

55 Vastern Road, Reading, RG1 8QT

Statement of Common Ground  
between  
Berkeley Homes (Oxford and Chiltern) Ltd and Reading Borough Council  
Application Reference: 200188  
Appeal Reference: APP/E0345/W/21/3276463

**Sixth Addendum**

**Appellant Reference: 28876/A5/P15b**  
**LPA Reference: 200188**

November 2021

## **1.0 Introduction**

- 1.1 This Sixth Addendum to the Statement of Common Ground (SiASoCG) has been prepared by Barton Willmore LLP on behalf of Berkeley Homes (Oxford & Chiltern) Ltd (hereafter referred to as 'the Appellant') and was submitted to the Local Planning Authority Reading Borough Council ('RBC') on 18<sup>th</sup> November 2021. The SiASoCG (signed by both the Appellant and RBC) is submitted to the Planning Inspectorate on 19th November 2021. It is to be read in parallel with the SoCG signed on 17<sup>th</sup> September 2021 and the various signed Addendums to the SoCG.
  - 1.2 The Appellant and RBC have continued to engage following the agreement of the main SoCG including in response to requests from the Inspector.
  - 1.3 This document relates to the request to seek agreement in relation to two points which have been raised during the Inquiry in relation to development at 55 Vastern Road, Reading.
  - 1.4 In respect of RfR 1, Mr Doyle presented an alternative scheme in relation to the route to and from Christchurch Bridge within his Rebuttal Appendix RA. During Mr Doyle's cross examination, the difference in the areas of the café terrace and soft landscaping between the Appeal Scheme and Mr Doyle's Appendix RA scheme was disputed.
  - 1.5 In respect of RfR 6, Mr Doyle presented a proposal for riverside development within the neighbouring SSE site. This is contained within Figure 20 of his Rebuttal. In chief, Mr Taylor stated that this proposal would result in a loss of 36 dwellings within the appeal scheme. Mr Lintott advised the inquiry that Mr Doyle disputed this figure.
  - 1.6 The Inspector asked the Appellant and Council to seek agreement on the figures disputed in the above points. This is covered in the following statement.
  - 1.7 This SiASoCG does not repeat the content of the previously agreed SoCG and Addendums and instead only provides amended and additional text. It should be read in parallel with the previously agreed documents.
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## **2.0 RfR 1 – Differences in Landscape Areas Between the Appeal Scheme and Mr Doyle’s Rebuttal Appendix RA**

### *Background*

- 2.1. The Inspector asked that agreement be sought in respect of the calculation of areas with the Appellant’s ‘switchback’ ramp and Mr Doyle’s ‘serpentine’ arrangement.
- 2.2. Mr Taylor’s understanding was that the comparison was to be between the Appeal scheme and Mr Doyle’s Appendix RA.

### *Assessment*

- 2.3. Mr Taylor provides an assessment of the areas within the Appeal scheme (see Appendix Figure Ap.1)<sup>1</sup> which can be summarised as follows:
  1. Extent of hard landscape not in relation to any routes (i.e. access to the bridge, towpath, and dwellings is not included) – 63.8m<sup>2</sup>
  2. Extent of soft landscape – 291.2m<sup>2</sup>
- 2.4. Mr Taylor also provides an assessment of the same areas within Mr Doyle’s Appendix RA ‘proving drawing’ (see Appendix Figure Ap.2)<sup>2</sup>, as follows:
  1. Extent of hard landscape not in relation to any routes (i.e. access to the bridge, towpath, and dwellings is not included) – 29.6m<sup>2</sup> (a reduction of 34.2m<sup>2</sup> from the appeal scheme)
  2. Extent of soft landscape – 269.0m<sup>2</sup> (a reduction of 22.2m<sup>2</sup> from the appeal scheme)
- 2.5. Mr Doyle has conducted his own assessment of the same areas within the Appeal scheme (see Appendix Figure Ap.3)<sup>3</sup>, which can be summarised as follows:
  1. Extent of hard landscape not in relation to any routes (i.e. access to the bridge, towpath, and dwellings is not included) – 72.9m<sup>2</sup>
  2. Extent of soft landscape – 315.7m<sup>2</sup>
- 2.6. Mr Taylor is prepared to accept Mr Doyle’s figures.
- 2.7. Mr Doyle also presents two schemes which assess a serpentine (or ‘zig zag’) route labelled as ‘Serpentine Ramp (3m)’ and ‘Serpentine Ramp (4m)’ (see Appendix Figure Ap.3).
- 2.8. Mr Doyle considers any calculation of areas should be on a broadly comparable basis. The Appellant’s switchback arrangement is generally 3m wide when the serpentine shown at Appendix Figure Ap.2 is 4m wide. The switchback arrangement requires travelling over the podium adjacent to Block D when the serpentine does not. The arrangement of the ramp down to the riverside should also be the same for comparison purposes. Mr Doyle has therefore

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<sup>1</sup> Assessment of Landscape – Appeal Scheme, November 2021, Mr Taylor

<sup>2</sup> Assessment of Landscape – Mr Doyle’s Appendix RA Scheme, November 2021, Mr Taylor

<sup>3</sup> Drawing SK-44A, November 2021, Mr Doyle

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prepared diagrams to assist the Inspector. Mr Taylor states that the further new layouts are new evidence which has not been reviewed by him or the rest of the Appellant team.

2.9. Mr Doyle's assessment of the 'Serpentine Ramp (4m)' (see Appendix Figure Ap.3)<sup>4</sup>, can be summarised as follows:

1. Extent of hard landscape not in relation to any routes (i.e. access to the bridge, towpath, and dwellings is not included) – 29.9m<sup>2</sup>
2. Extent of soft landscape – 324.6m<sup>2</sup>

2.10. Mr Taylor agrees with Mr Doyle's assessment of both of Mr Doyle's schemes in relation to the size of the café terrace. Mr Doyle measures this to be 29.9m<sup>2</sup> (his reference H1), which is only 0.3m<sup>2</sup> different from Mr Taylor's calculations and should therefore be agreed.

2.11. Mr Doyle shows the ramp and terrace to the Turbine Hall (Block D) as additional amenity by referencing this as H2. In Mr Taylor's opinion it should not be considered in the same terms as the café terrace area.

2.12. By indicating a near identical arrangement for the ramp down to the riverside this produces a greater extent of soft landscaping in Mr Doyle's SK44A scheme (324.6m<sup>2</sup>) than in Mr Taylor's assessment of the Appendix RA scheme (269.0m<sup>2</sup>).

#### *Conclusion*

2.13. Mr Taylor and Mr Doyle do not agree on whether the assessment of soft landscaping should be measured from Mr Doyle's Rebuttal Appendix RA scheme or Mr Doyle's amended 'Serpentine (4m)' scheme.

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<sup>4</sup> Drawing SK-44A, November 2021, Mr Doyle

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### **3.0 RfR 6 – Loss of Dwellings in Relation to Provision of River Frontage Development to the SSE Site**

#### *Background*

- 3.1. Mr Doyle suggests Block D and the position of windows and balconies on the eastern elevation of this block may restrict development on the neighbouring SSE frontage, should this site be developed in the future.<sup>5</sup> In order to avoid the appeal site “capturing” the frontage, Mr Doyle states that windows and balconies would need to be omitted in the appeal scheme.<sup>6</sup>
- 3.2. Mr Doyle annotated an illustration to support the above point with development, highlighted in blue, shown directly adjacent to a set-back version of Block D (see Appendix Figure Ap.4).<sup>7</sup> Mr Doyle suggests the scheme shown in this illustration could provide 10-12 dwellings on the neighbouring SSE site with a gateway to the riverside at ground level.<sup>8</sup>
- 3.3. This image which Mr Doyle annotates reflects the scheme shown in the plan contained within Mr Taylor’s Proof of Evidence. This plan demonstrates a possible loss of 20 dwellings through setting back the building (see Appendix Figure Ap.5).<sup>9</sup> This assessment deals only with the loss of dwellings derived by setting the building back from the river, and does not show any potential loss of development created by the introduction of an adjacent block to the east of Block D.
- 3.4. The loss of dwellings set out in Mr Taylor’s Proof of Evidence in respect of the set-back of Block D was not disputed within Mr Doyle’s Rebuttal Proof.
- 3.5. In chief Mr Taylor suggested that an additional 16 dwellings may be lost by providing development directly alongside the eastern elevation of Block D. It was explained that providing development on the SSE site as per Mr Doyle’s suggestions (see 2.19 - 2.20) would result in a lack of fenestration and therefore an inability to provide dwellings along the eastern side of Block D. This would therefore result in a loss of 36 dwellings on the appeal site to potentially provide 10-12 dwellings on the SSE site.
- 3.6. Mr Doyle identifies the potential for 12-14 river front dwellings on the SSE site comprising a mix of 1 and 2 bed apartments and rising to six or seven storeys.
- 3.7. Mr Taylor does not dispute Mr Doyle’s assessment on the potential number of dwellings on the SSE site, save for questioning whether these could be 1- or 2-bedroom dwellings due to the width of riverside frontage Mr Doyle said would be available on the SSE site.

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<sup>5</sup> Para. 3.3.60, Rebuttal Proof – Design, October 2021, Mr Doyle

<sup>6</sup> Para. 3.3.62, Rebuttal Proof – Design, October 2021, Mr Doyle

<sup>7</sup> Fig. 20, Rebuttal Proof – Design, October 2021, Mr Doyle

<sup>8</sup> Para. 3.3.61, Rebuttal Proof – Design, October 2021, Mr Doyle

<sup>9</sup> Fig. Ap.12, Proof of Evidence: Design, 27 September 2021, Mr Taylor

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- 3.8. Mr Lintott advised the inquiry that Mr Doyle disputed the suggested loss of dwellings. As such, the Inspector has asked that agreement be sought in respect of the loss of dwellings generated by the potential provision of built form alongside the eastern boundary of Block D.

*Assessment*

- 3.9. Mr Taylor's states (see Appendix Figure Ap.5), the eastern elevation of Block D (to the top of the sheet) contains two apartments per floor. This applies to floors 1 – 7. Whilst not shown on this plan, there are no apartments at ground floor facing east, and only 1 apartment per floor on floors 8 – 9. Mr Taylor says this equates to a total of 16 east-only facing apartments, which would be lost if development on the SSE site were to take place adjacent to them.
- 3.10. Mr Doyle agrees there will be some loss of dwellings but disputes Mr Taylor's assessment for the following reasons.
- a) Mr Taylor has not provided a layout indicating the form of a riverfront block on the SSE site.
  - b) Mr Doyle proposes a 12m deep riverfront block on the SSE site that will not affect the aspect of greater part of the eastern face of Block D.
  - c) Six residential storeys on the SSE site would only rise up to the level of the fifth floor of Block D. From sixth floor and above there will be no effect on aspect.
- 3.11. Mr Doyle has provided four new analysis diagrams (see Appendix Figure Ap.6, figures 1-4).
- a) Figures 1 and 2 examine the form of a SSE riverside block, the potential unit mix and impact on Block D.
  - b) Figures 3 and 4 explore the effect of setting Block D back from the riverside.
- 3.12. These reflect the description of a block on the SSE site at para. 3.3.61 of Mr Doyle's Rebuttal Proof but do not reflect the illustration shown within Mr Doyle's Rebuttal Figure 20 by virtue of:
- 1. Figures 1 and 2 do not show Block D being set-back to any extent.
  - 2. Figures 3 and 4 show Block D set-back, but it should be noted that it has been set back to a lesser extent than Mr Doyle's Rebuttal Figure 20 (and therefore Mr Taylor's Proof Figure Ap.12) to somewhere in the order of 3m.
  - 3. Figures 3 and 4 show the SSE development set forward from the face of a set-back Block D, not set adjacent as demonstrated within his Rebuttal Figure 20.
- 3.13. Mr Doyle says that development in accordance with figures 1 and 2 would not lead to a loss of dwellings within Block D.
- 3.14. Mr Taylor agrees with this assessment, noting that this would result in a loss of 4 x 2-bed dwellings, a loss of 1 x 3-bed dwelling, and a gain of 5 x 1-bed dwellings.
- 3.15. Mr Doyle says that development in accordance with figures 3 and 4 (Block D set back) would lead to a loss of 13 dwellings within Block D.
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- 3.16. Mr Taylor agrees with this assessment, noting that this would result in a loss of 12 x 2-bed dwellings, a loss of 8 x 3-bed dwellings, and a gain of 7 x 1-bed dwellings. Mr Taylor also notes that the suggested change in dwelling mix (in particular the loss of 3-bed dwellings) would result in these options not being compliant with the mix guide within Policy CR6. There would be 4 x 3-bed dwellings within a reduced 196 dwellings on site and therefore a provision of 2% rather than the minimum 5% guide). The Council confirms that Policy CR6 states *“As a guide... a minimum of 5% of units should be at least 3-bed, unless it can be clearly demonstrated that this would render a development unviable”*. The Council notes that the policy is clear in detailing that scheme viability can justify flexibility in these mix guides. The appeal development cannot viably provide any affordable housing at this time, as already agreed within the original SoCG signed on 17/09/2021 (paragraph 7.43). Accordingly, whilst the proposal would no longer comply with the guide, the viability of the scheme would allow flexibility in this regard.
- 3.17. Mr Taylor remains of the view that if Block D were set back as per Mr Doyle’s Rebuttal Figure 20, there would be a loss of 20 dwellings.
- 3.18. Mr Doyle notes Mr Taylor’s assessment is not based on any study of the form of block on the SSE site.
- 3.19. Mr Doyle and Mr Taylor agree that reducing the extent to which Block D is shown to be set back would result in fewer dwellings being lost.
- 3.20. Mr Taylor therefore remains of the view that should development be provided on the SSE site adjacent to a set-back Block D, due to a lack of windows and balconies on the eastern elevation of Block D there would be a loss of a further 16 dwellings (a loss of 36 in total when including the loss due to setting back the building).
- 3.21. Any calculated loss of units from Block D should be set against the future gain in units within the SSE riverfront block. Mr Taylor and Mr Doyle Agree this will amount to at least 12 units.

### *Conclusion*

- 3.22. It is agreed that a riverside building on the SSE site could provide at least 12 dwellings.
- 3.23. In relation to Mr Doyle’s other options, it is agreed that in relation to figures 1 and 2 there would be no loss of dwellings and in relation to figures 3 and 4 there would be a loss of 13 dwellings.
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## 4. DECLARATIONS

4.1 The above matters have been agreed by RBC and the Appellant.

Signed and dated on behalf of Reading Borough Council

*Jonathan Markwell*

Date 19/11/2021, at 0810hrs

Jonathan Markwell, Principal Planning Officer, Reading Borough Council

Signed and dated on behalf of the Appellant

*Kim Cohen*

Date 19/11/2021, at 820hrs

Kim Cohen, Partner, Barton Willmore

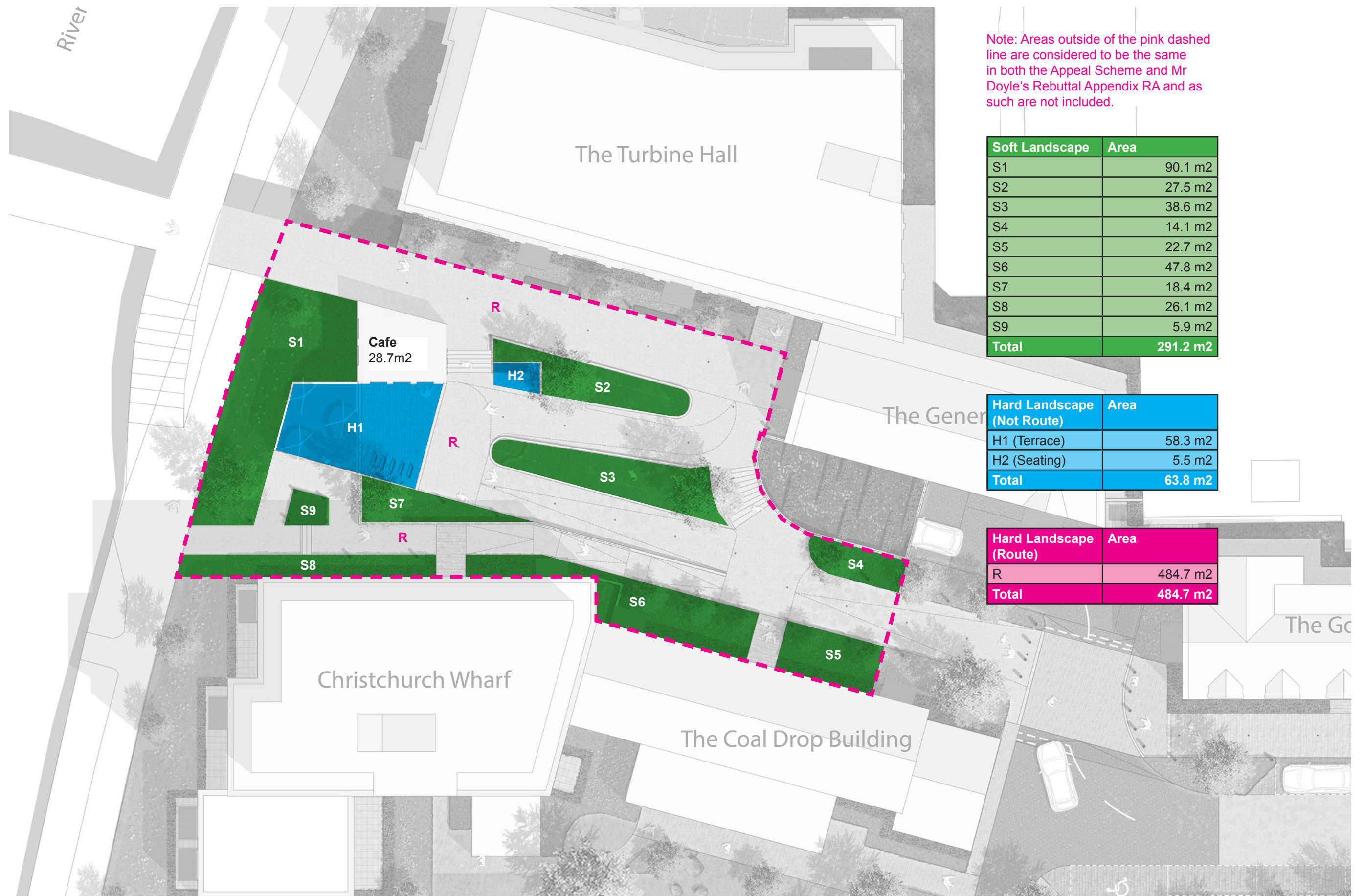
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## Appendix

*Fig. Ap.1. Areas of Landscape – Appeal Scheme Assessment*



Note: Areas outside of the pink dashed line are considered to be the same in both the Appeal Scheme and Mr Doyle's Rebuttal Appendix RA and as such are not included.

Soft Landscape	Area
S1	90.1 m2
S2	27.5 m2
S3	38.6 m2
S4	14.1 m2
S5	22.7 m2
S6	47.8 m2
S7	18.4 m2
S8	26.1 m2
S9	5.9 m2
Total	291.2 m2

Hard Landscape (Not Route)	Area
H1 (Terrace)	58.3 m2
H2 (Seating)	5.5 m2
Total	63.8 m2

Hard Landscape (Route)	Area
R	484.7 m2
Total	484.7 m2

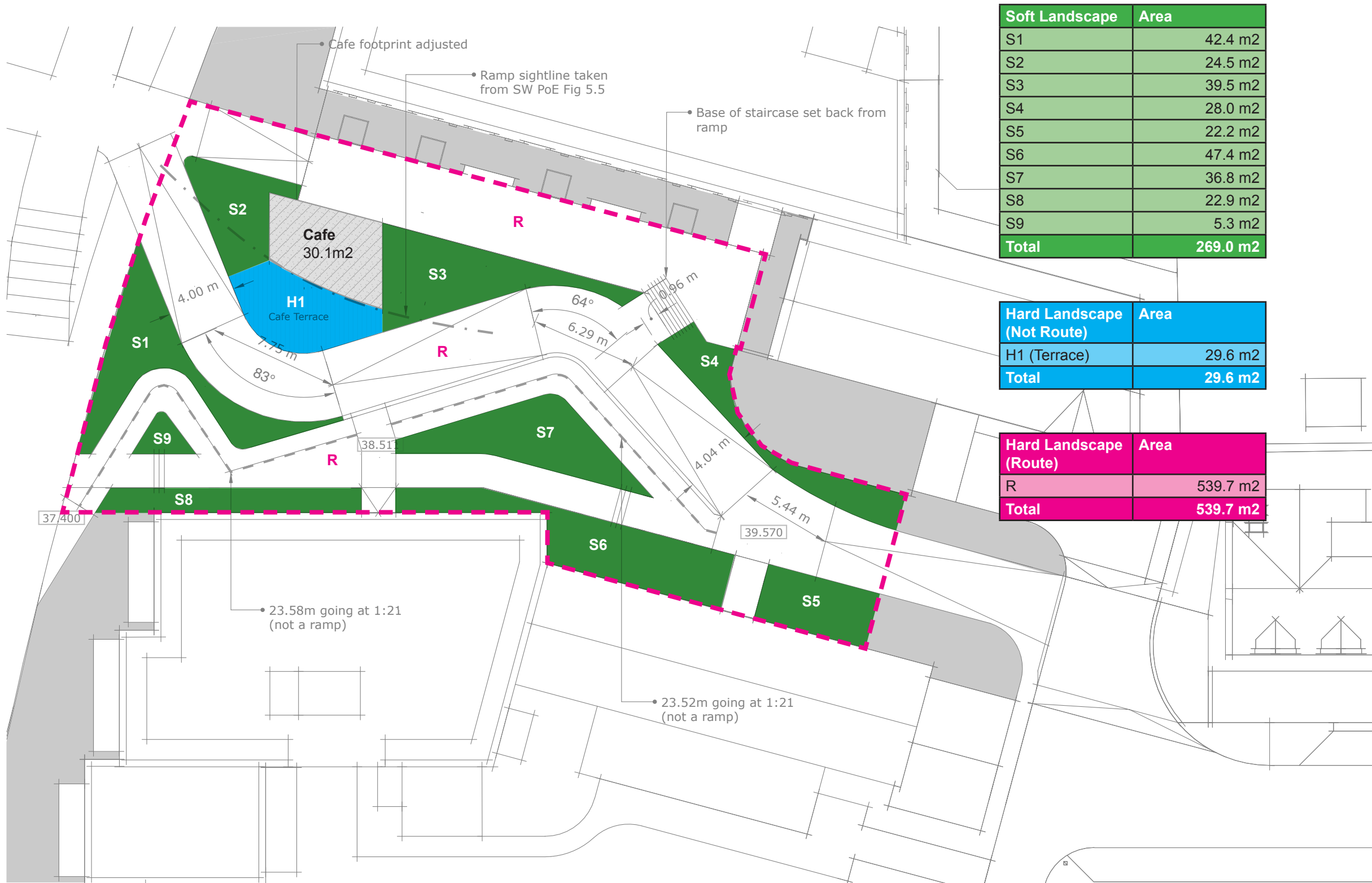
Areas of Landscape  
Appeal Scheme  
Scale 1:250 @ A3

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*Fig. Ap.2. Areas of Landscape – Mr Doyle’s Appendix RA Scheme Assessment*

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Note: Areas outside of the pink dashed line are considered to be the same in both the Appeal Scheme and Mr Doyle's Rebuttal Appendix RA and as such are not included.



Soft Landscape	Area
S1	42.4 m2
S2	24.5 m2
S3	39.5 m2
S4	28.0 m2
S5	22.2 m2
S6	47.4 m2
S7	36.8 m2
S8	22.9 m2
S9	5.3 m2
Total	269.0 m2

Hard Landscape (Not Route)	Area
H1 (Terrace)	29.6 m2
Total	29.6 m2

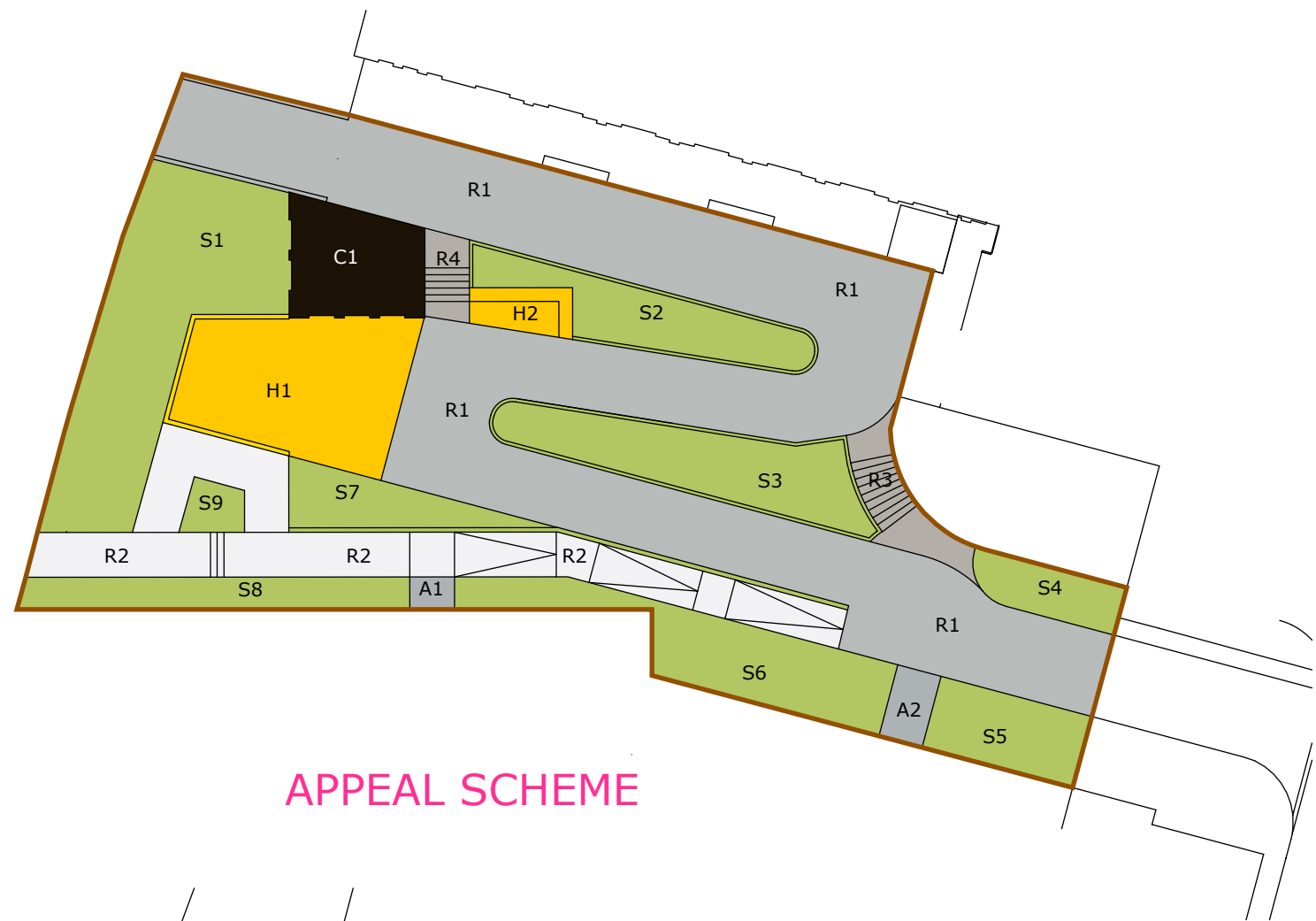
Hard Landscape (Route)	Area
R	539.7 m2
Total	539.7 m2

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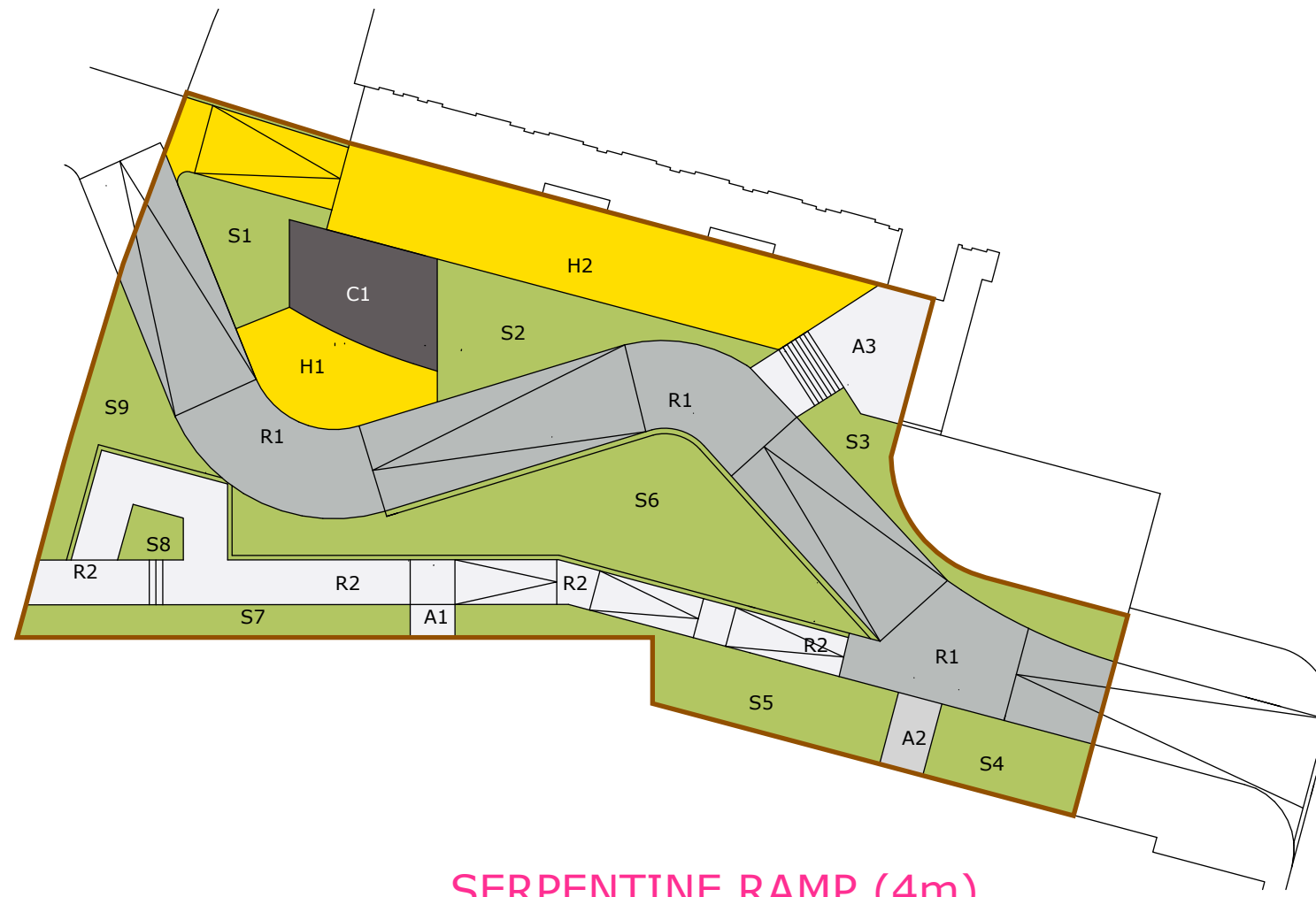
*Fig. Ap.3. Mr Doyle's Assessment of Landscape Areas, 17 November 2021*

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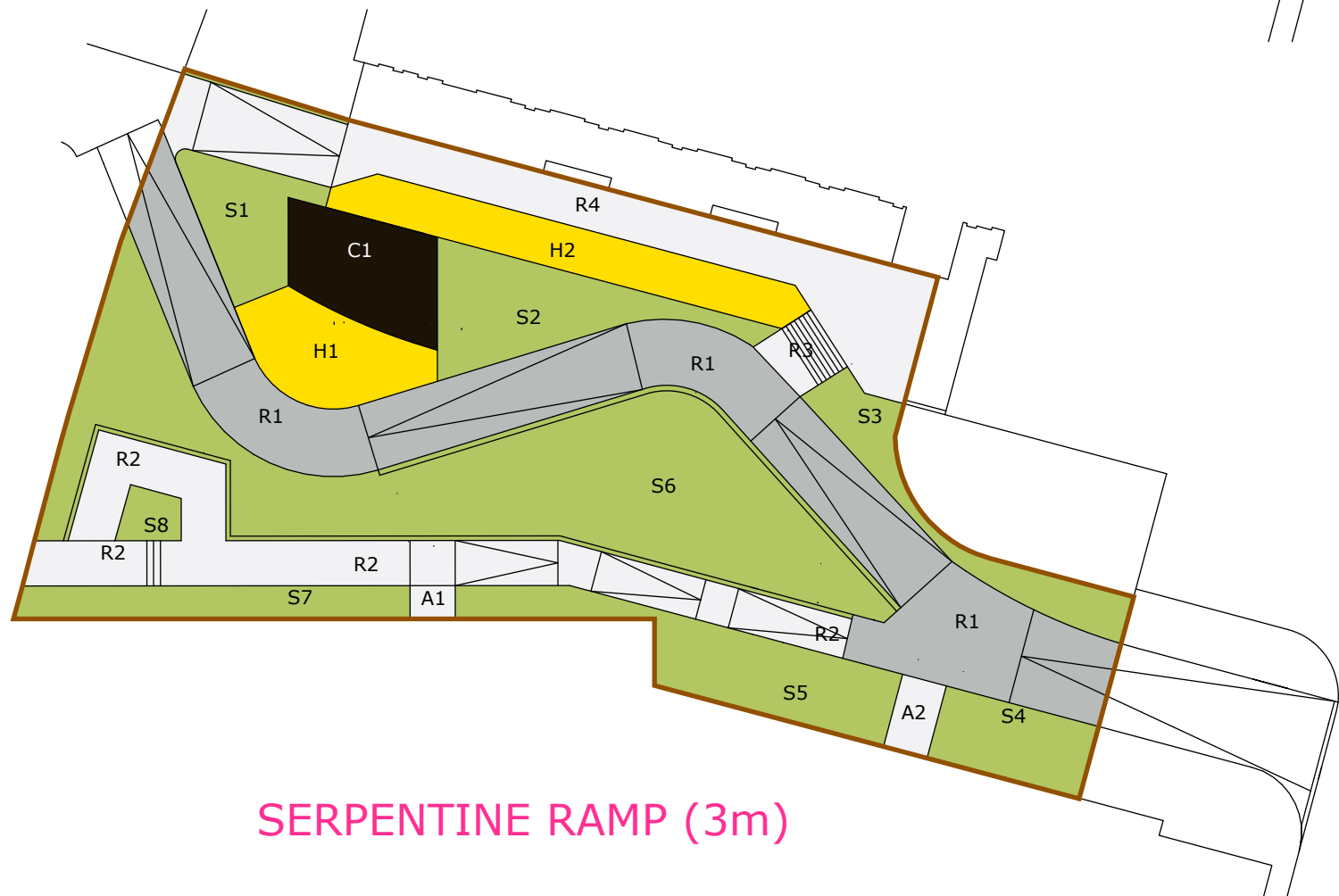




APPEAL SCHEME



SERPENTINE RAMP (4m)



SERPENTINE RAMP (3m)

Appeal Scheme					
R1	333.66	S1	88.95	C1	28.80
R2	92.54	S2	35.75		
R3	15.44	S3	49.97	H1	63.79
R4	7.69	S4	14.63	H2	9.08
		S5	23.10		
		S6	47.39	A1	2.94
		S7	24.57	A2	6.63
		S8	25.55		
		S9	5.80		
SUB TOTAL	449.33	SUB TOTAL	315.71	SUB TOTAL	111.24
				TOTAL	876.28
Serpentine Ramp (3m)					
R1	186.83	S1	24.62	C1	30.86
R2	92.49	S2	39.98		
R3	8.29	S3	27.91	H1	29.88
R4	95.67	S4	23.19	H2	42.43
		S5	47.39		
		S6	187.68	A1	2.94
		S7	25.55	A2	6.63
		S8	5.80	A3	
SUB TOTAL	383.28	SUB TOTAL	382.12	SUB TOTAL	112.74

Serpentine Ramp (4m)					
R1	232.10	S1	24.62	C1	30.86
R2	92.49	S2	39.98		
		S3	27.91	H1	29.88
		S4	23.19	H2	117.05
		S5	47.39		
		S6	110.39	A1	2.94
		S7	25.55	A2	6.63
		S8	5.80	A3	29.34
		S9	32.01		
SUB TOTAL	324.59	SUB TOTAL	336.84	SUB TOTAL	216.70
				TOTAL	878.13

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*Fig. Ap.4. Mr Doyle's Rebuttal Figure 20*

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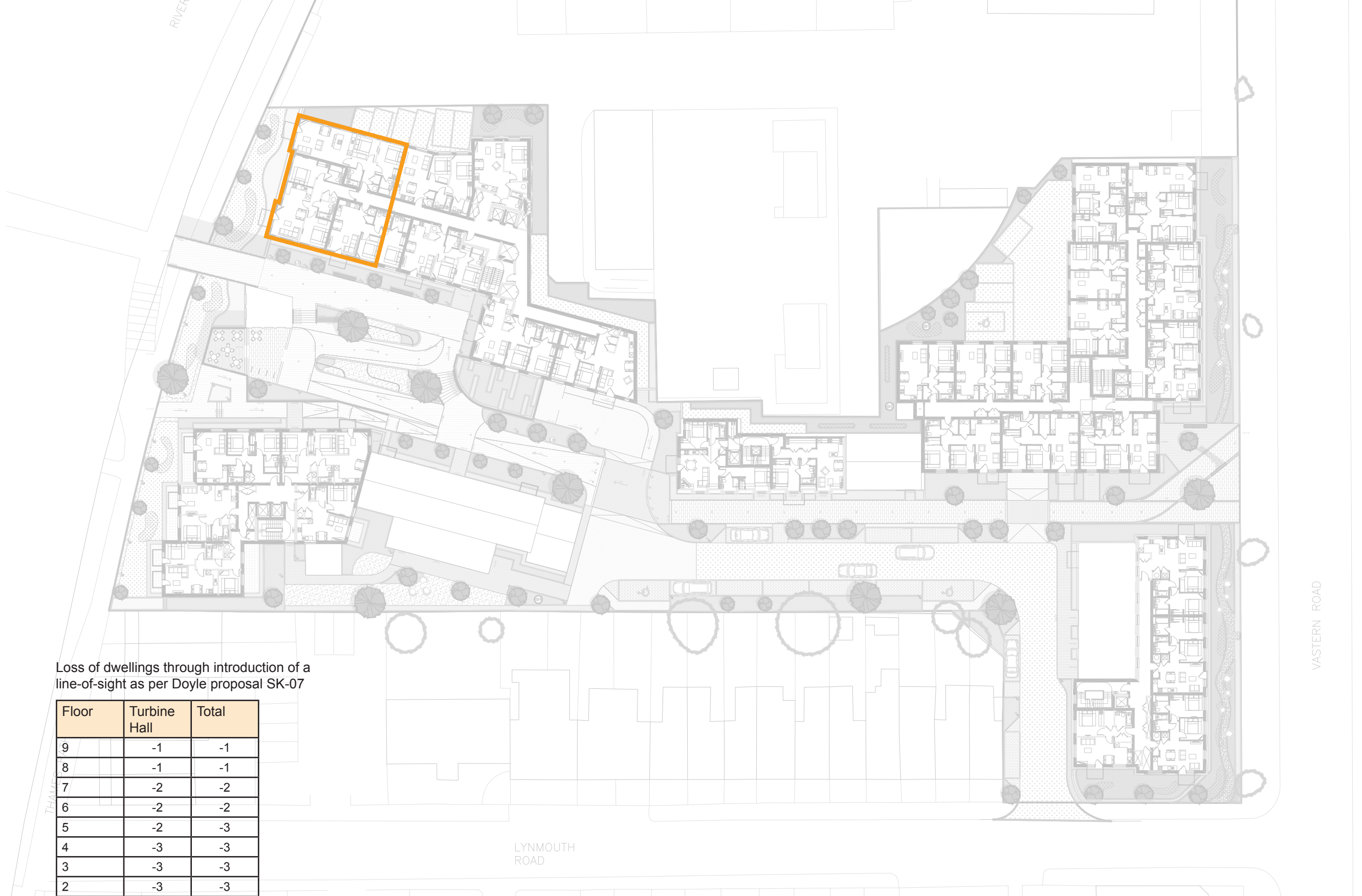
Figure 20 Potential riverfront and river-facing development on the SSE site (blue line)



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*Fig. Ap.5.      Mr Taylor's Proof of Evidence Figure Ap.12*

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Loss of dwellings through introduction of a line-of-sight as per Doyle proposal SK-07

Floor	Turbine Hall	Total
9	-1	-1
8	-1	-1
7	-2	-2
6	-2	-2
5	-2	-3
4	-3	-3
3	-3	-3
2	-3	-3
1	-3	-3
0	0	0
Total	-20	-20

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*Fig. Ap.6. Mr Doyle's Alternative SSE Riverside Schemes, 18 November 2021*

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FIGURE 1 :2 X 1 BED UNITS PER FLOOR = 12 2-BED UNITS

The Turbine Hall with 12 m deep block on SSE site adjacent				
	1 Bed Dwellings	2 Bed Dwellings	3 Bed Dwellings	Total Dwellings
Ground	0	0	0	0
First	3	3	0	6
Second	2	4	0	6
Third	2	4	0	6
Fourth	2	4	0	6
Fifth	2	2	1	5
Sixth	1	2	2	5
Seventh	1	2	2	5
Eighth	0	0	3	3
Ninth	0	0	3	3
	13 (plus 5)	21 (minus 4)	11 (minus 1)	45 (no change)

New six storey block on SSE river frontage (Approx. 10-13m deep)				
	1 Bed Dwellings	2 Bed Dwellings	3 Bed Dwellings	Total Dwellings
Ground**	2	0	0	2
First	2	0	0	2
Second	2	0	0	2
Third	2	0	0	2
Fourth	2	0	0	2
Fifth	2	0	0	2
	12	0	0	12

\*\* Assumes ground floor is raised above flood level as for Block E.

FIGURE 2: 1 X 1-BED AND 1 X 2-BED UNITS PER FLOOR

The Turbine Hall with 12 m deep block on SSE site adjacent				
	1 Bed Dwellings	2 Bed Dwellings	3 Bed Dwellings	Total Dwellings
Ground	0	0	0	0
First	3	3	0	6
Second	2	4	0	6
Third	2	4	0	6
Fourth	2	4	0	6
Fifth	2	2	1	5
Sixth	1	2	2	5
Seventh	1	2	2	5
Eighth	0	0	3	3
Ninth	0	0	3	3
	13 (plus 5)	21 (minus 4)	11 (minus 1)	45 (no change)

New six storey block on SSE river frontage (Approx. 10-13 m deep)				
	1 Bed Dwellings	2 Bed Dwellings	3 Bed Dwellings	Total Dwellings
Ground**	1	1	0	2
First	1	1	0	2
Second	1	1	0	2
Third	1	1	0	2
Fourth	1	1	0	2
Fifth	1	1	0	2
	6	6	0	12

\*\* Assumes ground floor is raised above flood level as for Block E.

FIGURE 1: 2 x 1 BED UNITS PER FLOOR



FIGURE 2: 1 x 1 BED AND 1 x 2 BED UNITS PER FLOOR



FIGURE 3: BLOCK D SETBACK (SSE LAYOUT 1)

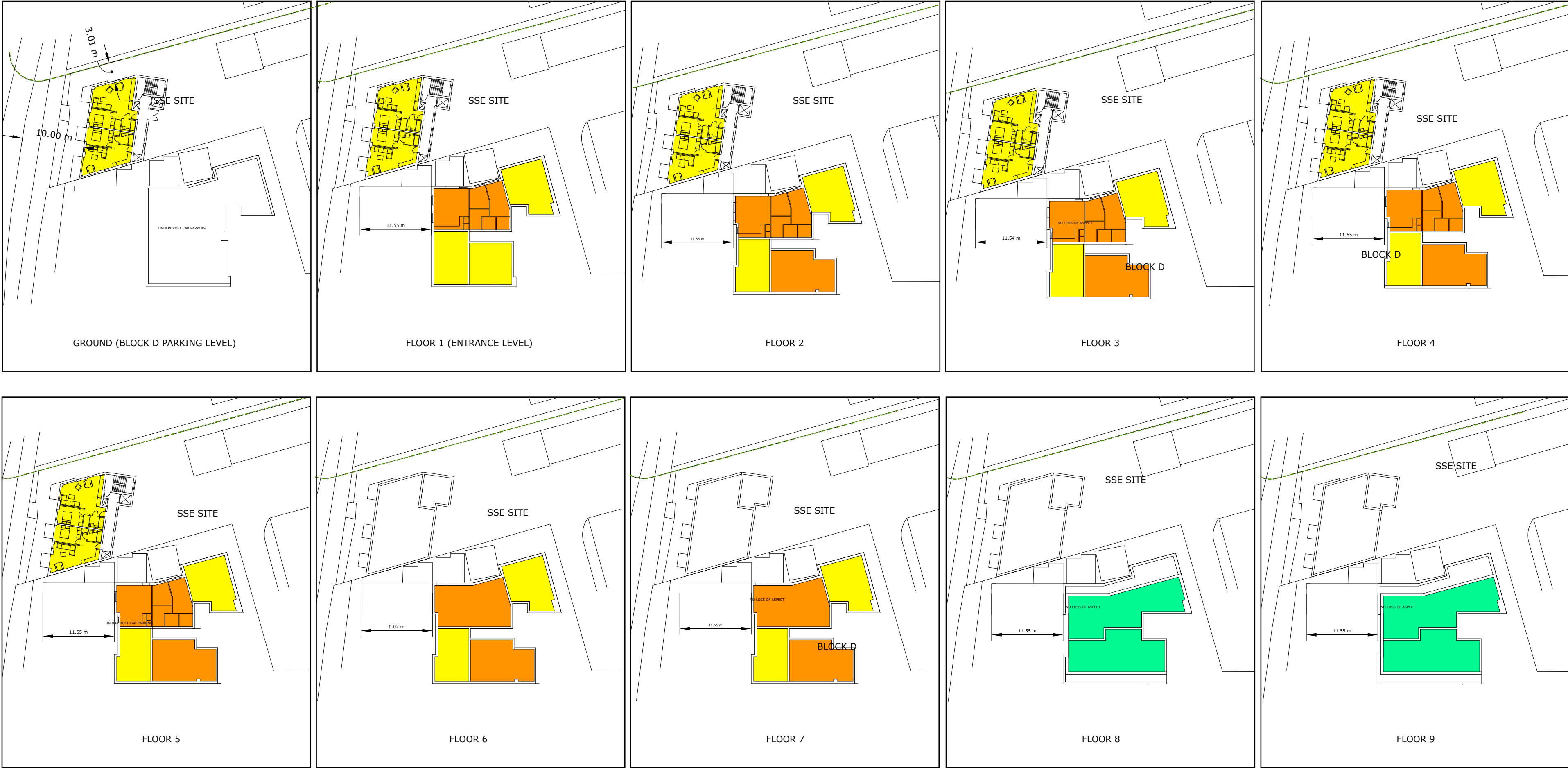
The Turbine Hall depth reduced				
	1 Bed Dwellings	2 Bed Dwellings	3 Bed Dwellings	Total Dwellings
Ground	0	0	0	0
First	3	1	0	4
Second	2	2	0	4
Third	2	2	0	4
Fourth	2	2	0	4
Fifth	2	2	0	4
Sixth	2	2	0	4
Seventh	2	2	0	4
Eighth	0	0	2	2
Ninth	0	0	2	2
	15 (plus 7)	13 (minus 12)	4 (minus 8)	32 (minus 13)

New six storey block on SSE river frontage (Approx. 10-12m deep)				
	1 Bed Dwellings	2 Bed Dwellings	3 Bed Dwellings	Total Dwellings
Ground**	2	0	0	2
First	2	0	0	2
Second	2	0	0	2
Third	2	0	0	2
Fourth	2	0	0	2
Fifth	2	0	0	2
	12	0	0	12

\*\* Assumes ground floor is raised above flood level as for Block E.



FIGURE 3: BLOCK D (TURBINE HALL) SETBACK (SSE Layout 1)



PROPERTY  
55 VASTERN ROAD

DRAWING TITLE  
HOUSING CAPACITY SSE SITE RIVERFRONT  
(LAYOUT 1)

DRAWING REFERENCE  
SK-41 REV A

1 BED UNIT  
2 BED UNIT  
3 BED UNIT

SCALE  
NTS

DOYLE  
TOWN PLANNING + URBAN DESIGN  
Doyle Design LLP  
86-90 Paul Street  
London  
EC2A 4NE

FIGURE 4: BLOCK D SETBACK (SSE LAYOUT 2)

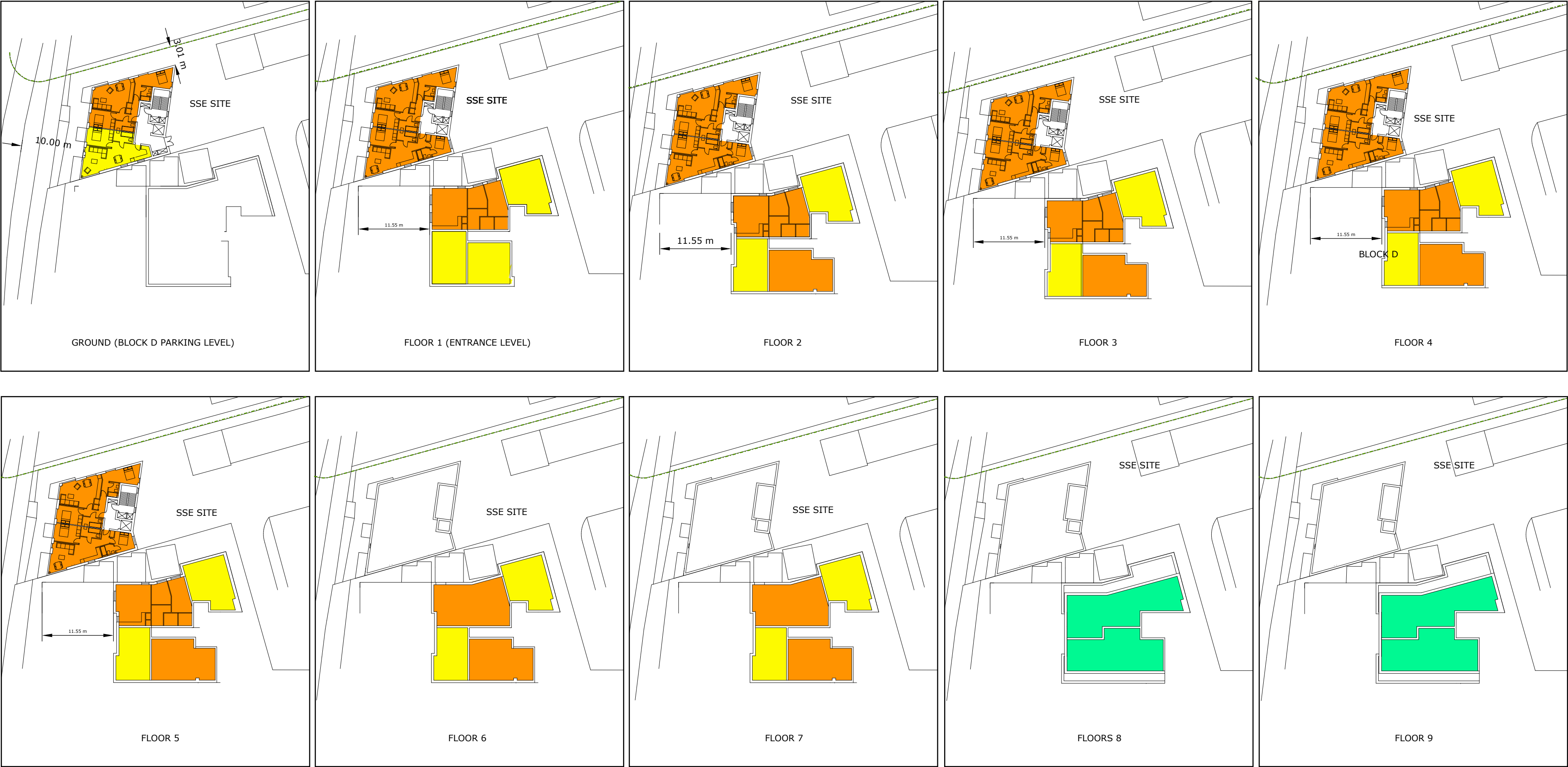
The Turbine Hall depth reduced				
	1 Bed Dwellings	2 Bed Dwellings	3 Bed Dwellings	Total Dwellings
Ground	0	0	0	0
First	3	1	0	4
Second	2	2	0	4
Third	2	2	0	4
Fourth	2	2	0	4
Fifth	2	2	0	4
Sixth	2	2	0	4
Seventh	2	2	0	4
Eighth	0	0	2	2
Ninth	0	0	2	2
	15 (plus 7)	13 (minus 12)	4 (minus 8)	32 (minus 13)

New six storey block on SSE river frontage (Approx. 13m deep)				
	1 Bed Dwellings	2 Bed Dwellings	3 Bed Dwellings	Total Dwellings
Ground**	1	1	0	2
First	0	2	0	2
Second	0	2	0	2
Third	0	2	0	2
Fourth	0	2	0	2
Fifth	0	2	0	2
	1	11	0	12

\*\* Assumes ground floor is raised above flood level as for Block



FIGURE 4: BLOCK D (TURBINE HALL) SETBACK (SSE Layout 2)



**PROPERTY**  
55 VASTERN ROAD

**DRAWING TITLE**  
HOUSING CAPACITY SSE SITE RIVERFRONT  
(LAYOUT 2)

**DRAWING REFERENCE**  
SK-42 REV A

1 BED UNIT  
2 BED UNIT  
3 BED UNIT

**SCALE**  
NTS

**DOYLE** Doyle Design LLP  
86-90 Paul Street  
London  
EC2A 4NE  
TOWN PLANNING + URBAN DESIGN