearly shown in the Appellant's DAS Page 72.



Figure 10 Extract from DAS (page 72) showing green wall and potential visual and acoustic screen.

*Principal comment 5 (para. 3.53)*

3.2.88 The serpentine ramp arrangement is superior to the Appellant's switchback arrangement because the shifts in direction are subtler. Path-users travelling towards

the bridge will always turn towards the river, rather than 180 degrees in the opposite direction as with the switchback ramp arrangement. My arrangement allows cyclists and walkers to closely follow the natural desire line, always moving towards their destination rather than away from it. My Appendix RA shows a 4m wide serpentine ramp that will allow all path users to travel together without the need for alternative paths via steps.

*Principal comment 6 (para. 3.53)*

- 3.2.89 The sketch worked with the basic tenets of the Appellant's Appeal Scheme as much as possible to show the degree of change needed to create a direct link.
- 3.2.90 The sketch in Appendix RA demonstrates how a 4m wide serpentine ramp (or any intermediate width between 3 and 4m) can be configured

*Principal comment 7 (para. 3.53)*

- 3.2.91 I have not shown alternative ramp arrangements down to the riverside because the purpose of the sketch is to demonstrate how the Appellant's Scheme can be adapted to form a direct north-south link.
- 3.2.92 My Appendix RA Figure demonstrates how a 1:21 ramp can be configured.

*Principal comment 8 (para. 3.53)*

- 3.2.93 The Rule 6 party's concerns relate to the combined effect of the overbearing height and proximity of Block C.
- 3.2.94 The 'Proposed CGI from previous scheme' at DAS page 72 shows a low-rise, two-storey single aspect terrace of mews-type buildings near the rear garden boundary of Lynmouth Road dwellings.
- 3.2.95 My Figures (PoE Fig. 39) show how the Rule 6 Party's concerns are exacerbated by the proposed heights of Block D and E on the riverside (RfR 2).

*Principal comment 9 (para. 3.53)*

- 3.2.96 There is no in principle issue with preserving the Locally Listed Building. I have not shown this because the sketch aims to demonstrate how the Appellant's Scheme can be adapted to form a direct north-south link.

*Principal comment 10 (para. 3.53)*

3.2.97 A café and terrace in this exact form and position are not required. My sketch in Appendix RA shows alternative arrangements for the café and terrace.

3.2.98 Mr Taylor seems to be suggesting that the 'constraint' of the café and terrace arrangement he proposes is one of the reasons why a straight link cannot be formed.

*Principal comment 11 (para. 3.53)*

3.2.99 The sketch design exercise did not consider setbacks because that was not the purpose of the exercises. Mr Taylor's appendices showing riverside setback options demonstrate that Blocks D and E can be set further back.

*Principal comment 12 (para. 3.53)*

3.2.100 The sketch design exercise did not consider vehicle manoeuvring. That was not the purpose of the exercises I undertook. Mr Taylor seems to suggest a direct north-south link is not possible -because a particular internal road arrangement is needed in this part of the site, and there are no other options.

3.2.101 My sketch (Appendix RB) demonstrates that the road can be reconfigured to address Mr Taylor's and Mr Witchalls' concerns.

*Figure 3.20 (page33)*

3.2.102 Mr Taylor's Fig 3.20 (page 33) clearly shows that my scheme will provide a direct line of sight from the station square to the river in accordance with RSAF with no changes in viewing direction.

*Figure 3.21 (page 34)*

3.2.103 Mr Taylor again applies undue weight to the Aviva proposals, which are undetermined and subject to the same policy constraints in respect of the need to deliver the NS link as the appeal site.

3.2.104 The LP and RSAF requirement for a comprehensive approach allows the LPA to work with developers to co-ordinate layout and design between Allocated Sites to fully achieve the most important requirements of the Strategy Central Reading, the RSAF, The Station/River MOA, and the individual allocated sites: That is the direct north-south link and direct line of sight from the station to the river.

*Figures 3,22, 3.23 and 3.24*

- 3.2.105 Mr Taylor's analyses my drawings A (SKo3), B (SKo4), and C (SKo5).
- 3.2.106 He conflates the direct link and direct line of sight - the open corridor through the scheme between buildings and the view from the station to the river - with the line of the path that travels through the corridor and how the alignment of the path shifts direction.
- 3.2.107 My drawings demonstrate the direct north-south link and line of sight are achievable. Mr Taylor distracts us with separate consideration of the number of bends in the pathways. Mr Taylor's switchback ramp arrangement can be accommodated in all three of my drawings as easily as the serpentine ramp arrangement shown.
- 3.2.108 In relation to the line of the path and the arrangement of ramps and stairs, I have already clearly explained why I consider the serpentine arrangement superior to the switchback ramp.
- 3.2.109 Mr Taylor's claims as to the directness of the path along his switchback ramp ignore the fact that many path users will be unable to use the alternative stair arrangement.

*Paragraph 3.60*

- 3.2.110 The reference to the number of dwellings being in line with policy expectations does not reflect the fact that, as well as only being a guide, as clearly stated in LP paragraph 5.4.5, the dwelling range specified is for the whole Riverside allocation, not this smaller part of the site.
- 3.2.111 Mr Taylor appears to want it both ways. He wants the maximum development quantum to reflect, pro-rata, policy and guidance for the whole Allocated Site, notwithstanding the many site constraints. But these same constraints are given as the reason why he is unable to fulfil other requirements of policy and guidance - such as the direct north-south link and direct line of sight.

**Summary (3.61)**

- 3.2.112 Contrary to his claim, Mr Taylor has failed to demonstrate the RSAF 'aspiration' (his term) for an unbroken line of sight is impracticable. My evidence indicates that it is practical and an important policy objective for this site.

3.2.113 Contrary to his claim, Mr Taylor has failed to demonstrate that a north-south link from the station to the river is impracticable. My evidence indicates that it is practical.

3.2.114 Mr Taylor has failed to describe what immutable constraints prevent him from fully realising policy and guidance for the north-south link. Therefore, Mr Taylor's case falls back on whether his proposals for the indirect north-south link or the other planning benefits of the scheme to be counted in the planning balance outweigh such a significant shortfall in the Appeal Scheme. Mr Markhouse addresses the planning balance in his Proof.

### 3.3 Mr. Taylor's RFR 2

3.3.1 Taylor attempts to address RfR 2, signposting the sections with a sentence saying you will demonstrate how he has got it wrong.

3.3.2 Mr Taylor at 3.62 – 3.90 attempts to demonstrate that the height and setbacks of buildings D and E do not harm the setting and character of the river, that they are proportionate to buildings along the riverside, and the power station building typologies on which the scheme draws are appropriate. I will demonstrate his conclusions on these various factors are erroneous.

#### RfR 2 – Height and Proximity of Blocks D & E to the Thames (para 3.62)

##### Built Form (paras. 3.63-3.66 of SoC)

3.3.3 Mr Taylor (para 3.63) misconstrues the meaning of my sentence at 3.12.1.

*'The height, massing, and footprints of the riverside buildings, whilst architecturally interesting, are poorly related to the public spaces and routes to the watercourse.'*  
(3.12.1).

3.3.4 The buildings are architecturally interesting. However, the height massing and footprints are poorly related to the public spaces and routes to the watercourse.

##### Paragraph 3.64

3.3.5 Mr Taylor accepts there are gaps in the active frontage along the towpath.

3.3.6 He reasons that it is acceptable to provide 'dead frontage' here because it is in some way necessary for the first-floor level of Block D to align with the level of Christchurch

Bridge (in fact, the floor level is higher still necessitating a ramp down to the bridge level approximately 0.4m below).

- 3.3.7 Mr Taylor states the finished floor level below the bridge level is considered below the level required for residential accommodation but is acceptable for car parking. That, of course, is not the case with Block E, opposite, where there are ground floor dwellings with terraces facing directly onto the towpath providing direct, natural surveillance.
- 3.3.8 Mr Taylor's argument does not convince me because I can see that the relationship between the towpath, Block D and the bridge has been driven, at least in part by the podium structure extending out from Block D that provides additional car parking space.
- 3.3.9 In my view, the design cues taken by Mr Taylor (para. 3.65) have been taken and applied as façade modelling and detailing devices- they are superficial- rather than adopting the silhouette, proportions, and forms of Battersea and Bankside power stations. I address this further below in response to Mr Taylor's points on proportions.

#### Paragraph 3.66

- 3.3.10 Mr Taylor seeks to rebut my points on the riverside setting and setbacks of riverside power station at 3.66.
- 3.3.11 My PoE demonstrates that the height and setbacks of the riverside buildings Block D and E, combined with the monumentality of Block D (the *'Architecture of Power'* of 1930's art deco power stations), is inappropriate, noting that the redevelopment of Bankside and Battersea provided the opportunity to provide riverside large public space in front of appropriate proportions.
- 3.3.12 Mr Taylor correctly points out that both examples were set back substantially from the river's edge, unlike the former Reading power station. However, Mr Taylor's scheme is not based upon the footprints of the former power station. He adopts the height and mass of Battersea and Bankside, but not the associated setting and setback.
- 3.3.13 I would welcome a scheme that drew upon the far more modest scale, form, and silhouette of the Reading Power Station boiler house and turbine hall - an appropriate design response drawing on the contextual history and heritage of the site. Instead, Mr

Taylor has cast wider and chosen a power station typology from a different era and an entirely different form, scale, setting and architectural language.

3.3.14 Mr Taylor's Fig 3.25 shows a redevelopment scheme for Lots Road Power Station (it is unclear if the scheme has been implemented as shown). This is not a directly comparable model to use because it is positioned on a side creek, with the building rising directly up from the water's edge. I note that the proposed redevelopment scheme (My Figure 11 below - cropped from the right hand of the image my Taylor's Fig 3.25) include Creekside gardens and a large Public Square with a rotunda building at its centre.

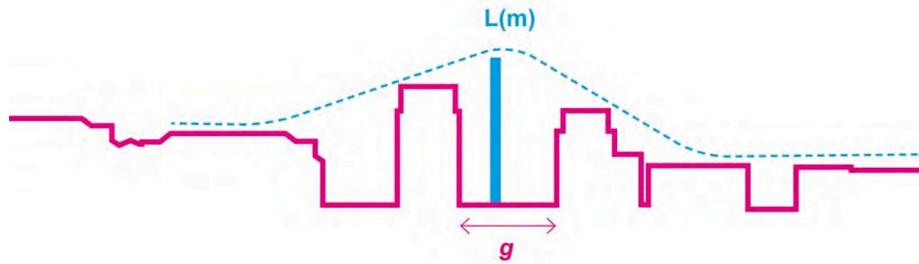


Figure 11: Lots Road Power Station Masterplan showing a large waterside open space setting for the historic power station. The red dashed line is the Power Station Footprint (RBKC).

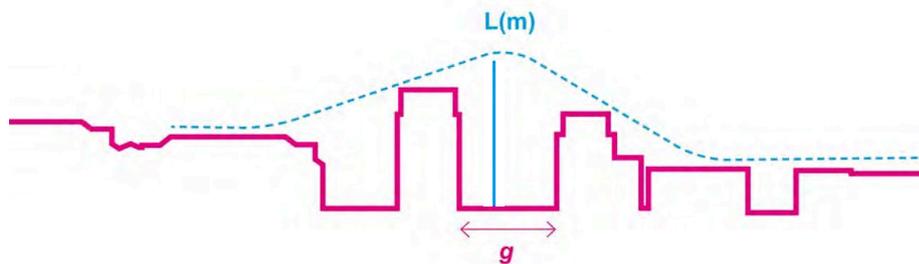
3.3.15 In the case of Lots Road, Bankside and Battersea, the appropriate design response has been to form substantial waterside open spaces as a setting for and response to the height and monumentality of the historic power stations.

Gateways (paras. 3.67-3.71)

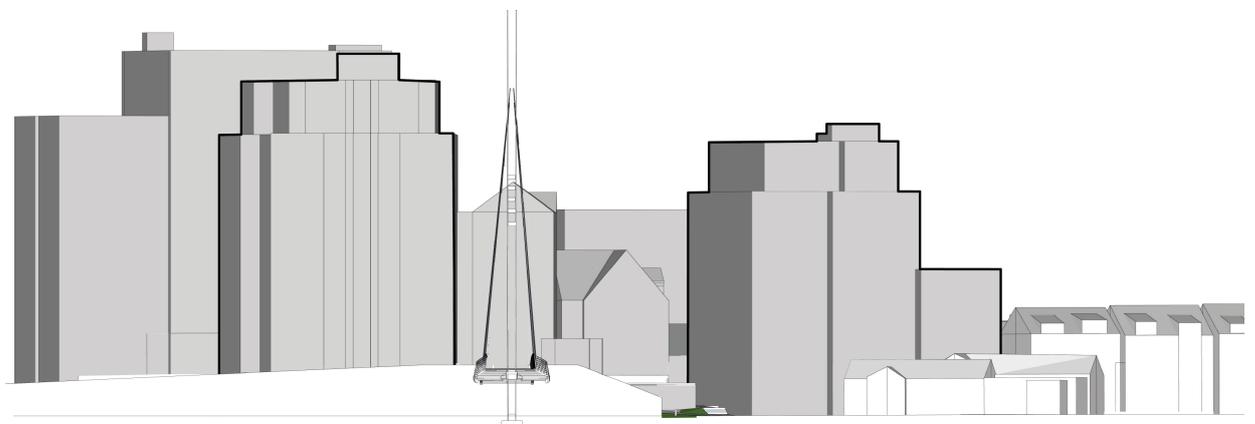
- 3.3.16 Mr Taylor (3.67) misconstrues the meaning of my SoC para. 3.14.2. I do not say *'the northern edge of the appeal scheme is an appropriate gateway point'*. I say:  
  
*'I agree that this is an appropriate gateway point, following on from the RSAF principles (3.14.2)*
- 3.3.17 I am clear at 3.14.2 that I disagree with Mr Taylor that the principle has been appropriately interpreted and applied in the Appeal Scheme.
- 3.3.18 I think Mr Taylor's conception of a gateway focuses narrowly upon the *'gateposts'* - i.e., the buildings that might frame a gateway. Gateways in a wider urban design sense relate to the passage between *'districts'* (relatively large sections of the city distinguished by some identity or character) and across *'edges'* (perceived boundaries such as walls, buildings, rivers, and shorelines).
- 3.3.19 In urban design terms, a gateway does not need gatepost buildings (Mr Taylor's *'gateway features'* at 3.68) to act as a gateway. The Christchurch Bridge gateway does not necessarily need framing with gate posts: But when such gateposts are provided they need to act as a two-way gate framing the bridge in both directions.
- 3.3.20 In my view, the Christchurch Bridge is both a landmark and a gateway. Mr Taylor's gateway buildings D and E, properly proportioned and set back from the river, could help frame the gateway satisfactorily. But that is not what the Appeal Scheme offers.
- 3.3.21 Instead, as Mr Taylor argues, and the Appeal Scheme demonstrates, Buildings A and B are the ***'primary gateway feature'*** (3.68). They do not, as Mr Taylor claims, *'complement the role of Christchurch Bridge'* - they compete with the bridge and diminish its primary role as the gateway.



Mr Taylor's Figure 3.6



Mr Taylor's Figure 3.6 with the Christchurch Bridge Mast to Scale



Parallel projection view of the Appeal Scheme Aligned with Christchurch Bridge Mast

Figure 12 Assessment of Mr Taylor's Figure 3.6

Paragraph 3.69 (Fig 3.26)

- 3.3.22 I demonstrate that riverside building height and massing are overly dominant in relation to the Meadows and the bridge.
- 3.3.23 Mr Taylor refers to my SoC where I say: *'The gateway envisaged in the RSAF is a two-way gate framing the bridge'* (3.14.8).
- 3.3.24 Mr Taylor's Fig 3.69 sets out to indicate that the scale of the bridge in relation to his two gatepost buildings is proportionate, and the buildings are subordinate. The Figure shows only the mast of the bridge in diagrammatic form with a thick blue line that overstates the mast's slender, white painted form. The diagram only demonstrates that the mast is taller than the riverside facades of Buildings D and E. The gap marked 'g' suggest only three prominent vertical features in the view. It does not show the actual forms and relationships or the proposed buildings behind in the gap marked 'g' that will enclose the space in an approximate horseshoe shape. I also note how much taller the appeal proposals are in relation to the adjacent riverside buildings.
- 3.3.25 Fig 3.26 does not show, as Mr Taylor claims at 3.70, 'the approach from the meadow' nor *'the reverse view towards the meadow'* because the diagram is not a view; it is a section.
- 3.3.26 My PoE Figure 50 'View A' is closest to the view Mr Taylor seeks to represent. This shows the bridge (not just the mast). The mast is taller, but as the eye travels lower down to the bridge deck, there is no clear sense of the gatepost buildings properly framing the view or the balanced relationship with the bridge as a whole.
- 3.3.27 The bridge is doing its job very well as a gateway and landmark; the Appeal Scheme appeal scheme detracts from the bridge in its role as the gateway?

Characteristics of the Riverside Built Form (paras. 3.72-3.75)

- 3.3.28 Mr Taylor at 3.72 sets out to demonstrate that the appeal building heights in relation to their setbacks from the river and gaps between built form, are comparable to existing buildings along this stretch of river. He has not done so for the reason I set out below. I

dispute Mr Taylor's measurement of the ratios of the relationships between building setbacks and height.

- 3.3.29 His analysis narrowly focuses on gaps between buildings when a fuller urban design analysis should focus on the riverside spaces these buildings help define, which my SoC Figure 18 shows. Mr Taylor claims this offers no useful assessment of riverside space when the illustrations clearly show these spaces' shape and relative proportions and how open they are to the river.
- 3.3.30 Mr Taylor's selected study area is not objective. It extends twice as far to the east of the Appeal Site, taking in the taller and closer riverside buildings on either side of Reading Bridge (Clearwater Court and Reading Bridge House). The study area does not extend the west to Caversham Bridge and the riverside buildings on either side, where heights are more modest or further east beyond Reading Bridge House (see DAS 2.8.4).
- 3.3.31 Mr Taylor's calculates the building setback distance from the closest point of the building to the river. The resulting height to width ratio provides a useful figure for comparison where all buildings are rectilinear, and the river frontage broadly parallel with the riverside. However, it provides a misleading figure and poor basis for comparison where buildings are not rectilinear or tangential to the river.
- 3.3.32 I give the following example for 'H' Clearwater Court.
- 3.3.33 The curving shape of this building and the *'broken crescent'* form is unusual. A more reasonable approach would be to treat the two *'wings'* of the crescent as separate riverfront buildings. In this case, the eastern wing (measured by Mr Turner) would remain at 4.3, whereas the western wing ratio would be as follows.
- Height of building relative to towpath 31.2m (A figure I dispute below).
  - Distance from the river to building frontage 23m.
  - Height to width ratio 1.36-1.

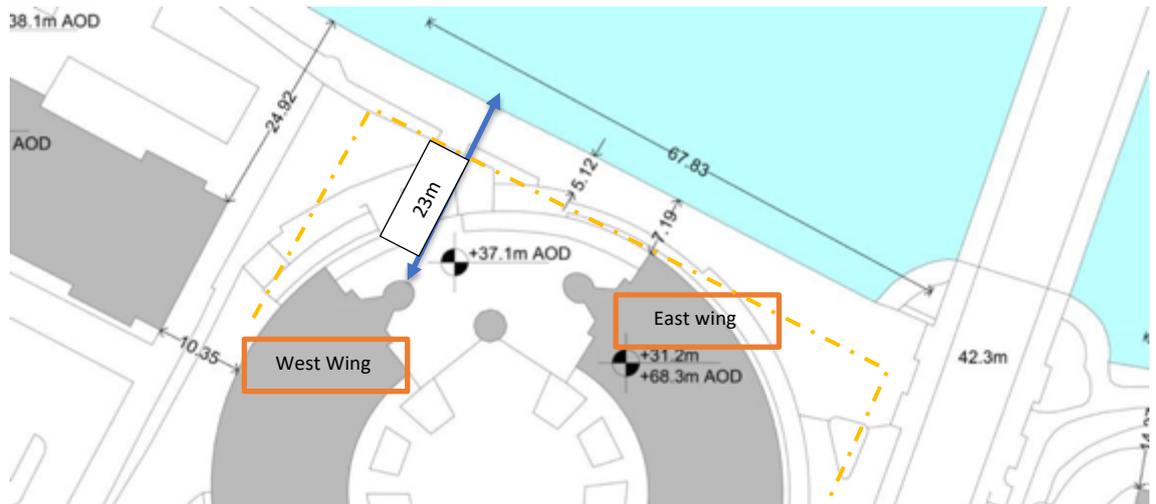


Figure 13 Analysis of H, Clearwater Court (Page 92 SoC Design Appendix 14)

- 3.3.34 The orange dotted line shows the implication of Mr Taylor's ratio methodology, which misrepresents the distance and height relationship of the actual building to the riverside.

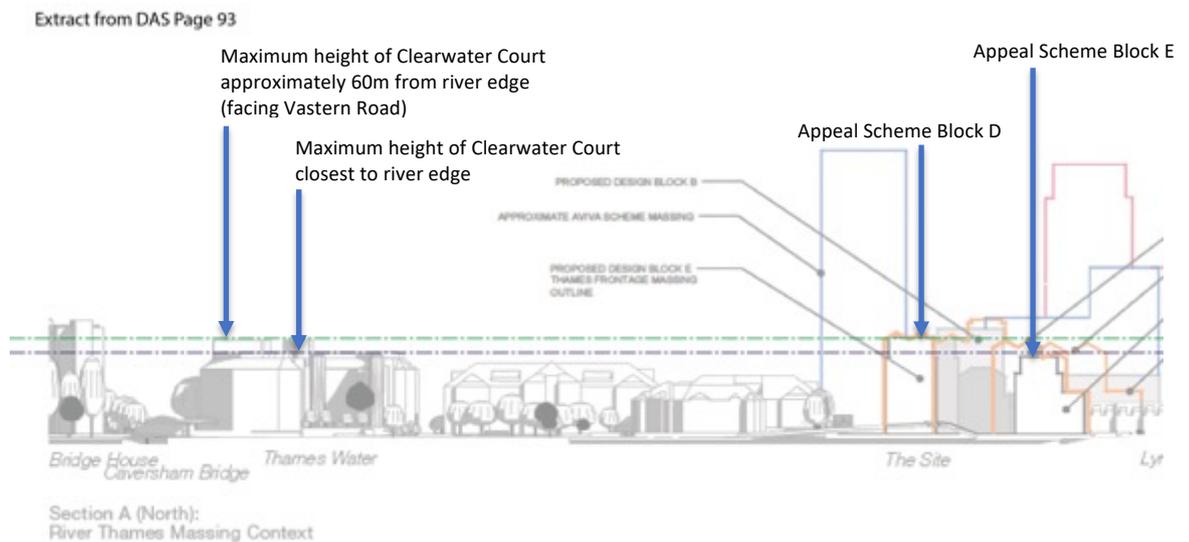


Figure 14 Extract from DAS page 93 - River Thames massing showing relative heights of Clearwater Court in relation to the Appeal Scheme (minus rooftop plant enclosures)

- 3.3.35 The building heights given in Mr Taylor's SoC Appendix 14 diagrams 'A' to 'I' (pages 85-93) are incorrect. Looking at DAS Figure Section A (North) 'River Massing Context' (Page 93), I see that the projecting wings of Clearwater Court (which Mr Taylor gives as 31.2m in his SoC) are considerably lower than proposed Block D (which Mr Taylor's SoC gives as 30.4m) and slightly taller than Block E (which Mr Taylor gives as 25.1m). Looking again at

the DAS Figure, I deduct Mr Taylor has taken the highest point of Clearwater Court closest to Vastern Road, some 60m from the river edge.

3.3.36 When representing the width of Blocks D and E, Mr Taylor adopts a different approach that is more helpful to his argument. He measures the building width in relation to the river parallel to the building frontage when it should be consistently measures parallel to the river edge and with the other riverside buildings.

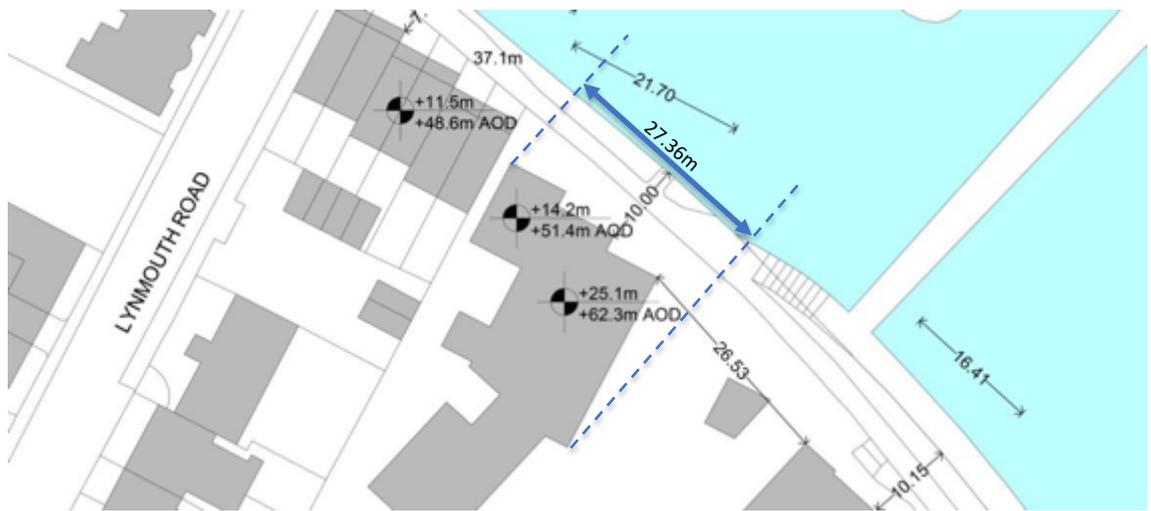


Figure 15 Analysis of Fig. D (Page 88) of SoC Design Appendix 14

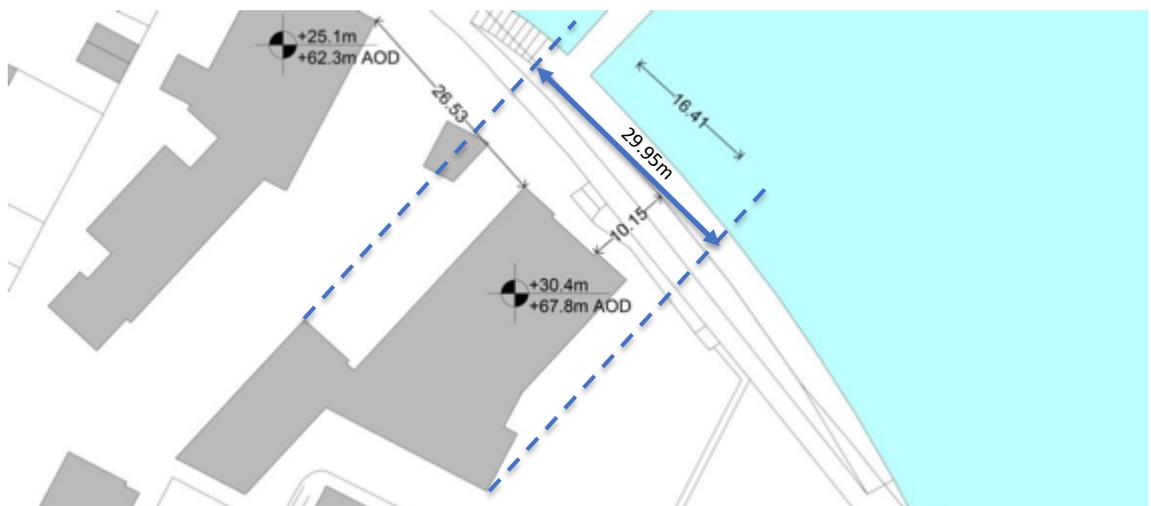


Figure 16 Analysis of Fig. E (Page 89) of SoC Design Appendix 14 using the same method as for Clearwater Court

3.3.37 Mr Taylor then breaks the methodological rigour of his assessment of frontage widths to claim Christchurch Wharf and Lynmouth Court would be read together '*given there is only a slight gap between the two buildings*'. He does not apply the same logic to

Thames Court and Norman Place (Soc Appendix 14 F and page 91-92) where there is also only a 'slight gap' between buildings that can only be seen obliquely from the riverside.

3.3.38 I disagree Mr Taylor's approach provide an objective basis for assessment (his PoE paras. 3.72 and 3.73). In this case, my Figure 18, which covers the entire riverside frontage from Caversham to Reading Bridges, is a far fairer basis for evaluation of riverside frontage widths, setbacks and open space when combined with the following adjusted table of Mr Taylor's figures (adjustments shown in red).

		Height of building relative to towpath	Distance from the river to building frontage	Height to width ratio	Width of publicly accessible space	Building frontage width
<b>A.</b>	Regents Riverside	15.6m	5.7m	2.7:1	4.0m	62.1m
<b>B</b>	Isis Court	13.2m	6.7m	2:1	3.8m	50.2m
<b>C</b>	Lynmouth Court	11.5m	7.1m	1.6:1	4.9m	25.2m
<b>D</b>	Christchurch Wharf (Block EFG)	14.2-25.1	10.0m	1.4-2.5:1	9.70m (10.0m)	27.36m (21.7m)
<b>E</b>	The Turbine Hall (Block D)	30.4m**	10.2	3:1	10.2m	29.95m (16.4m)
<b>F</b>	Thames Court	17.6m	7.2m	2.5:1	3.8m	40.7m
<b>G</b>	Norman Place	22.7m	24.9m	0.9:1	5.7m	65.3m
<b>Ha</b>	Clearwater Court (East Wing)	26.1 (31.2m) *	(7.2m)	3.6:1 (4.3:1)	5.1m	33.9m (67.8m)***
<b>Hb</b>	Clearwater Court (West Wing)	26.1 (31.2m) *	23m (7.2m)	1.1:1 (4.3:1)	5.1m	33.9m (67.8m)***
<b>I</b>	Reading Bridge House	37.2m	14.3m	2.6:1	3.9m	14.8m

\* Adjusted height figures based on DAS Figure 'Thames Massing, page 93(Mr Taylor's figures in brackets).

\*\*Excluding rooftop plant enclosure c.2.5m

\*\*\* Mr Taylor's figure divided by two.

3.3.39 Mr Taylor has not achieved what he says at 3.72 i.e. demonstrated that the appeal building heights in relation to their setbacks from the river and gaps between built form, are comparable to existing buildings along this stretch of river.

3.3.40 Mr Taylor has still not addressed my main point -I can see no 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 (3.15.3).

3.3.41 The relationship of the appeal buildings D and E – tall Thameside buildings (twice the RSAF indication) with wide built frontages and narrow gaps between close to the riverbank – is not replicated elsewhere along the relevant stretch of river. This is harmful to the river setting as a whole - because it does not respond to the sensitive

context of the meadows and the remainder of the riverside strip-where no major change is planned or proposed.

**Setbacks (paras. 3.76-3.81)**

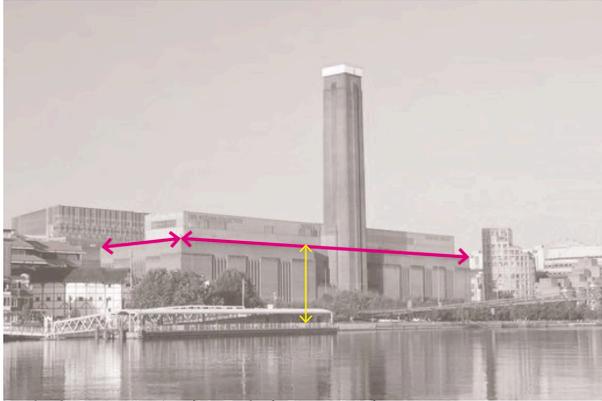
*Paragraphs 3.76-3.99 and Figures 3.29 and 3.30*

- 3.3.42 Blocks D and E are too tall in relation to the riverside and set too close to the riverside path.
- 3.3.43 Mr Taylor (para. 3.78) explains how the appeal scheme has been designed with the Turbine Hall (block D) presenting a narrow frontage onto the river, with a deeper return into the site, thereby following the principles of a power station typology. His Figures 3.29 and 3.30 seek to explain how setting back Block E from the riverside will disrupt the building's proportions and produce a square rather than rectilinear plan that will result in the loss of the '*power station typology*'.
- 3.3.44 I have already questioned the appropriateness and application of the 1930's power station typology on this site (3.4.9/ Rebuttal of Mr Taylor's para. 3.66). It is a monolithic form and imported and therefore alien to the history and heritage of the site. In any case, Block D only superficially adopts the facade details and modelling devices of 1930's art deco power stations, cinemas, factories and rail and tube stations.
- 3.3.45 I disagree with Mr Taylor that Block D exhibits the proportions and silhouette of the power station typology that would be eroded or lost if the building was pushed back.
- 3.3.46 Mr Taylor's Figures 3.27 and 3.28 examine the proportions of Battersea and Bankside. I immediately notice that the typology relies upon the interplay of two volumes, the chimney(s), and the turbine hall. Without the interplay of the two volumes, the silhouette of the turbine halls would be far less distinct, as is the case with the Appeal Scheme Block D.
- 3.3.47 Mr Taylor provides the 'x' and 'y' dimensions of the two stations at Figs. 3.27 and 3.28. He omits the heights of the main turbine hall volumes (see Figure 17 below). In my view, the height to width ratios of the two historic stations result in lower and longer turbine halls, whereas the height of the Appeal Scheme Block D in Fig 3.29 is greater in

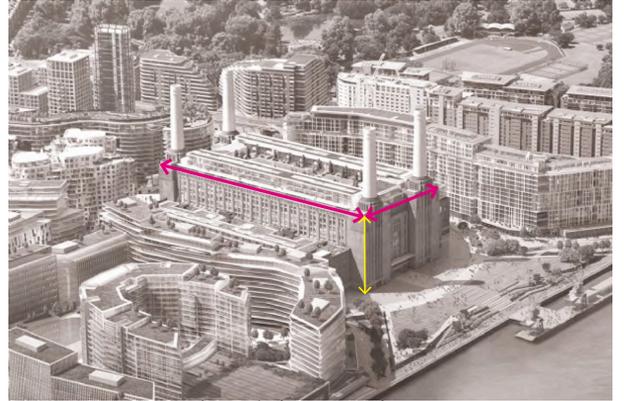
proportion to the longer façade. Block D does not emulate the proportions of either Battersea or Bankside, as Mr Taylor claims.

3.3.48 Finally, referring to my earlier points on 1930's power stations, the most appropriate power station typology to which Mr Taylor could have drawn was the Edwardian Vastern Road Electric Power Station (the two middle images at Figure 17 below).

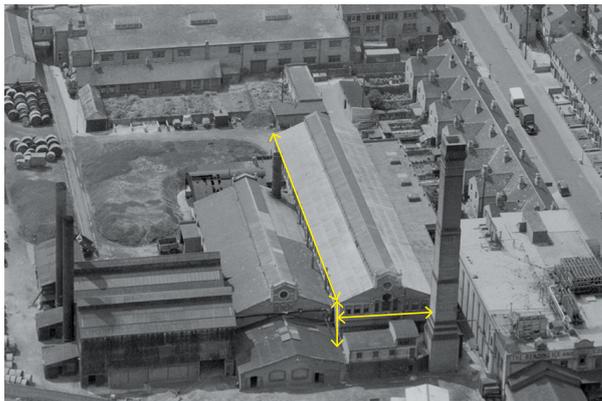
3.3.49 Turning to Mr Taylor's Figure 3.30, I observe that the additional setback results in a far more satisfactory relationship between building heights, proximity to the riverside and the immediate setting of Christchurch Bridge and adjacent riverside development. Fig. 3.30 demonstrates ample scope for a better balance between height and setbacks at the riverside.



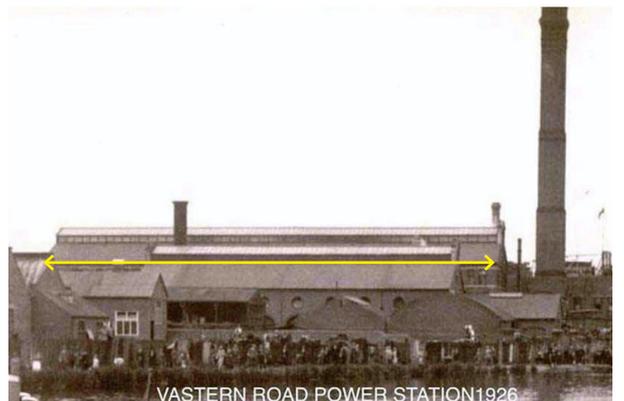
Bankside Power Station (Mr Taylor's Figure 3.27)



Battersea Power Station (Mr Taylor's Figure 3.28)



Reading Power Station



VASTERN ROAD POWER STATION 1926  
Reading Power Station



Lots Road Power Station



Mr Taylor's Figure 3.29 (Appeal Scheme)

Figure 17 Assessment of the relative scale, proportions, and forms of power stations

3.3.50 My Figure 18 shows the historic power station footprint of 1932 laid over the Appeal Scheme. I note that the historic station was generally set further back from the riverside.

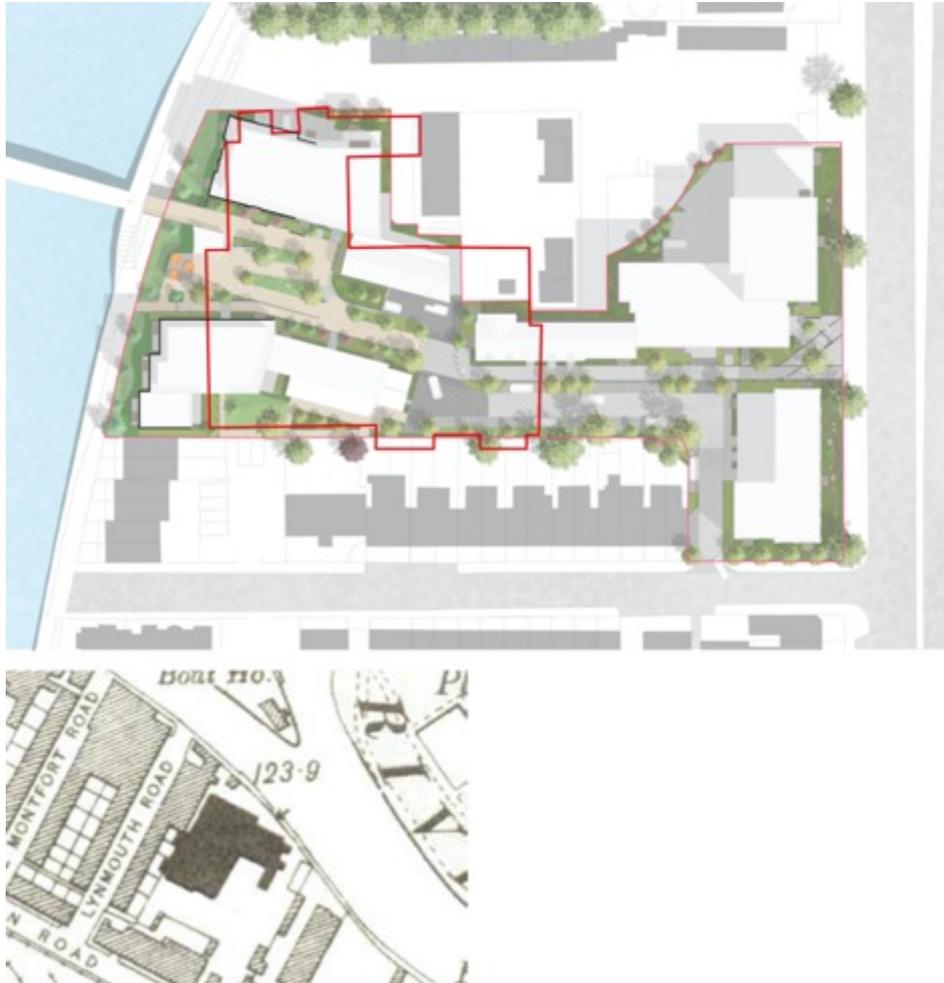


Figure 18 The Reading Power Station footprint of 1932 overlaid on the Appeal Scheme (red line) showing how this was set further back from the river (images extracted from DAS)

3.3.51 My Figure 19 shows that the detailed and elegant main power station buildings were designed to be viewed from and present a public face to the river. It follows that the setbacks shown in Figure 15 are the result of deliberate design decisions by the Architect, Frederick William Arbury.



Figure 19 The Reading Power Station river frontage showing how the original boiler house (left) and dynamo hall (right) elevations to the river were elegantly detailed (image extracted from DAS).

*Paragraph 3.80*

3.3.52 I welcome MR Taylor’s acknowledgement that the proposals come within 10m of the top of the riverbank. Mr Taylor correctly points out that policy EN11 states that this should be “wherever practicable and appropriate”. However, I can see no justification of the practicability and appropriateness, only an explanation that the breach is minimal (also points to Mr Taylors para.3.88 below).

3.3.53 Mr Taylor argues ‘the proposals generally more than comply with the 10m requirement’ because other parts of the site are set further back. The proposals will only ‘*generally comply*’ with policy where they are setback further than 10m, or a satisfactory justification in terms of practicability and appropriateness is provided: Mr Taylor

provides neither. Mr Taylor's s PoE Appendices demonstrate that building setbacks are practical and appropriate (to comply with policy on ecological impact).

- 3.3.54 Blocks D fails to achieve a successful relationship with the river in terms of the setback. It does not embody the volumetric quality of a 1930's power station turbine hall nor does it follow from the historic layout of the site of the earlier power station on the appeal site. Setting block D further back and reducing the height will result in a far more satisfactory relationship with the river and towpath.

**North-South Link and Riverside Open Space (paras. 3.82-3.85)**

- 3.3.55 Mr Taylor misconstrues my position at 3.82. Redevelopment of the Appeal Site will bring many benefits and leaving the site undeveloped in the long term is undesirable. That does not mean any scheme will do. The harms the LPA identified are spelt out in the LPA reasons for refusal.

- 3.3.56 Mr Taylor's claims on the openness of the frontage to the river are undermined by errors in his assessment at SoC Appendix 14 Design Appendix A - Relationships to the River Thames. The riverside building s heights and setbacks proposed in the Appeal Scheme do not follow from nearby examples. They set a new, harmful, and therefore unwelcome precedent.

**RfR 6 – Comprehensive Development (paras 3.118-3.119)**

**Assessment of the Illustrative Comprehensive Development Scheme (paras. 3.120)**

***Paragraph 3.120***

- 3.3.57 I respond to Mr Taylor's numbered points at 3.3.59 below.
- 3.3.58 I must first emphasise that Mr Taylor is only now answering basic questions about the comprehensive development of the Allocated site. This brings him to the conclusion that there is an alternative outline approach that he has still not provided, which would begin to provide answers to some fundamental, high-level questions about the approach to the comprehensive development of the Allocated Site as a whole. There is no suggestion that a detailed design needs to be drawn up to clarify these matters and to answers to my points below.

*Point 1*

3.3.59 Mr Taylor disagrees with my point that proposed Block D prevents dwellings on the remaining SSE site from being positioned at the river frontage with views over the river and therefore hampers the future economic development of that site. However, his point three simply confirms that he considers the position of Block D is appropriate and the SSE site river frontage should therefore be laid out as a route to the towpath. In effect. He confirms that Block D blights the SSE site river frontage.

*Point 2*

3.3.60 It is the length of Block D and the position of windows and balconies at the east face, rather than the block's orientation with the bridge, that restricts potential development on the SSE river frontage. If Block D was set back and the length reduced (see Mr Taylor's Figure 3.30 page 44), greater development potential would be released on the SSE site river frontage.



Figure 20 Potential riverfront and river-facing development on the SSE site (blue line)

*Point 3*

3.3.61 I agree with Mr Taylor that boundary trees restrict development along the eastern edge of the site. However, he confirms a 13m built frontage to the SSE site is feasible. This would allow two apartments per floor each with a generous 7.5 m river frontage.

Assuming the block rises to five or six residential storeys, this would provide ten to twelve dwellings with a gateway to the riverside at ground level.

- 3.3.62 Mr Taylor is wrong to say the appeal site has not captured the value of the river frontage - because this would require the omission of windows and balconies along part of the east face of Block D to allow a future development of a riverside block on the SSE site.

*Point 4*

- 3.3.63 Mr Taylor confirms the footprints shown on his comprehensive plan are constrained because they must be predominantly single aspect dwellings. It is not correct for Mr Taylor to claim the Appeal Scheme must be single aspect to satisfy the technical constraints imposed by the SSE equipment. That is the case in some but not all instances- and a result of the Appeal Scheme positioning buildings as close as possible to the boundary. The single aspect blocks in the Appeal Scheme require the development of the SSE site to come forward in a less efficient form to mitigate the visual impact of tall, blank facades.

*Point 5*

- 3.3.64 Mr Taylor misses my point that the Appeal Scheme presents tall, (predominantly) blank facades facing onto the SSE site. The proposed development of the SSE site will need to limit this visual impact, for example, by buildings rising to similar heights extruded from small footprints positioned against the boundary. This constraint on the SSE arises from the Appeal Scheme layout. This places an additional constraint on the comprehensive developmental the SSE site and limits the potential for a viable development that realises the full potential of the site.

*Point 6*

- 3.3.65 This states that, *“Also, this assumption presumes the adjoining site would only come forward in the exact form as the comprehensive sketch. There would be alternatives, if one deleted the north-south link, for example.”* It is incumbent on the applicant to demonstrate that a comprehensive approach can be achieved. Mr Taylor’s case is that other, better options (described by words, not plans) will resolve the main concerns

raised. If the Appellant had presented such thinking on integrated development of the whole site, in outline plan form, then RfR 6 would not be an issue at this appeal.

3.3.66 Cllr. Page's comments at committee (SoC 2.4) is highly relevant to the effect '*we are presented with a one-page sketch showing a very high-level possible approach which doesn't itself demonstrate satisfactory comprehensive development*'. Mr Taylor tells us that there are other basic options, but we have not been provided with these at the application stage, and nor are we provided with them now.

*Point 7*

3.3.67 Mr Taylor confirms my point that the ratio of dwellings per floor to the number of lift and stair cores is a cost and viability issue. He argues that the Appeal Scheme achieves this viably and assumes this will be so for the SSE Site. However, his comprehensive plan shows a low-density development with no riverfront apartments that appears unlikely to yield a similar return to the Appeal Scheme- particularly where the cost of relocating electrical equipment may need to be borne.

3.3.68 Mr Taylor's sketch comprehensive plan does not detail how access from the Appeal Site can be provided.

*Point 8*

3.3.69 Mr Taylor misses my point that the podium/undercroft in the Appeal Scheme- that so much effort has been expended in detailing and landscaping in the vicinity of the switchback ramp- results in dead ground floor level frontage facing the SSE site to the rear. The development of the SSE site must somehow resolve the fact this dead car park frontages faces onto a potential public route and the Appellant's comprehensive sketch laves the conflict unresolved.

*Point 9*

3.3.70 Mr Taylor discusses options that have not been explored in his comprehensive planning exercise.

3.3.71 I believe Mr Taylor is suggesting the SSE site can deliver an alternative or secondary north-south link and line of sight that would in some way compensate for a shortcoming

in the Appeal Proposals. That places a further requirement on the SSE site to the benefit of the Appeal Scheme.

*Point 10*

3.3.72 Mr Taylor confirms that further details (a '*slight adjustments to the plan*') are needed to demonstrate the SSE can be efficiently developed. The LPA's case is that such details were not submitted at the application stage, the basis for RfR 6. And they have not been provided by the Appellant during this appeal. To provide such details at the Appeal stage would of course suggest they were needed but missing from the application before the committee.

*Point 11*

3.3.73 Mr Taylor confirms his comprehensive plan relies on a preponderance of single aspect buildings. Single aspect dwellings typically enjoy lower natural light levels and may require mechanical ventilation.

*Point 12*

3.3.74 I note Mr Taylor's explanation of the need for a minimum 2m setback on the Appeal Site to create a '*scaffold zone*'. This would be of little or no future utility where the SSE site came forward for development other than the construction phase (and only where the Appellant agrees). This minimal benefit does not offset or mitigate the Appeal Scheme constraints on the development of the SSE site.

*Point 13*

3.3.75 I agree with Mr Taylor that there will be some building frontages facing the potential new link. However, I cannot see that the quality and form of this key link has been considered as a whole- because it will border the dead frontage of the ground floor rear parking area of Blocks D breaching CR11(iii).

*Point 14*

3.3.76 Mr Taylor's comprehensive plan does not show the details he describes, which are directly relevant to any consideration of the integrated development of the two sites. Mr Taylor seems to confirm that the gap is only sufficient to permit shared-surface pedestrian and emergency vehicle access when my point was about general vehicular access.

*Point 15*

- 3.3.77 Mr Taylor's comprehensive plan does not demonstrate how the Vastern Road frontage can be better configured.

**North-South Route (paras. 3.122-3.123)**

*Paragraph 3.123*

- 3.3.78 This states that "Policy CR11ii does seek north-south links (plural)." This is in the context of the wider Major Opportunity Area, not on this individual site. Figure 5.3 of the Local Plan shows two north-south links south of the station, but only one through this site.

**Locally Listed Building (paras. 3.124-3.125)**

- 3.3.79 I refer to the LPA witness on locally listed building matters.

- 3.3.80 In response to Mr Taylor's point at 3.125, I fail to see how the locally listed building cannot be successfully integrated into the scheme.

**Paragraphs 3.126-3.128**

- 3.3.81 Regarding Mr Taylor's points on plot ratios, it is worth pointing out that the references in my Statement of Case to the HELAA are that the plot ratio of 43% is a useful benchmark for town centre developments, not a policy requirement. Whilst it is noted that the Appeal scheme achieves a 42% plot ratio and therefore this part of the allocated site (not the whole site) therefore could be said to represent an efficient use of land, it is not the case as stated by Mr Taylor in paragraph 3.128 that a reduction below this level would therefore represent an inefficient use of land, particularly where it is to achieve compliance with policy on matters as significant as a high quality north-south link, which, as paragraph 5.4.6 of the Local Plan reminds us, is the "main priority for the site".

- 3.3.82 Mr Taylor indicates in paragraph 3.127 that the illustrative sketch provided in the DAS is not a detailed and thorough assessment of the site, and that changes could be made, for example the north-south link could be removed to enable a denser development. As I note above in paragraph 3.4.58, it is incumbent on the applicant to demonstrate that a comprehensive approach can be achieved, but illustrative plans showing a comprehensive development that secures an efficient use of land have not been provided.

3.3.83

### Summary of the Potential Loss of Dwellings (including appended diagrams/plans) (3.132)

3.3.84 The basis for the calculation of the loss of dwellings at para. 3.132 and 3.133 are set out in the Appendices to Mr Taylor's PoE. These cannot be presented as 'losses' because the Appellant has not brought forward a scheme that is compliant with policy and guidance.

3.3.85 I note RfR 1 (point 1) is based on a '*Nett loss of dwellings to provide a direct line-of-sight between Vastern*' when the Appellant's case is that it is not possible to provide a direct line of sight.

## 3.4 Appendices A-C

### Appendix A-C

Appendix A Assessment of Doyle Scheme Sk-03 (pages 70-72), Appendix B – Assessment of Doyle Scheme Sk-04 (pages 74-76) and Appendix C – Assessment of Doyle Scheme Sk-07 (pages 78-80)

3.4.1 The sketches demonstrate how a direct line of sight from Vastern Road to the riverside is possible with relatively minor adjustments to the appeal scheme. This arrangement , commies with policy and guidance whereas the Appeal Scheme visually aligns with the river only after travelling halfway through the Appeal Site towards the River.

3.4.2 Mr Taylor's Figures (Ap 1 Ap2, Ap 4, Ap 5 Ap 7 Ap 8) extrude the alignments in SK-03,4 and 7 across the sites on the south side of Vastern Road before and after planned development. In my view, if it cranks at all, alignment should crank at Vastern Road - with east-west connectivity - and align with the station/station square. The Aviva/Reading Station Park planning application layout would adjust to fit.

3.4.3 My PoE (Figs. 31 and 32) examines the potential for a direct line of sight from the station to the river without any crank, which the Appellant argues is impractical.

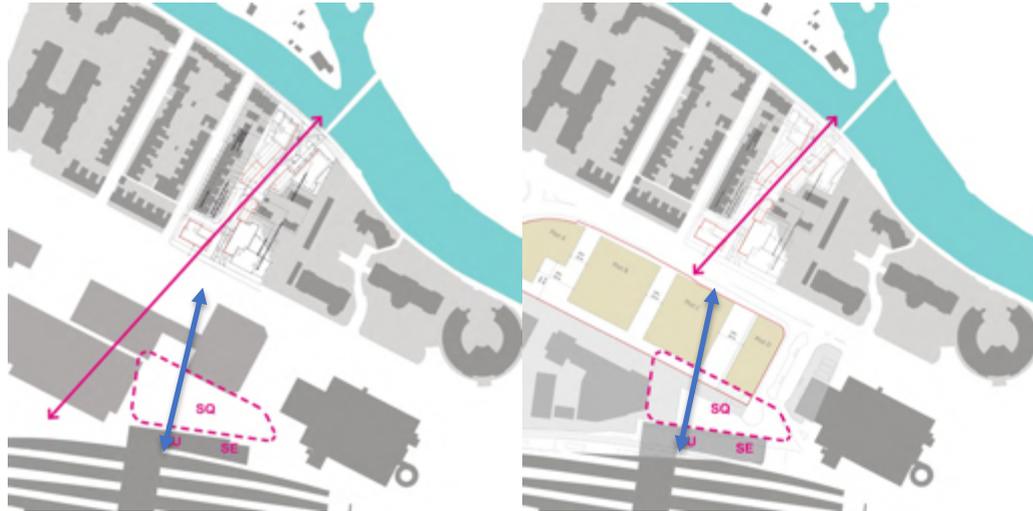


Figure 21 Mr Taylor's Fig Ap1 and Ap 2 with alternative alignments marked

3.4.4

Mr Taylor provides marked up annotated versions of SK-034 and 7. These repeat points, and I have responded to the numbered points at SK-03.

- (1) His comments on the directness of the serpentine ramp are addressed above. The layout shown would accommodate the Appellant's switchback ramp arrangement.
- (2) The serpentine ramp layout can be widened to 4m (see Appendix RA)
- (3) The serpentine ramp provides landings and changes in direction that strike a balance between a direct route with no landings (the northside bridge approach ramp) whilst avoiding the limitation of the Appellant's switchback ramp arrangement.
- (4) The ramp down to the towpath is not altered from the Appeal Scheme, and the sketch does not explore alternatives. It is for the Appellant to justify what is shown. Appendix A shows a path down to the river at a gradient of 1:21 (i.e., it is not classified as a ramp at all).
- (5) The café and terrace are a desirable feature, but it does not need to be provided in this arrangement in this position. The Appeal Scheme offers the best view of the river from a semi-private café terrace for café patrons.
- (6) The visual alignment is to the river. The sketch will reveal a view of the bridge mast at the same point as the Appeal Scheme.

- (7) The cranked form of block B shown reflects the Appellant's scheme, which I do not support. It is for the Appellant to present the case for the merits of this arrangement, which I criticize above.
- (8) I have outlined alternatives to the Appellant's preferred option of a buildings to act as a visual and acoustic barrier (e.g., Figure 10 Extract from DAS (page 72) showing green wall and potential visual and acoustic screen.). In any case, the Appeal Scheme also leaves a gap between blocks C and D adjacent to the electrical equipment.
- (9) The reduction in unit numbers can only be considered a 'loss' where the Appeal Scheme is generally compliant with policy and guidance: It is not.
- (10) The building layout can be adjusted if necessary to minimize any incursion into the tree root protection area. Rear boundary wall foundations to Lynmouth Road dwellings are likely to restrict root development in the manner shown.
- (11) Potential amenity impacts can be minimized by low rise (two-storey) single aspect dwellings.
- (12) The DAS (page 72) shows a curving brick wall exemplar. The radius shown on SKo3 is much tighter but still perfectly capable of being formed in brick.



Figure 22 Example of curved brickwork from Appellant's DAS (page 72)



Figure 23 Example of curved brickwork

- (13) The building would need to be set back 2m from the boundary to meet the 2m setback guideline, although it is not clear if this is an absolute requirement.
- (14) The building opposite No.14 on the plan would need to be set back to achieve the Appellant's proposed approach to access and servicing. As drawn in SK03, vehicles may need to reverse over the NS link alignment.

## 4 Planning

4.1.1 Town Planning Proof of Evidence of Kim Cohen ('Mrs Cohen').

### 4.2 4.0 Response to the LPA's Statement of Case

#### Reason for Refusal 1 (4.2-4.25)

- 4.2.1 Mrs Cohen (4.3) refers to Mr Markwell's Soc (paragraph 6.10) on the quality of the north-south route. Mr Markwell's references to '*not strategic, 'a weak link', and 'throttle the proper functioning of the route'*' are taken from my SoC Ch. 2.9- The Strategic Importance of the North-South Link.
- 4.2.2 Mrs Cohen claims there is no reference to a '*strategic link*' in the Local Plan or RSAF. This is correct. However, I do not refer to it as a strategic link: I say it is '*strategic in nature*' (MD Soc 2.9.2) and, after that, carefully reference the basis of my claim<sup>12</sup>
- 4.2.3 Local Plan Paragraph 5.2.1. sets out key principles for the town centre, one of which (g) references foot and cycle access '*particularly in a north-south direction through the core*'. Paragraph 5.2.3 states that '*Emphasising a north-south link through the centre will help to link the centre to the Thames and its adjacent parks, to Caversham and the rest of Reading*'. For the Station/River Major Opportunity Area, CR11 (ii) states that '*North-south links through the area centred on the new station, including across the IDR, are of particular importance*'. Meanwhile, paragraph 5.3.6 states that '*In terms of permeability, improving links for pedestrians and cyclists through the centre, particularly in a north-south direction, is one of the key principles for the spatial strategy of the centre, along with removing barriers to access within the centre*'. It also states that '*In particular, on the Riverside site (CR11g), achieving this north-south link is the main priority for the site, and this should be given substantial weight in development management*'. Meanwhile, paragraph 5.9 of the RSAF refers to this as a '*major city spine*'.

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<sup>12</sup> 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

4.2.4 The north-south link is ‘*major city spine*’, a ‘*key principle*’, a ‘*main priority*’, of ‘*substantial weight*’ and ‘*particular importance*’. I, therefore, cannot see how Mrs Cohen can dispute the fact that the north-south link is strategic in nature. It is ‘strategic’ because it is central to the strategy for Central Reading and the Station/River MOA in the Local Plan.

4.2.5 The Appellant’s SoC Appendix 12 (para. 5.9) acknowledges the ‘*strategically important landscaped link between the station and the river*’. The Appellant’s note of a pre-application meeting of 14<sup>th</sup> September 2020 at section 2.1 (referring to 4.1 of the RSAF) points to a ‘*strategic-scale key corridor of movement which passes through the Site*’.

4.2.6 In my view, Mrs Cohen is seeking to diminish or demote the strategic importance of the north-south link, contrary to policy and guidance. This can only be interpreted as an attempt to lower the standard against which the quality and suitability of the north-south link should be judged (directness, line of sight, width, gradient etc.).

#### Paragraph 4.7

4.2.7 Mrs Cohen mistakenly claims: ‘*There is no development plan policy basis for requiring a visual link with no reference within policy wording to a visual link or unbroken line of sight being required*’ (para.4.7).

4.2.8 It would be correct to state there are no specific references to a visual link or unbroken line of sight in the Local Plan, but that is not where we should expect to find them. The Plan sets out a clear vision and expectations (NPPF para. 127) with maximum clarity about design expectations set out in the RSAF, a local design guide or code (NPPF para. 128).

4.2.9 The Local Plan (along with NPPF paras.237-129, the RSAF, NDG and NMDC) provides a clear basis for requiring a visual link and unbroken line of sight.

#### Paragraph 4.8

4.2.10 Mrs Cohen accepts the RSAF has ‘*some weight as a material consideration*’ but makes various claims about its status. She states it is not development plan policy, not a development plan document or adopted masterplan for the north-south route and does not reflect the up-to-date situation on the ground. Her paragraph 4.8 also states, “not

only because the RSAF is not policy” – the RSAF is policy. It is not development plan policy, but it is policy.

4.2.11 NPPF para. 134 is clear that local design guidance, such as the RSAF, should be taken into account when considering whether development reflects local design policies and, where local guidance is government guidance on design. National documents (NDG, NMDC) should also be used to guide decisions on applications (para. 129).

4.2.12 Mrs Cohen claims the RSAF no longer represents the situation on the ground. It is unclear what she is referring to.

- Apart from a change in ownership of part of the Allocated Site (C11g), there have been no other material changes. Its future subdivision and incremental development are material considerations in this Appeal.
- The redevelopment of the SSE site accords with current policy and guidance. Its future development has not been ruled out, even if this is unlikely in the near term.
- The RSAF already anticipates the incremental or phased redevelopment and subdivision of sites (RSAF 13.1).
- Christchurch Bridge has been constructed in accordance with the RSAF.
- Consent has not yet been granted to develop the sites to the south across Vastern Road (e.g., Reading Station Park/Aviva). There is no suggestion this will proceed other than in accordance with the RSAF.
- The Station redevelopment and northern interchange have been completed in accordance with and in the forms described in the RSAF.

4.2.13 I see no basis for Mrs Cohen’s claim the RSAF no longer represents the situation on the ground. I take the opposite view that development has proceeded in accordance with the RSAF, which continues to guide the development of the Station Area effectively.

#### Paragraph 4.9

4.2.14 Mrs Cohen claims RBC’s case regarding where a line of sight is sought is inconsistent. I disagree. RBC witnesses have carefully introduced, interpreted, and applied relevant

policies and guidelines in the Local Plan, the RSAF, the NDG and NMDC. The Appellant's case is based on a selective reading.

4.2.15 Mrs Cohen mistakenly claims CR11g does not specify a location for new public space within the site (The origin/focus for a line of sight to/from the Station Square -views 62 and 63 and the text at RSAF para7.10). This is not correct. CR11g refers to '*an area of open space **at the riverside***' (my emphasis). Mrs Cohen seems to suggest that because CR11g refers to this as a '*potential*' open space, then RSAF 7.10 can be set aside. The Appeal Scheme provides a riverside open space in accordance with CR11g, so its potential has become the actuality.

4.2.16 Mrs Cohen refers to RSAF Figure 7.2 to claim '*there is no reference to an unbroken line of sight between those two points*' (the Station Square and Riverside Open Space). She ignores the associated text at 7.10. This confirms: '*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*'. There are only two '*views being opened up with the Station Area itself*' of particular significance (*para. 7.10*): Nos. 62 (Station Square north looking north) and 63(New public space on the Thames looking south).

4.2.17 Mrs Cohen approach is to try to break apart the sentences at RSAF para. 7.10 and break the link with the associated figure 7.2 (shorter distance views) and the list of new views given in the table.

#### Paragraph 4.10

4.2.18 The Appellant's case has shifted on the practicality of an unbroken line of sight between the station and the River. The Appellant's original claim was that the alignment was impracticable. The LPA's evidence has now clearly demonstrated this is practical. The Appellant now relies on levels (vertical alignment) to maintain that the visual link is impractical.

4.2.19 Mrs Cohen introduces a new construct to shift the focus of the Appellant's argument- that the purpose of the line of sight is to create a view of the water surface of the Thames. This opens a semantic debate about the meaning and application of terms in

policy and guidance to the '*River Thames*', 'the Riverside' and '*Thames side*' and '*between the Station and the Thames*'.

#### Paragraph 4.11

- 4.2.20 RBC has not accepted that a clear line of sight is unachievable, contrary to the claim here. The claim is based on the Planning Policy comments reproduced in paragraph 4.45 of the Committee Report, which states that, due to the subdivision of the site, a single line of sight will be '*very difficult to achieve*', not that it would be impossible. In any event I have demonstrated that it is not difficult to achieve.

#### Paragraph 4.12

- 4.2.21 Mrs Cohen claims '*immovable constraints*' prevent a straight route and rebuts RBC's claim that proposed buildings have been intentionally positioned to terminate sight lines' (Mr Markwell paragraph 6.14).
- 4.2.22 The LPA has demonstrated a direct route is possible, and the '*immovable constraints*' do not prevent this, which the Appellant now seems to accept.
- 4.2.23 The Appellant's DAS and the Design Principles that have guided the Appeal Scheme (para. 3.1) include '*11. Use of buildings to deflect vistas and define the public route*'. It is, therefore, a matter of fact that the Appellant's design intention was to position buildings to terminate sightlines.

#### Paragraph 4.20

- 4.2.24 This states that my SoC defines quality as including directness, visual links, width, and landscape and says that there is no policy basis for this. However, these matters relate directly to the points made in the Planning Policy response as set out in the Committee Report, which clearly lists the policy lineage of each requirement. The policy requirements for all these elements are very clear.

### Reason for Refusal 6 (4.35,4.82-4.93)

#### Reason for Refusal 6

#### 4.83

- 4.2.25 There are many stages between the minimal illustrative diagram submitted to demonstrate comprehensiveness (which does not show a development that helps

achieve a comprehensive policy-compliant approach) and the type of detailed design that the Appellant mistakenly infers the LPA requires, e.g. (para. 4.84).

- 4.2.26 The test of what is sufficient is that enough information is provided to demonstrate that the Appeal scheme can come forward as part of a comprehensive approach and, if the appeal is permitted, this would enable the remainder of the SSE site to come forward and comply with the policy requirements of CR11g. This was not done for the application; and it has not been done on the appeal. This is despite the fragments of explanations and vague alternative options now being described by Mr Taylor for the first time.

#### Paragraph 4.88

- 4.2.27 The CR11g Allocated Site is greater than 1 hectare. If the entire Allocated Site were to come forward for development, as initially proposed by the owner SSE and discussed with the LPA, CR3 would be fully engaged. The Appeal site is less than 1 ha. and therefore, this part of policy CR3 (not the whole policy) does not apply, but it is relevant to the comprehensiveness of the broader allocation, which does exceed 1 ha.

- 4.2.28 This is a straightforward example of how piecemeal development fails to realise the full benefits of the comprehensive approach required by policy and guidance. The Appellant claims that the extent and configuration of the proposed public realm is necessarily limited by the 'immovable constraint' of the site boundary that falls below the CR3 site area threshold, so the policy is not fully engaged. Any future developer of the SSE site will want to make the same case.

#### Paragraph 4.93

- 4.2.29 Mrs Cohen states that '*in reality*', the SSE site will not become available for development for a considerable length of time, if at all. I am advised the Appeal Correspondence includes a statement of SSE's position. However, I continue to question why the development of the entire SSE site was proposed by SSE and details presented to the LPA before the sale of part of the site to the Appellant.

#### Trees (4.54-4.63)

Paragraph 4.62

- 4.2.30 The Appellant previously claimed the development was set back by at least 10m from the watercourse. They now accept the development is not set back by at least 10m from the river edge in all instances, and the fifth bullet of EN11 and CR11g are not met.
- 4.2.31 The Appellant has now provided a design exercise demonstrating potential setbacks (see Mr Taylor's Design PoE Appendix D). It is no barrier to creating a greater setback- only that this affects the total number of units, which can be weighed in the planning balance.
- 4.2.32 Mrs Cohen fails to acknowledge and give proper weight to the admission in the Appellant's Townscape and Visual Proof (para.3.96) that the number and type of trees have been limited by a desire to preserve the private amenity of views from proposed dwellings. Widening the riverside planting strip would offer greater potential to plant more trees, particularly large-canopy trees, whilst also offering views from proposed dwellings.

## 5 TRANSPORT

5.1.1 Mr Witchalls of Stantec ('Mr Witchalls').

### 5.2 5 North-South Link Rationale

#### Policy 5.1.

##### 5.1.4-5

5.2.1 Mr Witchalls refers to Paragraph 34 of the NMDC (Page 11 of the Guidance Notes for Design Codes), which he interprets as meaning that a '*relatively direct*' route may not be essentially a straight line between two points, but a route that offers a more direct route in comparison to an alternative, which is the case with the n-s link proposed. He claims (5.1.5) the proposals provide a new '*direct*' route to/from Christchurch Bridge and Reading Station, as envisaged by policy, and the route complies with the listed policies and standards.

5.2.2 Mr Witchalls correctly points to the term '*relatively direct*' at NMDC Guidance Notes Paragraph 34. However, this should be read alongside the Movement Chapter in the National Design Code (para. 58 page 29) part ii Active travel: '*New development should contribute to the creation of well-lit, direct and overlooked pedestrian and cycle routes*', which omits the qualifying term '*relatively*'.

5.2.3 NMDC Paragraph 34 relates to routes '*within large sites and into the surroundings*'. It properly applies to the Station/River/MOA rather than individual sites. Mr Witchalls' concept of a relatively direct route is by comparison with existing indirect routes. In my view, the proper interpretation flows from the second sentence of paragraph 34 - '*Following desire lines can help make routes clearer*'. In this case, the natural desire line is a straight line from the station to the bridge.

5.2.4 The NMDC and the qualifying term '*relatively*' clearly envisage cases where the natural desire line is less direct, for example, where the desire line skirts around rather than directly over a steep hill. In that case, it would be inappropriate to require a direct route over the hill, and the relatively direct route following the desire line around the hill would be appropriate.

## 5.3 5.3 Switchback ramp design

### 5.3.3

- 5.3.1 Mr Witchalls claims **any** design that removes the proposed switchback and replaces it with a straighter alignment would require ramps to extend further south into the site and disbenefit those accessing the ramp from properties in the northern areas of the site as well as those using the towpath (para. 5.3.3).
- 5.3.2 The serpentine ramp arrangement attached to my SoC (Figure 12) does not extend further south into the site than the switchback ramp arrangement. Mr Witchalls suggests this arrangement is inferior to the switchback ramp and raises various detailed criticisms, but there is no indication these cannot be resolved through design development. The sketch in Appendix RA shows the result of one such design exercise.
- 5.3.3 Even with an in-line ramp, the claimed disbenefits to those accessing the ramp from properties in the northern areas of the site and those using the towpath are less significant than Mr Witchalls infers. Figure 24 below shows that the route from the riverside and the entrance to Block E avoiding stairs is already long. The additional route length would therefore be less significant than Mr Witchalls suggests.

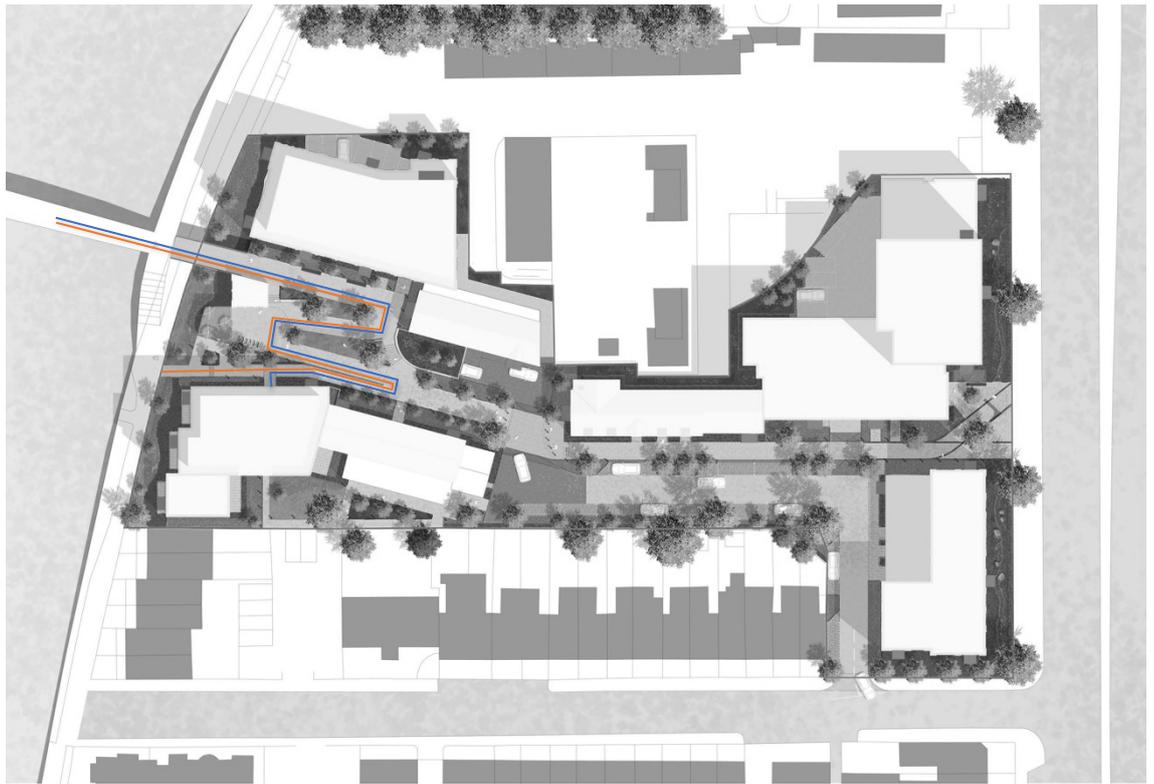


Figure 24 The route from the southern towpath (red) and from the entrance to Block E (blue) to Christchurch Bridge is neither short nor direct.

5.3.4 Ramp options were very carefully considered early in developing the Christchurch Bridge design, including switchback ramps.

#### 5.3.4

5.3.5 Mr Witchalls refers to several examples of switchback ramps in Reading.

5.3.6 Switchback ramps are rarely a preferred arrangement. They are typically specified where the ramp needs to rise to a considerable height, the available land is limited, and options for the ramp's start (bottom) and finish (top) are constrained. They are also specified where cost is the primary constraint.

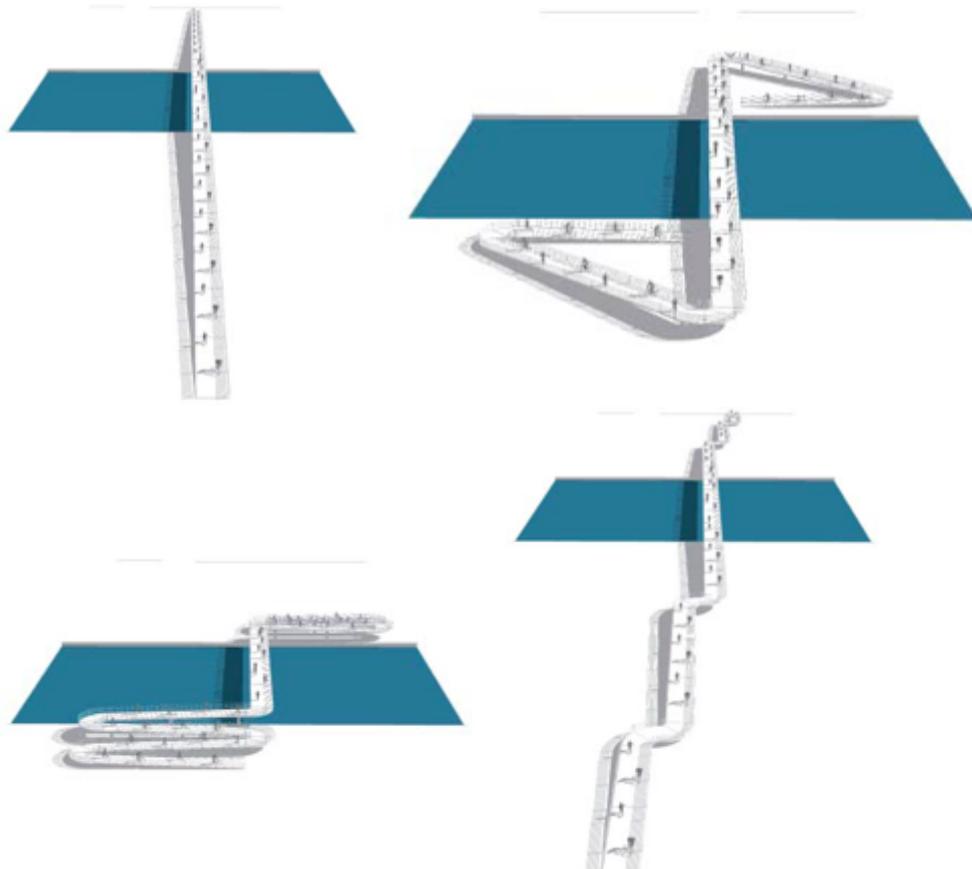


Figure 25 Extracts from the ramp alignment option development undertaken for Christchurch Bridge showing the in-line ramp, switchback, serpentine/offset and helical ramp arrangements.

- 5.3.7 Mr Withalls omits reference to the in-line ramp on the northern approach to Christchurch Bridge, which his practice helped design. A switchback ramp in this position would have been a cheaper option and, in some ways efficient, but entirely inappropriate. Mr Withalls argues the switchback ramp is necessary to slow cyclists on the southern approach but apparently unnecessary on the northern approach- where I am advised there are no reports of accidents.
- 5.3.8 Switchback ramps, even a single switchback section, will encourage some cyclists to seek alternatives. In the case of the Appeal Scheme, there is a clear and attractive off-path diagonal route across the strips of green space between ramp sections.

### 5.3.5

5.3.9 Mr Witchalls suggest the switchback ramp offers short ramp sections '*meaning cyclists will have sight of the full ramp while travelling along it*'. That, of course, is also the case with the serpentine arrangement. Mr Witchalls' Figure 5.2b shows a cyclist who must look 180 degrees over their left shoulder to have sight of another cyclist travelling down the ramp from the bridge.

5.3.10 Mr. Witchalls' Figure 5.2c and my Figure 29 Figure 29 The Appeal Scheme includes a 'blind bend' where the staircase beside the café meets cyclists travelling down from the bridge into the scheme. below shows how the top of the ramp presents a blind spot adjacent to the café where cyclists coming off the bridge and pedestrians walking up the stairs onto the ramp will have poor forward visibility and notice of one another.

5.3.11 I cannot see the basis for his claim that the switchback will maintain a sense of moving forward in the desired direction and not a feeling of doubling back.

## 5.4 Width of the NS Link

5.4.1 Mr Witchalls' Figure 5.3 shows an example of a 3m wide path for pedestrians and cyclists. This shows a level route in an open field with no edge restrictions. The railings, raised kerbs, level drops and adjacent shrub planting in the Appeal Scheme are not accounted for, and the example in his Figure 5.3 is, therefore, not directly comparable. The Figure below shows a mark-up of Mr Witchalls' Figure 5.2c and points to the '*real-world*' obstacles in the Appeal Scheme.



Figure 26 Examples of obstacles and restrictions along the route of the Appeal Scheme.

- 5.4.2 Notwithstanding the obstacles, the 3m route in Mr Witchalls' Figure 5.3 shows only two types of route user- non-disabled adult pedestrians and solo adult cyclists. The route would quickly become constricted even taking the scenario indicated, for example where two cyclists travelling in either direction meet an adult and a child walking side by side.
- 5.4.3 Mr Witchalls' comments on the width of the route do not take account of the fact the route shown a Figure 5.2c travels through the riverside public space where movements will not follow the simple, aligned, linear patterns commonly considered in transport planning exercises such as Figure 5.3.
- 5.4.4 The criss-cross movements of adults, children, pets, and café users within the Riverside open space will be complex and unpredictable. In this context, a route designed to minimum transport planning standards immediately adjoining lawns and café seating areas is likely to prove inadequate.
- 5.4.5 Mr Witchalls' case on width relies on the width of Christchurch Bridge for comparison at 5.4.6. I have looked back at the Design and Access Statement submitted with the planning application in 2013 and find the width was determined and justified on the following basis.

*Deck width*

*7.14. With reference to the transport report and Non-Motorised User Audit submitted with this application the following summer month weekday maximum peak hour predicted flows for the 2026 design year are identified for consideration in determining deck width:*

- *Pedestrians AM (Northbound) = 22/hr.*
- *Cyclists AM (Northbound) = 14/hr*
- *Pedestrians AM (Southbound) = 337/hr*
- *Cyclists AM (Southbound) = 54/hr*

*7.16. A review of relevant standards has determined that, other than the predicted maximum summer weekday peak hour, the predicted flows fall in the 'Low' flow*

*classification, for which the recommended minimum width is 3m.*

*7.17 The summer weekday maximum peak hour flow falls within the 'Medium' flow classification, which has a recommended minimum width of 4m.*

*7.18 This indicates that, on a pro-rata basis, a 3.5m width would satisfy the projected flows across the bridge at an intermediate classification between the upper and lower limits of the 'Medium' flow range. This is the minimum clear bridge width requirements therefore applied by the design team. It should be noted that any peak hour flows quoted above occur for small time period in relation to the overall time the bridge will be in use.*

5.4.6 Mr Wichalls (9.2.1) states a 3.0m wide shared path can accommodate up to 600 multimodal movements every hour (300 pedestrians and 300 cyclists) and, therefore, he believes the link will not throttle capacity. The DAS (for the original bridge application) indicates Christchurch Bridge would have been built at 4m wide based on expected summer weekday peak hours flows (with no allowance for pedestrians lingering on the bridge to enjoy the view). This was reduced to 3.5m because the peak summer weekday flow in relation to the overall time the bridge would be in use was considered lower. Notwithstanding, the DAS is crystal clear that 3.5m ***is the minimum clear bridge width requirement.***

5.4.7 The 3.5m path across the bridge reducing to a 3m minimum within the Appeal Scheme will inevitably have a throttling effect at the point of transition where pedestrians, cyclists and other users must negotiate who gives way and who goes first at peak times. This is likely to be exacerbated because the transition point is at one of the two bends in the switchback ramp adjacent to a building entrance and a set of external stairs.

## 5.5 Mr Doyle's - Alternative Scheme Options - Review

5.5.1 Mr Witchalls' critique of my alternative ramp designs (para. 5.5.2) points to easily addressed issues through more detailed design development. The attached sketch (Appendix RA) indicates simple remedies to the concerns he raises.

5.5.2 The sketches attached to my PoE set out to address alternate ramp configurations up to Christchurch Bridge and a direct north-south link with a direct line of sight. Mr Witchalls

mischaracterises their purpose and mistitles the sketches in Appendix H- BHOC turning head comparison with Mr Doyle's design.

5.5.3 Notwithstanding, taking his points in relation to vehicle manoeuvring, I attach the following sketch (Appendix RB) that addresses his concerns.

5.5.4 Mr Witchalls (6.3.9) mistakenly suggests my sketches showing the ramp down to the river remaining the same as the Appeal Scheme indicates either that I support the Appeal Scheme in this respect, or there are no alternatives. This is not the case. The attached sketch (Appendix RA) suggests an alternative ramps configuration made possible by the serpentine ramp compared with the switchback arrangement in the Appeal Scheme.

## 5.6 9 Summary of Evidence

### 9.2 Link width

5.6.1 I rebut conclusions in Mr Witchalls' Chapter 9.3 (para 9.3.1).

- The designs provide a shorter and straighter route than the Appeal Proposals. The cranks in the route always turn in the direction of the bridge and more closely follow the natural design line than any switchback arrangement (see appendix RA).
- I cannot see how the zigzag or serpentine arrangement with regular turns (Appendix RA shows 83 and 68 degrees) would encourage faster cycling. In any case, this is not a concern on the northern bridge approach ramp designed by Mr Witchalls' practice.

### Café visibility

5.6.2 The forward visibility around the café is easily remedied by adjusting the Café footprint. The Appeal Proposals also lack forward visibility in the vicinity of the café.

5.6.3 The Figure below shows how the footprint of the café is easily adjusted to improve sightlines.

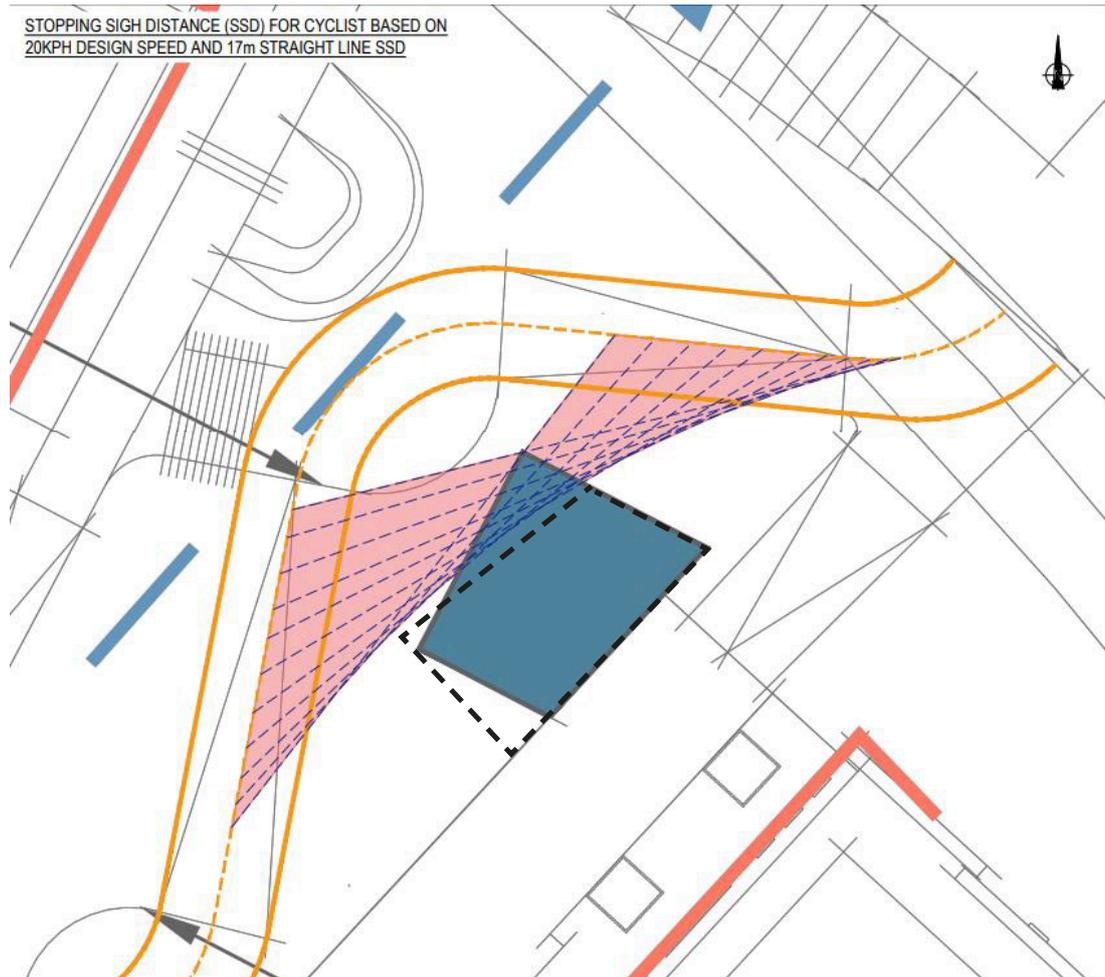


Figure 27 The footprint of the café can be adjusted (dashed black line) to open sightlines along the ramp.

- The Appeal Scheme appears to need longer runs of guard railing than shown in the illustrations. The drawing at Appendix RA shows a more generous 4m wide serpentine ramp.



Figure 28 The Appeal Scheme switchback ramp is bordered by retaining walls and steep, grassed embankments that appear to require guard railings, as shown in blue.

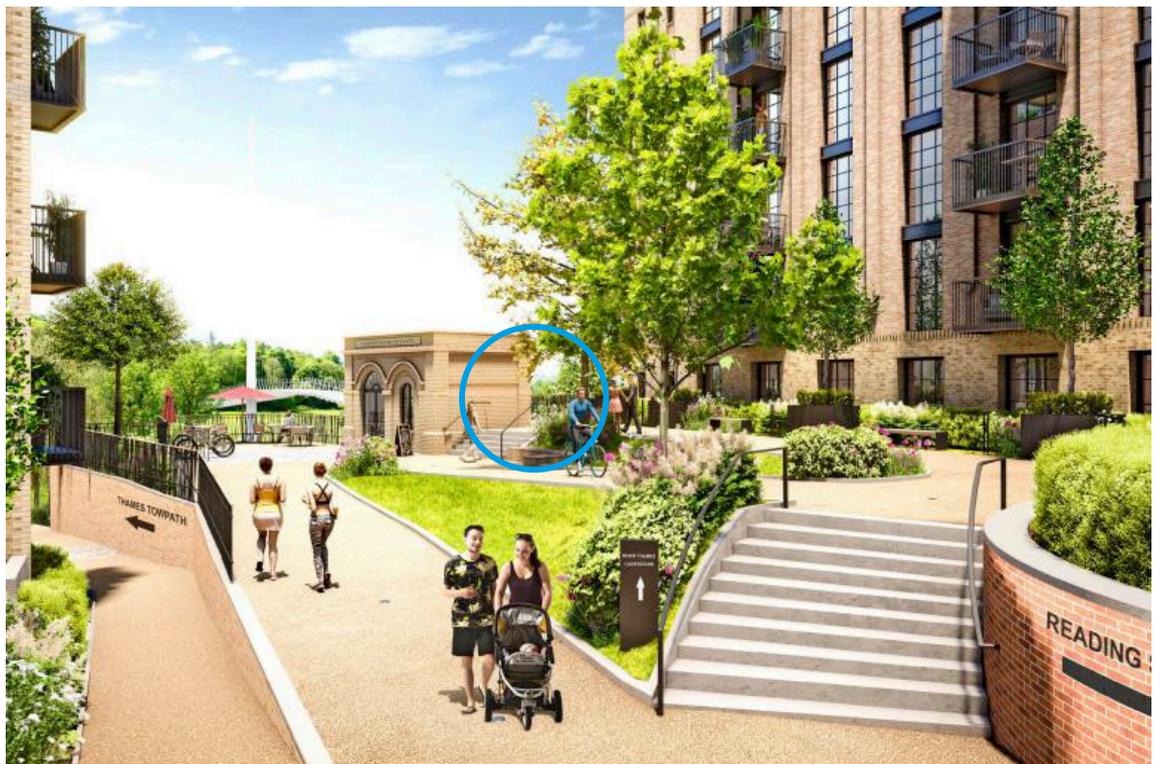


Figure 29 The Appeal Scheme includes a 'blind bend' where the staircase beside the café meets cyclists travelling down from the bridge into the scheme.

- The alternative stepped route shown in the Appeal Proposals is offered as a partial remedy for the limitations of the switchback ramp arrangement. The need for alternative stepped access routes diminishes where the ramp is better aligned with the desire line. My sketch in Appendix RA shows a potential 4m wide serpentine ramp arrangement that pedestrians and cyclists can more comfortably share.
- I have proposed alternative ramp designs down to the river/towpath.
- I have provided sketches resolving Mr. Witchalls' concerns with vehicle manoeuvring (Appendix B).

### 9.3 Mr Doyle's Alternative n-s Link Design

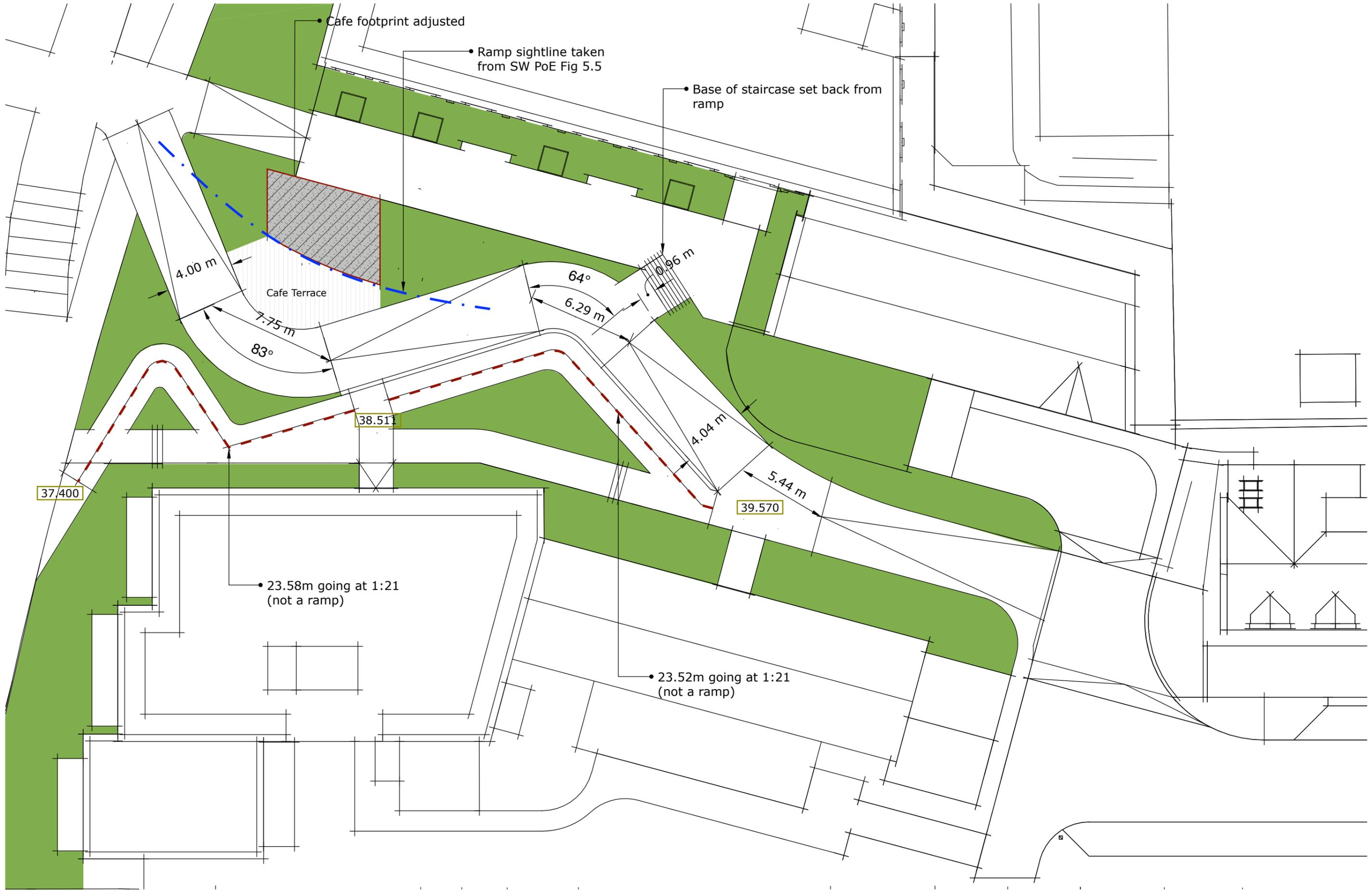
5.6.4 Mr Witchalls' para. 9.3.1 summarises his criticisms of the alterative sketches I have produced. I note again that Mr Witchalls mischaracterise the sketches as 'alternative scheme options. In summary, my responses are as follows.

- Bullet 1 - Mr. Witchalls' '*shortest and fastest route*' can only be used by non-disabled pedestrians. The serpentine ramp arrangement includes changes in direction and level landings that will slow cyclists. Mr. Witchalls has not explained why an in line ramp is appropriate and safe at the bridge's northern side.
- Bullet 2 - The visibility around the café is easily resolved by slightly amending the café footprint. Mr. Witchalls' ramp design includes a blind spot where stairs to the rear of the café meet the in-line ramp coming of Christchurch Bridge.
- Bullet 3 - Mr. Withcalls' ramp requires more railings than shown. My Appendix RA shows that a wider and more direct ramp can be created between the Appellant's building footprints.
- Bullet 4 - Appendix RA shows setbacks at the base of steps where they meet the ramp.
- Bullet 5 - Appendix RA demonstrates (in outline) show a 1:21 can be formed. Mr. Withcalls' ramp design (Appendix F) is constrained and awkward where the ramp coming up from the river meet the ramp coming down from the bridge.

- Bullet 6 - Appendix RB demonstrates how servicing arrangements can be accommodated.

# Appendix RA: Sketch plan showing alternative ramp layout

Overleaf



# **Appendix RB: Sketch plan showing accommodation of vehicle manoeuvring**

Overleaf