

Vastern Court, Reading

Statement of Case

Design and Townscape Appendix J

Appeal to the Secretary of State against the decision of Reading Borough Council under section 78 of the Town and Country Planning Act 1990.

LPA Application Reference: 200328/OUT

for
**Reading Borough
Council**

February 2021

DOYLE

86-90 Paul Street
London
EC2A 4NE
T. 020 3305 7476
Number 3,
159 Marine Parade
Brighton
BN2 1EJ
T. 01273 567 777
michaeldoyle.doyle@gmail.com
DOYLE DESIGN LLP
Partnership No. OC3088999

List of Partners available at the above
address.

Contents

1	Introduction	5
1.1	Personal details	5
1.2	LPA decision	5
1.3	Scope	5
1.4	Appeal scheme	6
1.5	General conclusions on the Appeal Scheme	7
2	Scale, height, and massing	9
2.1	Reasons for refusal relating scale, height, and massing	9
2.2	NPPF	9
2.3	National Design Guidance	10
2.4	Local Plan	11
2.5	RSAF	14
2.6	Benchmark heights and Landmark buildings	14
2.7	Reading Tall Buildings Strategy	15
2.8	Overall massing	16
2.9	Adjacent residential and historic core areas	17
2.10	Legibility	17
2.11	Development plots	18
2.12	Amended scale and heights	18
2.13	Historic England	19
2.14	Tall buildings and public spaces	19
2.15	Relationship to SSE (CR11g)	19
2.16	The established scale of development in Reading Town Centre	20
2.17	Tall buildings in Reading Town Centre	20
2.18	Height Parameter Plans	20
2.19	Design code	20
2.20	Summary and conclusions	21
3	Setting/Views	24
3.1	RR 3. Views and townscape	24
3.2	RR 5. Heritage	24
3.3	NPPF	24
3.4	National Design Guidance	25
3.5	Local Plan	25
3.6	Reading Station Area Framework	29
3.7	Reading Tall Buildings Strategy	29
3.8	Historic England comments	31

3.9	Historic England Practice Guidance (Advice Note 4, 2015, and current consultation draft)	32
3.10	Plots C & D - Position, footprint, and height	33
3.11	Short and medium-distance views	33
3.12	LVIA	34
3.13	Design code	35
3.14	Reserve matters	36
3.15	Summary and conclusions	37
4	Layout, routes, and integration	40
4.1	Reasons for refusal	40
4.2	NPPF	40
4.3	National Design Guidance	40
4.4	Local Plan	41
4.5	Reading Station Area Framework	43
4.6	Strategic nature of the North-South Link	43
4.7	Alignment and form	45
4.8	Legibility	46
4.9	55 Vastern Road	46
4.10	Reading Grid and Permeability	47
4.11	Direct line of sight and wayfinding	47
4.12	Level of detail needed	48
4.13	Parameter Plans and Design Code	48
4.14	Plots C and D	49
4.15	Summary and conclusions	49
5	Public Realm and the interface of the development with the surrounding	51
5.1	Reason for refusal	51
5.2	NPPF	51
5.3	National Design Guidance	52
5.4	Local Plan	52
5.5	Reading Station Area Framework	54
5.6	Development Site interfaces	55
5.7	Vastern Road interface	55
5.8	Caversham Road interface	56
5.9	East-West link, western public space, and interface with RMG site	56
5.10	Station Square North Interface	57
5.11	Summary and conclusions	57

Figures

Figure 1 Diagram extracted from the Appellant’s DAS showing the RSAF parcels (N1-N6) overlaid on the Appellant’s block model. The blue line is the RSAF direct alignment and the red line of the Appellant’s proposed alignment (DAS Page 63)..... 45

1 Introduction

1.1 Personal details

1.1.1 This Statement of Case Appendices has been written by Mr Michael Doyle BA (Hons.), Dip. UD Dip.TP, MRTPI. Mr Doyle holds a Bachelor of Arts degree with honours in Urban and Regional Planning from Coventry University, a Post Graduate Diploma in Urban Design from Oxford Brookes University, and a Post Graduate Diploma in Urban Planning from Westminster University.

1.1.2 He has 37 years of experience as a town planner, urban designer, and heritage consultant. He is a Chartered Member of the Royal Town Planning Institute, an Affiliate Member of the Institute Historic Building Conservation, and the Urban Design Group.

1.1.3 Mr Doyle was the principal author of the Reading Station Area Framework for Reading Borough Council (RBC). He worked as part of the RBC team to develop Reading Rail Station and the public realm framework for the Station setting and public transport interchanges. He worked as part of the team that determined the position, alignment, and form of the Christchurch Bridge.

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

1.1.5 The opinions expressed in this statement are his.

1.2 LPA decision

1.2.1 The Planning Applications Committee of 15 February 2022 confirmed that, had they been able to determine the planning application, they would have resolved to refuse outline planning permission for the reasons set out in the report.

1.3 Scope

LPA Statements of Case

1.3.1 The LPA main Statement of Case (SOC) sets out the case it intends to put forward at the Inquiry and the documents it will refer to in evidence.

1.3.2 The Main Statement of Case is supported by separate Statements of Case from Expert Witnesses appended to the Main SOC.

1.3.3 Reference will be made as necessary to the LPA main Statement of Case (LPA SOC) and appended statements.

Appendix A

1.3.4 This Statement sets out the LPA's view on the proposal's urban design, townscape, and placemaking issues focusing on the layout, scale, form, and height of the proposals, the response to the site's existing character and context, the quality of the design proposals, and how they interface with the existing area. It examines whether the scale, massing and siting of the proposed development are appropriate to its context and whether the extent of its impact is appropriate in design terms.

1.4 Appeal scheme

1.4.1 The proposals comprise the detail in the Appellant's "Amended Planning Application Booklet" (dated October 2021), which contains the completed application forms, certificates, description of the development and "Development Parameter Schedule and Plans. The Appellant variously refers to the Development Parameter Schedule and Plans' or Parameter Plans.

1.4.2 The Appellant suggests the Parameter Plans will control the development by the imposition of a condition to ensure that reserved matters submissions will comply with the Development Parameters (SOC para. 2.3).

1.4.3 Evidence will refer to the Environmental Impact Assessment (EIA), particularly Volume 2A -Townscape, Visual and Built Heritage.

1.4.4 Evidence will refer to the submitted Design and Access Statement (DAS) of September 2021, with particular focus on Chapter 5 (Development Parameters) and Chapter 6 (Illustrative Scheme or Concept). The Appellant states the illustrative masterplan shows how a detailed scheme could come forward in accordance with the proposed Development Parameters. (SOC para. 2.6)

1.4.5 Evidence will also refer to the Appellant's Design Code (September 2021).

1.5 General conclusions on the Appeal Scheme

1.5.1 Contrary to the Appellant's claim (SOC para. 5.16), evidence will demonstrate that the application will not result in a high-quality scheme delivered at the Site.

Policy

1.5.2 The Development Parameters' scope, contents, and detail are insufficiently detailed or prescriptive to ensure compliance at the reserved matters stage. This will limit the LPA's scope to require a high-quality scheme (SOC para. 5.16).

1.5.3 The Design and Access Statement and Design Code do not demonstrate how policy compliance can be achieved (SOC para. 5.16) concerning several main matters -height and massing, views, the North-South Link, public realm) interfaces (RR1-6).

1.5.4 Evidence will point to specific areas where the effects of the development on the character and setting of the wider townscape as well as the immediate Appeal Site will be harmed and will not, therefore, contribute positively to the character of Reading (SOC 5.26).

Design and Access Statement

1.5.5 The Appellant claims the Design and Access Statement sets out the illustrative design rationale for the proposals within the existing and future context of central Reading. (SOC Appx.2 para 4.10.1). The Appellant claims it establishes the aspiration and ambition of the scheme and includes illustrative proposals that indicate one way, but not the only way, in which development may come forward in accordance with the Development Parameters and Design Code' (SOC Appx.2 para 4.10.1).

Illustrative scheme

1.5.6 The Appellant's Scheme for illustration purposes; 'illustrates one possible solution for a scheme that has been planned and visualised to demonstrate that the Design Code can deliver an acceptable scheme design' (SOC Appx.2 para. 4.1). Evidence will point to shortcomings in the illustrative scheme that the Design Code will not effectively remedy.

Parameter Plans and Design Code

1.5.7 Evidence will point to the limited scope of the Development Parameters and a lack of specificity and firm requirements in the Design Code. This leaves an 'open door' through

which an unsatisfactory scheme may come forward that will be difficult for the LPA to resist at the Reserve Matters Stage. Far from allowing a “appropriate level of design development to take place and for variation to be established”(SOC Appx.2 para 4.10.2), the Parameters and Code, all too easily, allow unwelcome deviations and degradations.

- 1.5.8 The Design Code is insufficient to ‘guide the preparation of and assess the acceptability of future Reserved Matters applications. (SOC Appx.2 para 4.10.3). It will not ensure that the development ‘is well designed and built to a high standard’. The Design Code will fail to ‘instruct and guide the future physical development of the site’ (SOC Appx.2 para 4.10.2), whilst a ‘suitably worded planning condition’ will be insufficient to correct shortcomings in the Design Code.
- 1.5.9 The details of **Phasing** in the Parameter Plans will fail to ensure that a high-quality development takes place in a coordinated fashion” (SOC Appx.2 para 4.10.4)

Structure

- 1.5.10 The fundamental design concerns reflected in the LPA Reasons for Refusal break down into four main areas are outline e remained of this Statement of Case:
- Scale, height, and massing (RR1. Scale, height, and massing and RR2. Tall buildings)
 - Setting/Views (RR3 Views and Townscape and RRF 5 Heritage)
 - Layout, routes, and integration - the North-south link (RR4 North-south link)
 - Public Realm and the interface of the development with the surrounding area (Principally R6 Public Realm).

2 Scale, height, and massing

2.1 Reasons for refusal relating scale, height, and massing

RR1. Scale, height, and massing

The Applicant has failed to demonstrate how proposed plot heights in excess of Local Plan and RSAF height and massing guidance will not result in unacceptable detrimental effects on the townscape, the surrounding area and the setting of public spaces, especially when considered in the context of cumulative effects with adjoining allocated, emerging and existing sites contrary to NPPF Section 12., the National Design Guide, National Model Design Code Parts 1 and 2, Reading Borough Local Plan Policies (2019) Policies CR2, CR3, CC7, H2, CR10 and CR10(a), CR11 and CR11e, the Reading Station Area Framework (2010).

RR2. Tall buildings

The siting, height and likely massing of proposed Tall Buildings within Plots A, B, C and D are bulky, harmful to the setting and the character of the surrounding area and public spaces and fails to achieve the high standard of design expected of a Tall Building. This is contrary to NPPF Section 12, Reading Borough Local Plan Policies (2019) EN1, EN3, EN5, CR2, CR3, CC7, CR10, H2, CR11, The Reading Tall Buildings Strategy, The Reading Tall Buildings Strategy Update Note 2018, and the Reading Station Area Framework (2010).

2.2 NPPF

2.2.1 NPPF para. 126 states the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Development that is not well designed should be refused (para. 134). Being clear about design expectations, and how these will be tested, is essential for achieving good design (para. 126).

2.2.2 Evidence will demonstrate that the scale and height of the Appeal Scheme does not accords with NPPF.

2.3 National Design Guidance

- 2.3.1 The NPPF (para. 129) confirms the Applicant's Design Code should take account of the guidance contained in the National Design Guide and the National Model Design Code. Development that is not well designed should be refused, especially where it fails to government guidance on design (NPPF para.129).
- 2.3.2 The National Design Guide confirms well-designed places come about through making the right choices at all levels, including the three-dimensional form and scale of buildings (NDG paras. 21, 23 and 26).
- 2.3.3 Evidence will demonstrate that the scale, height, and massing of Appeal proposals do not follow the NDG ten principles of good design, including Context (C1 and C2), Identity (I1 and I2) and Built Form (B2), the NMDC Part 1 coding process guidance (including Built Form and Identity), and NDDC Part 2 guidance notes (including Context Identity and Built Form).
- 2.3.4 The NDG including
- Context C1: Understand and relate well to the site. Its local and wider context).
 - Context C2: Value heritage, local history, and culture
 - Identify I1: Respond to existing local character and identity
 - Identity: I2 Well-designed, high quality and attractive places and buildings
 - B2: Appropriate building types and forms (e.g., para 70-71)
- 2.3.5 NMDC Part 1
- Built Form (especially viii and ix)
 - Identity (especially Tall Building Design Principles page 24)
- 2.3.6 NMDC Part 2
- Built Form B2iii height especially paras 116-118.
 - Identity, especially section 49 (page 48), Tall Building Design Principles

2.4 Local Plan

2.4.1 Evidence will point to failure to meet the following local Plan policies cited in RR1 and RR2:

EN1: Protection and Enhancement of the Historic Environment (cited in RR2 only)

2.4.2 Evidence will demonstrate that the setting of listed buildings and structures forming the setting of Station Square (South) will be harmed by over-scaled development- particularly proposed tall buildings.

2.4.3 Policy EN 1 states the setting of the historic environment will be protected and, where possible enhanced.

2.4.4 Evidence will demonstrate how the scale of development and proposed tall buildings will harm and adversely impact elements that contribute to the setting of buildings and structures of special architectural and historic interest and do not, therefore, accord with EN1.

EN3: Enhancement of Conservation Areas (cited in RR2 only)

2.4.5 Evidence will demonstrate that the Market Place conservation area's setting will be harmed by the intrusion of bulky tall buildings in views from the area. This does not accord with EN3, which states the special interests, character and architecture of conservation areas must be conserved and enhanced.

EN5: Protection of Significant Views with Heritage Interest (cited in RR2 only)

2.4.6 New development (including tall buildings) should not harm and, where possible, positively contribute to views of acknowledged historic significance.

2.4.7 Evidence will consider several views of Central Reading (drawing in part of the Appellant's EA Volume 2A part 1A -Townscape and Visual), particularly the station area, and both longer and shorter distance views that are important (para. 4.4.44 and RSAF Ch 7). This will include RSAF View 58 Station Road and 54 Blagrove Street and View 56 Duke Street and Market Place (RSAF Fig 7.2 Shorter-distance views) and views 5, 10 and 25 from the EA Volume 1a Townscape and Visual.

- 2.4.8 Evidence will demonstrate how the proposals fail to protect and will not enhance significant views with heritage interest.

CR2: Design in Central Reading

- 2.4.9 Evidence will demonstrate how the proposed tall buildings will disrupt the sense of continuity of the townscape, create a harmful sense of enclosure, are out of scale, poorly frame the surrounding public realm, and fail to consider the combined effects of adjacent development sites.

CR3: Public Realm in Central Reading

- 2.4.10 CR3 requires that proposals make a positive contribution to the public realm's quality. Evidence will consider the impact of each proposed tall building on the adjacent public realm within and surrounding the Site. It will show how the proposed tall buildings erode and will not positively contribute towards the quality of the public realm of the central area in important respects and, therefore, do not accord with CR3.

CC7: Design and the Public Realm

- 2.4.11 CC7 requires high-quality public realm design. Proposals should be assessed against five main components of development form, including 'Scale, height and massing'.

Development should be visually attractive due to high quality-built forms and spaces.

- 2.4.12 The evidence will assess the proposed tall buildings against their impact on the public realm. It will present findings that the proposed tall buildings do not respond positively to the local context and will erode the value of the current and planned public realm within the Appeal Site and the surrounding area.

H2: Density and Mix

- 2.4.13 Policy H2 defines criteria that inform appropriate residential density, including the efficient use of the land, the need to achieve a high-quality design and minimising environmental impacts.

- 2.4.14 The evidence will demonstrate how the Appellant has taken high density (defined in the LP and RSAF) as an entitlement -whilst failing to fully weigh other considerations,

particularly the character of the surrounding areas and other site-specific sensitivities (para. 4.4.7).

CR10: Tall Buildings

- 2.4.15 It will be demonstrated that the location height and form of tall buildings form does not take full account of the guidance set out within Policy CR10: Tall Buildings. It will demonstrate that the Appeal Proposals fail to meet the 16 criteria set out at CR10(v) and do not follow the diagrammatic indication of principles in Figure 5.2 (siting, massing, separation/views, setbacks, form/silhouette).
- 2.4.16 CR10(a): Tall Buildings, Station Area Cluster (specifically cited in RR1 only) places a series of requirements on Tall Buildings around the Station, including the southeast quadrant of the Appeal Site. Evidence will demonstrate how the Appeal Proposals fail to apply the four bullets listed.
- 2.4.17 Para.5.3.45 lists *'design solutions that can be used to assist in creating a human-scale street environment'*. Evidence will examine why the Appeal Proposals fail to adopt some of the design solutions listed - and therefore prejudice the creation of a human-scale street environment.

CR11: Station/River Major Opportunity Area and CR11e: Station/River Major Opportunity Area, North of Station

- 2.4.18 The Appeal Site is located within Sub-area CR11e of the Station/River MOA.
- 2.4.19 This accepts the principle of tall building development through the provision of indicative development densities for the Appeal Site (SOC Appx.3 para 5.18)
- 2.4.20 Height and the design code and transition: It will be demonstrated that the proposed development fails responds positively to Policy CR11e through the provision of the Design Code as the Appellant claims (SOC Appx.3 para 5.18). The proposals do not accord with CR11e. Further, the Appellant claims the Design Code *'prescribes for a development that will create a transition between the existing built form to the north and west of the Appeal Site, through the provision of taller buildings located adjacent to the railway line and lower built form with pitched roofs along Vastern Road'* (SOC Appx.3

para 5.18). Evidence will demonstrate that the Illustrative Scheme, Parameter Plans, and the Design Code together fail to prescribe this approach height and massing arrangement.

2.5 **RSAF**

2.5.1 The RSAF Chapter 6 recognises that tall buildings can potentially contribute to and not harm the urban character (RSAF para.6.3). The framework explores a series of organising principles to guide and control tall buildings in the Station Area summarised in RSAF Figures 6.3 and 6.4.

2.5.2 The proposed heights contradict RSAF guidance. The 'three-fold approach' to density, height and massing has not been followed. The combined effect of the resulting scheme's proposed height, density, and mass is considered unacceptable.

2.5.3 The reasons for the reinterpretation and misapplication of the policy have not been presented, whilst the Illustrative Scheme (DAS Chapter 6) raises significant concerns that the development in accordance with the Framework and Design Code will result in harm.

2.6 **Benchmark heights and Landmark buildings**

2.6.1 The RSAF sets out benchmark heights on a plot-by-plot basis ranging from 6 storeys in the north-western corner to at least ten storeys in the south-eastern corner (RSAF Fig. 6.9).

2.6.2 Figure 6.9 also provides guidance on the siting of landmark buildings and those plots where landmark buildings are not envisaged. Landmarks may exceptionally 'puncture' the benchmark heights (RSAF para.6.26)

2.6.3 The Appellant concedes the proposed development exceeds the Figure 6.9 benchmark and landmark guidance (SOC Appx.3 para 5.28). They argue the Appeal Scheme offers a 'progression in height across the site' and 'a gradual and sympathetic increase rather than a more dramatic step change to a landmark building at the station entrance'. (SOC Appx.3 para 5.2).

2.6.4 The approach to the Appeal Scheme conflates the two organising principles - benchmark and landmark heights -to the extent that they are dissolved into one. This is founded on a fundamental misunderstanding that the maximum possible scale is generally supported - rather than conditional.

2.6.5 The Appellant emphasises that “Benchmark heights may be modified upwards (RSAF para. 6.23) but then fails to mention the corollary -that they may need to be modified downwards (SOC Appx.3 para 5.6). The Appeal Scheme, Parameter Plans and Design Code do not carry forward this conditionality.

2.7 Reading Tall Buildings Strategy

2.7.1 The RTBS identifies a series of Character Areas (CA) for detailed assessment. The Appeal site sits within the north western quadrant of CA 22: Vastern Road. The RTBS (2018) states CA22 has a low townscape sensitivity to tall building development due to the absence of any key views or visual focal points whilst development should respond in terms of height and scale to the adjacent residential area, with tall structures being located to the south of the CA22, adjacent to the railway line.

2.7.2 The Appellant has misrepresented the CA22 Comments in the original RTBS and Update Note. The 2018 Note states: Townscape sensitivity remains **low**, albeit with the caveats expressed in 2008 continuing to apply.

*The large block size which exists within the character area and the absence of any key views or visual focal point makes this an appropriate location for tall buildings. However it is proposed **that tall structures should not be developed along the north and western boundaries of the character area** as these boundaries are shared with small scale residential areas. Any proposed built form should respond in terms of height and scale to the residential area. The tallest structures should be located to the south of the character area, adjacent to the railway line. In this area the townscape features are larger scale, and adjacent to large scale features outside of the area e.g. existing station buildings, Thames Tower and Western Tower. (my emphasis) RTBS Page 20 and RTBS (2018) page 44.*

- 2.7.3 The Appellant SOC (SOC Appx. 3 para. 5.5) omits the second, crucial sentence and ignores the guidance that tall buildings should be located **adjacent** to the railway.
- 2.7.4 The definition of 'adjacent to the railway' is stretched to include the greater part of the Appeal Site.
- 2.7.5 The Appellant draws on a misinterpretation of the RTBS to justify tall buildings within each of the proposed development plots A-D (SOC Appx.3 para 5.5). This contradicts the RTBS guidance that tall buildings should be located to the south of the CA22 (i.e., the south east and south west quadrants).
- 2.7.6 Evidence will be presented to downstate how the Appeal Proposals fail to adhere to best practice principles of design set out at RTBS section 6.2 Principles, 6.3 general Principles, and 6.4 Site Specific Principles.
- 2.8 **Overall massing**
- 2.8.1 The Appellant's broad massing strategy is to locate the tallest part of the proposed development located on the south-east corner of the Appeal Site, closest to the centre of the Station Area Cluster and closest to the station, stepping down in height towards existing residential properties (SOC Appx.3 para 5.28).
- 2.8.2 It will be demonstrated that, even at the broadest level, the Appeal Scheme, the Parameter Plans, and the Design Code fail to reflect policy (CR10, CR11, RTBS and RSAF). The shifts in height from north and east to the south east corner of the Appeal site are cliff-faces, not a progression. Building heights on Caversham and Vastern Road, the starting point for the increasing heights, are too great and harm the setting of adjacent residential properties. This approach will not provide the 'additional legibility' to this location the Appellant claims (SOC Appx.3 para 5.21).
- 2.8.3 Evidence will contradict the Appellants case on massing - that the composition and massing of the development align with the policies in place and help create a cluster of buildings that work together to help define Reading Town Centre and the station area (SOC Appx.2 para. 2.4.1).

2.8.4 Evidence will be presented to demonstrate that the Parameter Plans and Design Code will not offer sufficient control at the Reserve Matter stage to ensure buildings and massing that is inherently capable of delivering buildings that are elegant in proportion and composition, as the Appellant claims (SOC Appx.2 para. 4.3.4).

2.9 Adjacent residential and historic core areas

2.9.1 The RSAF requires that a 'Transition Zone' (or 'buffer zone') is formed towards adjacent areas (particularly the historic core of the town and low-rise residential areas to the west and north) (RSAF para. 6.29). Heights should step down to relate appropriately to surrounding development and residential areas. RSAF Figure 6.10 defines areas with '*particular sensitivity*' to the effects of tall buildings and areas where listed buildings and public spaces combine to create places where special control should be exercised. This includes views to, from and across these places.

2.9.2 As noted above, the RTBS (CA:22) expressly prohibits tall buildings along the northern and western boundaries '*as these boundaries are shared with small-scale residential areas*'. It goes on to state; '*any proposed built form should respond in terms of height and scale to the residential area*' (RTBS Appx. 1 page 29 and RTBS 2018 Update page 44).

2.9.3 The Appellant acknowledges the need for this buffer zone (SOC Appx.2 para. 3.4) and claims, '*The proposed maximum height parameters provide reduced height along the Vastern Road frontage, to respect the existing residential properties on the northern side of Vastern Road*' (SOC para. 5.17).

2.9.4 Evidence will be presented to demonstrate that guidance on scale and height along the northern and west site boundaries, adjacent to low-rise residential areas, has not been followed. The development does not respond in terms of height and scale, and the resulting scale of development will harm the setting and amenity of these areas.

2.10 Legibility

2.10.1 The RSAF proposes a cluster of tall buildings around the 'station nexus' (RSAF 6.12) to mark the station as an important place and landmark (RSAF 6.15). CR10a states the new

Station Area Cluster should '*signify the status of the station area*', act as '*the main gateway*' and contribute to the creation of a '*coherent*' cluster (CR10a)

- 2.10.2 Evidence will demonstrate that the tallest element of the proposed development will not reinforce the location of central Reading and mark the location of Reading Station, and erode legibility (SOC 5.24).
- 2.10.3 Evidence will demonstrate how the Appeal proposal erodes legibility in several ways:
- The Appeal scheme scatters tall buildings across the site rather than contributing to a distinct cluster of tall buildings in the vicinity of the Station to '*signal the status of the station area*'.
 - The relationship of buildings with those to the north side of the railway line is insufficiently subservient so that the station nexus on the south side of the railway is less clear.
 - Legibility will be eroded because the distances between tall buildings and building massing result in an overly dense townscape in which individual buildings are insufficiently distinct. Tall buildings will read as a single slab of towers with routes through the area unmarked on the skyline.
- 2.11 **Development plots**
- 2.11.1 The siting, height and likely massing of proposed Tall Buildings within Plots A, B, C and D are bulky harmful to the setting and the character of the surrounding area and public spaces.
- 2.11.2 Evidence will be presented to contradict the Appellant's claim that composition of the development parcels and their respective heights, and the scale and nature of the spaces in between, are all in accordance with the policy aspirations of Reading Borough Council" (SOC Appx.2 para. 4.2).
- 2.12 **Amended scale and heights**
- 2.12.1 The LPA raised concerns in relation to height, tall building footprints and open space. In response, the Appellant lowered the height of Block D by 14m and amended the tall building footprint. The Appellant now claims this will be '*clearly subordinate in scale to*

the taller buildings desired on the North side of the station by RBC' (SOC Appx.2 para 5.2). The footplate of plot D was also revised and reduced. The Appellant claims this will 'meet with the RBC aspirations'. (SOC Appx.2 para 5.5).

2.12.2 Evidence will examine the marginal effects of these changes, which fail to address the fundamental concerns on height- consistently expressed by the LPA from an early stage.

2.13 Historic England

2.13.1 Drawing on the objection raised by Historic England, and with reference to HE Advice Note 4: Tall Buildings, it will be demonstrated the development fails to achieve the high standard of design expected of tall buildings in the vicinity of historic buildings and areas. This fundamentally conflicts with CR10(v) bullets 4 and 6, RSAF (including paras. 3.7, 6.29, 6.33 and 12.3), RSAF Figure 6.10, RTBS 6.3 bullet 8 and Implications (page 14).

2.14 Tall buildings and public spaces

2.14.1 Evidence will be presented that demonstrates unacceptable detrimental effects on the townscape, the surrounding area, and the setting of public spaces - particularly Station Square North and Station Square South.

2.15 Relationship to SSE (CR11g)

2.15.1 The Appellant claims there is 'ample distance separation between proposed new buildings, as Vastern Road lies between the SSE site and the Application Site'. (SOC Appx.2 para. 4.8.3). The Appellant states that the maximum heights of Plots B and C have been restricted to ensure no unacceptable impacts on daylight and sunlight.

2.15.2 Evidence will point to fundamental concerns with the height and relationship of Appeal Site Plots B, C and D and proposed SSE Plots A (The Railway Warehouse -including the Locally Listed Building) and Plot B 'The Goods Warehouse'.

2.15.3 This widens into a concern with the relationship of proposed building heights when considered alongside the potential alignment (and realignment) of the North-South Link (RR 3 and Chapter 4 below) as it passes between the Appeal Site and the SSE site.

2.16 The established scale of development in Reading Town Centre

2.16.1 The Appellant claims the Appeal Site lies within a very well-established framework of 'significant large-scale built development land uses' (Sovereign House, Clearwater Court, Reading Bridge House, Napier Court), surrounded by residential development (SOC Appx.3 para 5.15).

2.16.2 It will be demonstrated that the scale of the Appeal Proposals does not follow from the established scale of development in Reading Town Centre today and considering planned, proposed, and consented development.

2.17 Tall buildings in Reading Town Centre

2.17.1 The Appellant proposes to draw on the precedent of tall buildings in the town centre, including Thames Tower (16 commercial storeys), The Blade (13 commercial storeys) and Thames Quarter (23 residential storeys). The Appellant also proposes to draw upon examples of tall buildings under construction or planned to include Station Hill at 18 commercial storeys (SOC Appx.3 para 5.15).

2.17.2 It will be demonstrated that examples of tall buildings in Reading Town Centre, including those under construction, do not support the case for the Appeal Scheme and the proposed siting, height, massing, and form of tall buildings.

2.18 Height Parameter Plans

2.18.1 The Appellant has failed to demonstrate that the proposed maximum height parameters are appropriate to the site context and relevant planning policy (SOC para. 5.17). They do not accord with the RSAF (SOC para. 5.17).

2.18.2 The proposed maximum height parameters will only deliver reducing height across the site (east to west) where every plot is developed to the maximum permissible height, which is undesirable for the reasons set out in evidence (SOC para. 5.17).

2.19 Design code

2.19.1 The Appellant's case is that the proposed development responds positively to Policy CR11e through provision of the Design Code, which prescribes for a development that will create a transition between the existing built form to the north and west of the

Appeal Site, through the provision of taller buildings located adjacent to the railway line and lower built form with pitched roofs along Vastern Road. (SOC Appx.3 para 5.18).

2.19.2 This clearly indicates the Appellant's desire to postpone consideration of fundamental massing issues to the Reserve Matters stage.

2.19.3 Evidence will demonstrate that the Design Code will be ineffective in controlling massing at the Reserve Matters stage.

2.20 Summary and conclusions

RR1: Scale, height, and massing

2.20.1 In summary, RR1 details how the proposed heights exceed Local Plan and RSAF height and massing guidance. This will result in unacceptable detrimental effects on the townscape, the surrounding area and the setting of adjacent public spaces.

2.20.2 The RSAF sets out a 'three-fold approach to controlling density, height and massing. This includes benchmark heights on a plot-by-plot basis ranging from 6 storeys in the north-western corner to at least ten storeys in the south-eastern corner (RSAF Fig. 6.9). The 'three-fold approach' to density, height and massing in the RSAF has not been followed. The Appellant's approach is founded on a fundamental misunderstanding that the maximum possible scale is generally supported - rather than conditional. The resulting building heights contradict RSAF guidance.

2.20.3 The proposed heights in the Illustrative Scheme and height Parameter Plan raise significant concerns that the development will harm the townscape and views. The shifts in height from north and east to the south east corner of the Appeal site are cliff-faces, not a progression. Building heights on Caversham and Vastern Road, the starting point for the increasing heights, are too great and harm the setting of adjacent residential properties. It will be demonstrated that the Appeal Proposals results in sharp increases in height rather than a gradual and sympathetic progression.

2.20.4 The setting of listed buildings and structures forming the setting of Station Square (South) will be harmed by over-scaled development- notably proposed tall buildings.

- 2.20.5 Evidence will demonstrate how the Parameter Plans and Design Code do not offer sufficient control at the Reserve Matter stage to ensure building heights and massing will be proportionate to the setting.
- 2.20.6 The RSAF requires that a 'Transition Zone' (or 'buffer zone') is formed towards adjacent areas where heights should step down to relate appropriately to surrounding development and residential areas. RSAF Figure 6.10 defines areas with 'particular sensitivity' to the effects of tall buildings and areas where listed buildings and public spaces combine to create places where special control should be exercised. The guidance on scale and height along the northern, western, and south eastern site boundaries, adjacent to low-rise residential areas, has not been followed. The development does not respond in terms of height and scale, and the resulting scale of development will harm the setting and amenity of these areas.

RR2: Tall buildings

- 2.20.7 In summary, RR2 details how the siting, height and likely massing of proposed tall buildings fail to meet Tall Building design standards and will be harmful to the setting and the character of the surrounding area and public spaces.
- 2.20.8 It will be demonstrated that the location, height, and form of tall buildings do not fully account for the guidance set out within the National Design Guide, LP Policy CR10, the RSAF, RTBS, and Historic England Guidance.
- 2.20.9 The proposed tall buildings will harm and adversely impact elements that contribute to the setting of buildings and structures of special architectural and historic interest. They will disrupt the sense of continuity of the townscape and create a harmful sense of enclosure. They will appear out of scale and poorly frame the surrounding public realm.
- 2.20.10 The Appeal Proposals fail to adhere to best practice principles of design in RTBS section 6.2 Principles, 6.3 general Principles, and 6.4 Site Specific Principles.
- 2.20.11 The RTBS (2018) requires that tall structures are located to the south of the Station/River MOA adjacent to the railway. The Appeal Scheme proposes tall buildings across all four proposed plots. The definition of 'adjacent to the railway' is stretched to include the greater part of the Appeal Site.

- 2.20.12 The Appeal proposals erode legibility by scattering tall buildings across the site rather than contributing to a distinct cluster of tall buildings in the vicinity of the Station to signal the status of the station area. The visual relationship of buildings with those to the north side of the railway line is insufficiently subservient. Distances between tall buildings and building massing result in an overly dense townscape in which individual buildings are insufficiently distinct. Tall buildings will read as a single slab of towers with routes through the area unmarked on the skyline.
- 2.20.13 The development fails to achieve the high standard of design expected of tall buildings near historic buildings and areas and public spaces, which fundamentally conflicts with policy and guidance.
- 2.20.14 The Appellant has failed to demonstrate that the proposed maximum height parameters are appropriate to the site context and relevant planning policy.
- 2.20.15 Evidence will demonstrate that examples of tall buildings in Reading Town Centre, including those under construction, do not support the case for the Appeal Scheme and the proposed siting, height, massing, and form of tall buildings.
- 2.20.16 The Parameter Plans Design Code will be ineffective in controlling height and massing at the Reserve Matters stage.

3 Setting/Views

3.1 RR 3. Views and townscape

The proposed siting, maximum heights, and likely massing of tall buildings within Plots C and D will appear bulky and over-dominant resulting in a detrimental impact on the skyline and harm to short and medium distance views including along Station Road, the setting of Station Square (North and South) and surrounding buildings and structures. Therefore, the development is contrary to NPPF Section 12, Reading Borough Local Plan Policies (2019) Policies CC7, H2, EN1, EN3, EN5, EN6, CR2, CR3, CR10 and CR10e, CR11 and Section 12 and 16 of the NPPF, The Reading Tall Buildings Strategy, and the Reading Station Area Framework (2010).

3.2 RR 5. Heritage

By virtue of the proposed maximum height and siting of Blocks C and D the proposal would result in a detrimental effect on the setting of and therefore, the significance of the Grade II listed Main building of Reading General Station, the Market Place/London Street Conservation Area, and the Grade II Town Council Chamber. The public benefits of the proposals are not considered to outweigh the less than substantial harm caused to the significance of these designated heritage assets. Therefore, the development is contrary to Reading Borough Local Plan (2019) Policies EN1, EN3, EN5, EN6, The Reading Tall Buildings Strategy, The Reading Tall Buildings Strategy Update Note 2018, and the Reading Station Area Framework (2010) and Section 16 of the NPPF.*

3.3 NPPF

3.3.1 Planning decisions should ensure that (a) developments are visually attractive because of good architecture, layout, and appropriate and effective landscaping and (c) sympathetic to local character and history, including the surrounding built environment and landscape setting (NPPF para. 130).

3.3.2 Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design (paragraph 134)

- 3.3.3 The NPPF Para 129 states that Design codes should consider the guidance contained in the National Design Guide and the National Model Design Code. Significant weight should be given to (a) development which reflects local design policies and government guidance on design, considering any local design guidance and supplementary planning documents such as design guides and codes (paragraph 134).
- 3.3.4 In determining applications, local planning authorities should take account of a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation and (c) the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 197):
- 3.3.5 Evidence will point to a failure to apply National Design Guidance (see below), failure to follow local design policies and SPD (LP and RSAF) and failure to enhance the visual setting of heritage assets.

3.4 National Design Guidance

- 3.4.1 The National Design Guide require that development understand and relate well to the Site, its local context and wider context(C1); proposes appropriate building types and forms (B2); responds to existing local character and identity (I1) and offers well-designed, high quality and attractive places and buildings (I2).
- 3.4.2 Evidence will refer to sections of the NDG and NMDC Parts 1 and 2 listed in Section 2.5 above.

3.5 Local Plan

- 3.5.1 Evidence will examine the proposals considering LP policies cited in RR 5 and 6 and demonstrate that the proposals do not accord with policy.

CC7: Design and the Public Realm (cited in RR3 only)

- 3.5.2 CC7 requires that development maintain and enhance the character and appearance of the area in which it is located. The components of the development form to be assessed to ensure a positive contribution include 'Scale: height and massing'. Urban design objectives set out in CC7 include the quality of the public realm, continuity and

enclosure, permeability, and legibility. Qualities to be ensured include responding positively to the local context, reinforcing local character and distinctiveness, protecting, and enhancing the historic environment and providing value to the public realm.

3.5.3 Evidence will demonstrate the Appeal Proposals damage the quality, character, and visual amenity of the public realm, particularly Station Road, Station Square (South) and Station Square (North).

3.5.4 Evidence will demonstrate how the station square (south) and the framing of the historic station entrance and clock tower are key visual components of a legible environment, which the Appeal Scheme erodes.

H2: Density and Mix (cited in RR3 only)

3.5.5 H2 requires that the appropriate density should be informed by a consideration of nearby heritage assets or important landscape or landscape areas and the need to minimise environmental impacts (which includes visual impacts).

3.5.6 Evidence will demonstrate that Plots C and D densities (generally within LP and RSAF density ranges) results in a quantum of development, height and massing that is harmful to views. The proposed density has not been fully informed by other design considerations and the Parameter Plans and Design Code offer insufficient control of such matters at the Reserve Matters Stage.

EN1: Protection and Enhancement of the Historic Environment (not referenced in Appellant 's main SOC) (cited in RR3 and RR5)

3.5.7 EN 1 states the setting of the historic environment will be protected and, where possible enhanced. Proposals should seek to avoid harm and adverse impacts to elements that contribute to the special architectural or historic interests, including the setting where appropriate.

3.5.8 Evidence will demonstrate that the setting of listed buildings and structures forming the setting of Station Square (South) will be harmed.

EN3: Enhancement of Conservation Areas (cited in RR3 and RR5)

- 3.5.9 Conservation areas' special interests, character, and architecture must be conserved and enhanced.
- 3.5.10 The Application Scheme will be visible from the Market Place Conservation. Evidence will demonstrate that the setting of the conservation areas will be harmed by the intrusion of bulky tall buildings in views from and across the conservation area.

EN5: Protection of Significant Views with Heritage Interest (cited in RR3 and RR5)

- 3.5.11 New development should not harm and, where possible, make a positive contribution to views of acknowledged historical significance. The policy supporting text (para.4.2.22) refers to several views of Central Reading, in particular the station area, and both longer and shorter distance views that are important (RSAF Ch 7).
- 3.5.12 The Appellant has identified View 58 Station Road and 54 Blagrave Street (RSAF Fig 7.2 Shorter-distance views) for further study (EA Volume 1a Townscape and Visual TVIA Figure 5 Views 10 and 25). However, the Appellant has not examined RSAF View 56 Duke Street and Market Place (because it falls outside the Appellant's selection isochrone).
- 3.5.13 With reference to RSAF short-distance views 58 and 56. my evidence will demonstrate how the proposals fail to protect significant views with heritage interest.

EN6: New Development in a Historic Context (cited in RR3 and R5)

- 3.5.14 New development should respect and enhance the visual qualities of areas characterised by heritage assets. Heritage considerations should influence the design of new development, including significant vistas and views.
- 3.5.15 Evidence will demonstrate how the Appeal Proposals do not follow from an understanding of the visual qualities of the view of the historic station entrance building, which can be characterised as a significant view or vista.

CR2: Design in Central Reading (cited in RR3 only)

- 3.5.16 CR2 states applications for development should provide continuity and enclosure through appropriate relationships between buildings and spaces.
- 3.5.17 Evidence will demonstrate how the siting, heights, and likely massing of tall buildings within Plots C and D will harm the setting of Station Square (North and South) and surrounding buildings and structures -and townscape as a whole- because they strike the wrong balance between continuity and enclosure of views.

CR3: Public Realm in Central Reading (cited in RR3 only)

- 3.5.18 Evidence will demonstrate the Appeal Proposals cannot accord with CR3, which requires that new development make a positive contribution to the quality of the public realm.

CR10: Tall Buildings (cited in RR3 only)

- 3.5.19 Evidence will demonstrate how the siting, heights, and likely massing of tall buildings within Plots C and D fail to create a coherent and attractive cluster of tall buildings with a high-quality public realm and do not, therefore, accord with CR10. Inadequate gaps between buildings result in creating an overly dense townscape eroding the possibility that buildings may be viewed as individual forms framing views and public space.
- 3.5.20 The requirements of CR11(v), particularly bullets 1 (skyline), 2 (street environment), 3 (views), 4 (context), 5 (massing), 6 (heritage) and 8 (public realm) are not met.

CR11: Station/River Major Opportunity Area (cited in RR3 only)

- 3.5.21 The view of paramount concern in this Appeal is from Station Road/Station square South towards the Appeal Site. This view travels across or is framed by several sub-areas within the Station/River MOA.
- **CR11a Friar Street and Station Road:** Highlights that listed buildings and their setting will be conserved and north-south linkages enhanced.
 - **CR11d: Brunel Arcade and Apex Plaza:** States development should enhance the setting of nearby heritage assets and views from within the conservation area, and Forbury gardens should be carefully considered.

- **CR11e: Station/River Major Opportunity Area, North of Station:** Refers to the new Station Square (north) and a high-quality route incorporating a green link to the Thames.

3.6 Reading Station Area Framework

3.6.1 RSAF guidance on the height of Plots C and D (equivalent to RSAF Plots N5 and N6) is set out in Figures 6.8 and 6.9. There are, however, vital caveats.

- Benchmark heights are not guarantees and may be modified downwards where buildings affect important views (RSAF para. 6.24).
- Building heights should have regard for the qualities of buildings and areas of architectural and historic interest (RSAF para. 6.27).
- A transition zone should be formed towards the town's historic core with heights stepping down (RSAF 6.29).

3.6.2 RSAF Chapter 7 recognises that planned development will significantly affect views within the Station Area (para. 7.1). The framework requires key views, and potential views should be considered (para.7.2). The emphasis will be on ensuring that, where development is visible, it makes a positive contribution to the view (para. 7.7). Paragraph 7.9 points views of particular sensitivity marked in red in Figure 7.2 (the most relevant to Plots C and D views being 54, 56, and 58).

3.6.3 Evidence will demonstrate that the Parameter Plans and Design code fail to reflect and work against the RSAF guidance on views.

3.6.4 RSAF Views 62 and 63 (para. 7.10) - views along the North-South Link will be considered in Chapter 4 on the alignment of the link.

3.7 Reading Tall Buildings Strategy

3.7.1 RTBS is cited in RR3, but not 4.

3.7.2 The RTBS proposes a Station Area Tall Building Cluster (Character Areas 2,12, and 22). Section 5.2 confirms detailed design criteria that should be considered during the decision-making processes

- Design criteria should be considered in all stages, from initial proposal to planning approval.
- It is appropriate for the entire area to be developed with buildings over ten storeys.
- It is necessary to adhere to best practice principles of urban design set out at RTBS 6.2 Principles, 6.3 general Principles, and 6.4 Site Specific Principles.

3.7.3 The RTBS assesses a series of Character Areas in terms of the baseline (RTBS 5.1) and townscape (RTBS 2.1).

- **CA1: Station Hill.** No key views identified. Tall building development should seek to mitigate potential visual effects on surrounding sensitive heritage features. Large block size and occasional tall buildings, the tallest Thames Tower (11 storeys) and (the now demolished) Western Tower (17 storeys) creates a large townscape scale. CA4 Station Road (page 11) confirms the open skyline is a fundamental feature of the (Market Place) Conservation Area's character.
- **CA4 Station Road.** High townscape sensitivity. Key townscape features provide a focus to views both to the north and south along Station Road. To the north, the original station building is visible.
- **CA6: St Lawrence and Market Place.** There is no capacity to develop tall structures in this character area. The low-rise open skyline above the buildings is a fundamental element of the historic character.
- **CA22: Vastern Road.** There are no key views that the development of tall buildings could block. Townscape sensitivity to the inclusion of tall buildings is low. The absence of any key views or visual focal points makes this an appropriate location for tall buildings. The townscape features are larger scale, and the adjacent to large scale features outside the area e.g., existing station buildings, Thames Tower, and Western Tower.

3.7.4 View and visual experience (RTBS section 03, 3.2.1) defines 'key views' within Central Reading, including: **Viewpoint B-** The prominent position of the two towers and surrounding lower rise skyline has a high sensitivity to the introduction of tall buildings.

3.7.5 The RTSB findings will be interpreted (and updated where appropriate) to demonstrate that the Appeal Proposals fail to take account of the RTBS findings and guidance- including 6.3 bullets 2 (skyline) and 4 (views) and more detailed guidance on Skyline and views (RTBS page 42) Public Realm (also page 42).

Site-specific principles

3.7.6 RTBS Section 6.4 presents site-specific principles (page 45-47) for the Station Area Cluster, including:

- There should still be adequate space between the buildings to allow for light to reach the streets and spaces so that the buildings can be distinguished from each other when viewed from a distance.
- Where possible, the upper, taller part of buildings should be placed away from affected streets and open space and be of a smaller floor plate that results in slender buildings which allows for more sunlight, improves views of the sky, and permits better views between buildings and through the site.
- At the upper levels, boxy and slab-like massing should be avoided, and massing should reflect a slender and elegant form that is able to contribute to an attractive skyline as well as present a more human scale at street level.
- When siting buildings that have elongated slab floor plates, they should normally be orientated approximately North-South to reduce overshadowing.

3.7.7 Evidence will demonstrate how the Appeal proposals fail to accord with RTBS guidance. The Parameter Plans and Design Code also fail to reflect design principles for the cluster.

3.8 Historic England comments

3.8.1 Evidence will support and amplify Historic England's (and RBC Heritage Officer's) concern that long-range views of blocks C and D are not sufficiently explored with regards to their relationship and impact on the view of the listed station building. This will also refer to the Council's heritage expert witness as necessary.

3.8.2 It will be demonstrated that the Appellant's claim that both residential and office options have not been sufficiently developed to properly visualise the relationship with

the setting of heritage assets (SOC Appx.2 para 5.6.1). Evidence will demonstrate Montague Evans' assessment of the townscape relationship misunderstands and underestimates the townscape effects.

3.8.3 The Appellant claims the policy framework for the site inevitably places a larger building at the station end of the site, which will always be visible from the South side of the tracks 'unless the scale of any building was significantly reduced, in contradiction with the policy position' (SOC Appx.2 para 5.6.1). These claims will be disputed.

3.8.4 The Appellant mischaracterises the key issues in relation to views and heritage: 'The question is therefore not if one can see the buildings on plots C and D in the same view as the listed station building but what these buildings might look like' (SOC Appx.2 para 5.6.1). Evidence will demonstrate that policy and guidance provide no presumption in favour of tall buildings intruding into sensitive views. This is conditional. Where building intrude into the view, the many design requirements (National Design Guidance, CR10, ENV1, EN3, EN5, RTBS, RSAF etc.) amount to a coherent approach that the Applicant minimises as 'what these buildings might look like'.

3.9 **Historic England Practice Guidance (Advice Note 4, 2015, and current consultation draft)**

3.9.1 In March 2020, Historic England published an updated draft advice note to guide the planning and design of tall buildings (initially published in 2007 and was last updated in 2015 as 'Advice Note 4'). The guidance recognises that whilst tall buildings can positively contribute to city life, by virtue of their size and widespread visibility, they can also seriously harm the historic character of places. It highlights the importance of carefully considering historic context and protecting the historic environment, and the need for high-quality design and sustainable development.

3.9.2 Evidence will draw on the guidance to demonstrate that the Appeal Proposals do not accord with this guidance (Section 4 and 5 of the 2015 Guidance and the same sections in 'Second Edition: CONSULTATION DRAFT' 2020) drawing as necessary to the Council's heritage evidence as necessary.

3.10 Plots C & D - Position, footprint, and height

- 3.10.1 Plots C extends to approximately 3378 sq. m. Parameter Plan - Plots Heights (PP103) divides the plot in two. The south-west subplot extends to 1118 sq. m (33%) and may rise to 94.4m (equivalent to 19 residential storeys). The remainder of the plot to the north and east covers 2260 sq. m (67%) and rises to 79.1m (equivalent to 19 residential storeys).
- 3.10.2 Plot D extends to 2159 sq. m (including oversailing). Parameter Plan - Plots Heights (PP103) divides the plot in two. The more extensive southern subplot extends to 1739 sq. m (81%) and may rise to 112.9m (equivalent to 26 residential storeys). The smaller, northern sub-plot extends to 405 sq. m with a maximum height of 87.9 sq. m (equivalent to 17 residential storeys).
- 3.10.3 Evidence will be presented demonstrating that the proposed tall buildings footprints and maximum heights of Plots C and D fail to appreciate or protect or compose views and result in buildings that will appear bulky and over-dominant in key views.

3.11 Short and medium-distance views

Station Road and Station Square (South)

- 3.11.1 Evidence will demonstrate how the proposed development of Plots C and D will harm the view from Station Road and Square (South) and the setting of surrounding buildings and structures (RR3), including listed buildings (RR4).

Station Square (North)

- 3.11.2 Evidence will demonstrate that the proposals for the development of Plots C and D will harm Station Square (North) views and the setting of surrounding buildings and structures.

Skyline

- 3.11.3 CR11(v) bullets 1 requires tall buildings enhance Reading's skyline through a distinctive profile of careful design of the upper and middle sections of buildings.
- 3.11.4 Evidence will demonstrate that proposals for the development of Plots C and D will have a detrimental impact on the skyline of Central Reading.

3.12 LVIA

- 3.12.1 Evidence will demonstrate that the LVIA provides an unsatisfactory basis for adequately assessing the likely impact of the development.
- 3.12.2 Evidence will refer to EA Vol. 2 Part 1A Townscape and Visual, GLVIA (3) guidance and the related Visual Representation of Development Proposals Technical Guidance Note 06/19 17 September 2019 (TGN 06/19).
- 3.12.3 TGN 06/10 Table 1 (page 9) provides a broad indication of appropriate Visualisation Types for different purposes and users. The four Visualisation Types comprise:
- Type 1 annotated viewpoint photographs.
 - Type 2 3D wireline / model.
 - Type 3 photomontage / photowire;
 - Type 4 photomontage / photowire (survey / scale verifiable).
- 3.12.4 Table 1 indicates for 'Category A' (most EIA development and applications to be submitted to public inquiry), the appropriate visualisation type is in the range 2-4.
- 3.12.5 The Appellant has provided 'preliminary alignments' for some of the selected views in EA Vol. 2 1A Townscape and Visual. These show a 'photowire' (Type 3) outline mounted onto selected Verified Views to represent the maximum form and extent but not the appearance of the development. It is acknowledged (TGN 06/10 para. 4.1.1) that such views are not suitable for the most demanding and sensitive contexts.
- 3.12.6 The photowire Preliminary Alignments (lacking any indexing) describe the maximum development volumes shown on PP-102. Whilst any Reserve Matter Scheme may differ from this, the current Appeal must be determined on the assumption the development may be built out to the maximum amount indicated in the Parameter Plans to be approved at outline stage: The Design Scheme submitted by the Appellant is for illustrative purposes only and the Design Code mandatory guidance fails offer any lower limits.

3.13 Design code

- 3.13.1 Evidence will be presented that the Design Code controls omit any reference to protecting views. The various controls offered will be ineffectual in exercising control over and protecting views at the reserve matters stage.
- 3.13.2 The C and D Plot Design Code (pages 40-41) contain only two mandatory height requirements:
- The proposal should not exceed the height and location marked on PP-103_P2 - Parameter Plan - Plot Heights.
 - All rooftop servicing and cleaning equipment and building maintenance units should be concealed behind facade parapets and /or screening.
- 3.13.3 Discretionary 'plot layout and geometry' guidance for Block C states Part of the block could be a taller landmark building on the southwestern facade facing The Avenue. There is no equivalent guidance for Block D.
- 3.13.4 Mandatory site-wide design coding 5.1.6 requires avoidance of 'non-vertical building lines'- i.e., facades should be straight and vertical. However, in the following bullet point, a mandatory exclusion for tall buildings (all proposed development on Plots C and D) 'where this measure is justified through design and microclimate assessments.
- 3.13.5 Section 5.5 contains specific footprint, height, and massing guidance for tall buildings:
- 5.4.1 - Tall buildings must fit within development plots
 - 5.4.2 - Permanent features shall not exceed maximum heights.
 - 5.4.4 - Mandates that the average heights proposed per plot should decrease from East to West (from plot D to plot A) in keeping with the townscape requirements (as listed in local guidance) and contextual relationships.
 - 5.4.5 - Mandates that the design strategy for buildings must define a top, middle and base. It mandates (with conditional phrasing) that '*If sustained by design quality, a uniform approach should also be considered appropriate*'.

- 5.4.8 - Topes of tall buildings must provide clear articulation with roof and parapet treatments and geometries designed to mask and/or integrate any ancillary structures.
- 3.13.6 Section 5.9.5 (Office typology) -apparently focusing on Block D- contains a mandatory requirement. The buildings' appearance should be fragmented through materiality alternations or volume subtraction to avoid wall development and subject to daylight-sunlight assessments and privacy requirements
- 3.13.7 Section 5.9.7, Residential Typology, confirms: *'A landmark tower residential building is expected to be provided on the southwest corners of each perimeter block. This measure will improve visibility and orientation through the scheme'*.
- 3.13.8 The proposed siting and footprints of tall buildings within Plots C and D and minimal controls over massing will result in buildings that will appear bulky and over-dominant in views and result in harm.
- 3.14 **Reserve matters**
- 3.14.1 The Appellant case is that harmful changes in scale and the juxtaposition between the existing and proposed can be fully resolved through detailed design and a fully resolved architectural approach whilst identified heritage impacts could be further mitigated through the detailed design process at the reserved matters stage (SOC 5.30).
- 3.14.2 The LPA case is that scale and the juxtaposition between the existing and proposed townscape and views, and the visual setting of heritage are matters of principle that must resolved at the application stage. Avoiding harm to views and setting and the appropriateness and effectiveness of mitigation measures are matters of substance, not *'detailed design'* or left to the *'resolution of the architectural approach'*.
- 3.14.3 Evidence will demonstrate that, should the resolution of potential harm to views be left to the Reserve Matters stage, the Appellant's mechanisms for future control - The Parameter Plans and the Design Code secured through a planning condition- are inadequate and will severely limit the of the LPA's discretion to exercise full control over serious shortcoming in the Appeal Scheme at the Reserve Matters stage.

3.15 Summary and conclusions

RR 3. Views and townscape

- 3.15.1 In summary, RR3 details how two of the four proposed tall buildings will have a detrimental impact on the skyline and harm to short and medium distance views.
- 3.15.2 It will be demonstrated that the height, massing and the likely appearance of Plots C and D will harm the view from Station Road and Square (South), the setting of surrounding buildings and structures (including listed buildings) and the Reading skyline. Buildings that will appear bulky and over-dominant in key views.
- 3.15.3 The station square (south) and the framing of the historic station entrance and clock tower are key visual components of a legible town centre environment. The Appeal Proposals damage the quality, character, and visual amenity of the public realm, particularly Station Road, Station Square (South) and Station Square (North).
- 3.15.4 Evidence will show how the proposals fail to create a coherent and attractive cluster of tall buildings framing the public realm. They do not, therefore, accord with LP CR10. Inadequate gaps between buildings result in overly dense townscape, eroding the possibility that buildings may be viewed as individual forms framing views and public space.
- 3.15.5 It will be demonstrated that policy and guidance provide no presumption favouring tall buildings intruding into sensitive views: This is conditional.
- 3.15.6 The Appeal Proposals fail to take account of the RTBS findings and guidance- including 6.3 bullets 2 (skyline) and 4 (views) and more detailed guidance on Skyline and views (RTBS page 42) Public Realm (also page 42) RTBS Section 6.4 - site-specific principles for the Station Area Cluster.
- 3.15.7 Where a building is permitted to intrude into the view, the many design requirements (National Design Guidance, CR10, ENV1, EN3, EN5, RTBS, RSAF etc.) need to be met. Evidence will demonstrate how the Appeal Proposals fail to meet these requirements. The intrusion of buildings into views should not, therefore, be permitted.

- 3.15.8 The Appellant's LVIA (EA Vol. 2 Part 1A Townscape and Visual) provides an unsatisfactory basis for adequately assessing the likely impact of the development on views. The Appellant has provided 'preliminary alignments' for some selected views. The 'photowire' views are unsuitable for the most demanding and sensitive contexts.
- 3.15.9 The Appellant 'Design s Code controls omit any reference to protecting views. The various controls offered will be ineffectual in exercising control over and protecting views at the Reserve Matters stage. The Parameter Plans and the Design Code secured through a planning condition- are inadequate and will severely limit the the LPA's discretion to exercise full control over serious shortcomings in the Appeal Scheme at the Reserve Matters stage.

RR 5. Heritage

- 3.15.10 In summary, RR5 details how two of four proposed tall buildings will negatively impact the setting of nearby listed buildings.
- 3.15.11 It will be demonstrated how the proposals do not follow from an understanding of the visual qualities of the view of the historic station entrance building, which can be characterised as a significant view or vista. The proposals fail to protect important views with heritage interest. The setting of listed buildings and structures forming the setting of Station Square (South) will be harmed.
- 3.15.12 The Application Scheme will be visible from the Market Place Conservation. The Appellant has not examined RSAF View 56 Duke Street and Market Place (because it falls outside the Appellant's selection criteria). The setting of the conservation area will be harmed by the intrusion of bulky tall buildings in views along Duke Street.
- 3.15.13 It will be demonstrated that the siting, heights, and likely massing of tall buildings within Plots C and D will harm the setting of Station Square (North and South) and surrounding buildings and structures -and townscape as a whole- because they strike the wrong balance between continuity and enclosure of views.
- 3.15.14 Evidence will support and reinforce Historic England's concern that long-range views of blocks C and D are not sufficiently explored with regards to their relationship and impact on the view of the listed station building.

- 3.15.15 It will be demonstrated that the Appeal Proposals fail to accord with HE guidance on tall buildings.
- 3.15.16 Design and townscape evidence will refer to the LPA's heritage evidence as necessary.

4 Layout, routes, and integration

4.1 Reasons for refusal

RR 4. North-South Link

The development as proposed fails to demonstrate that satisfactory direct alignment and high-quality design and form of the north-south link can be provided in accordance with policy and guidance. Therefore, the development is contrary to NPPF section 12, The National Design Guide, National Model Design Code Parts 1 and 2, Reading Borough Local Plan Policies (2019), CC7, CR2, CR3, CR11, CR11e, CR11g, TR3 and TR4 and the Reading Station Area Framework (2010).

4.2 NPPF

4.2.1 The National Design Guide (para. 80) emphasises a clear layout and hierarchy of streets and other routes helps people find their way around so that journeys are easier to make.

4.3 National Design Guidance

4.3.1 Evidence will point to strong support in the NDG for a direct alignment of the north-south route with a direct line of sight.

4.3.2 The NDG promotes a coherent development pattern with recognisable streets and other spaces with their edges defined, making it easier to find their way around and promoting accessibility (para.63). Successful development depends on a movement network that connects destinations and places and functions efficiently (para.77). A clear layout and hierarchy of streets and other routes help people find their way around (para.80). Safe and direct routes with visible destinations or clear signposting encourage people to walk and cycle (para. 83).

4.3.3 Evidence will point to strong support in the NMDC Parts 1 (including 3A Movement and 3B I para. 59) and NMDC Part 2 (including M1, A connected Network para.19).

4.4 Local Plan

4.4.1 Evidence will examine the proposals considering LP policies cited in RR 4 and demonstrate that the proposals do not accord with policy.

CC7: Design and the Public Realm

4.4.2 CC7 requires high-quality design, including a high-quality layout, urban structure, and urban grain. The policy sets out relevant design objectives, including continuity and enclosure, the quality of the public realm and provision of green infrastructure and landscaping and legibility.

4.4.3 Evidence will demonstrate that the potential misalignment of the link offers a complicated and unclear path that is difficult to comprehend and therefore less attractive. The continuity of the link will be interrupted by changes in alignment and shortened forward sightlines. Overall, the route will be unclear and illegible. Consequently, the requirements of LP CC7 are not met.

Policy CR2: Design in Central Reading

4.4.4 CR2 requires that development build on and respect the existing grid structure, contribute to ease of movement, provide well-designed public spaces and green infrastructure. Development should be designed with consideration of adjacent development sites.

4.4.5 Evidence will demonstrate that the potential form and alignment will diverge from the grid structure and inhibit movement along the link. The Appeal Scheme may not offer an appropriate alignment and form of link, which requires coordination with the development of the adjacent Allocated Site CR11g.

CR3: Public Realm in Central Reading

4.4.6 CR3 requires that new development make a positive contribution to the public realm's quality. Evidence will demonstrate the proposals will not accord with CR3iii, which requires that development adjacent to watercourses provide legible continuous public access to watercourses where this does not exist.

CR11: Station/River Major Opportunity Area

- 4.4.7 The Station/River MOA should provide a direct landscaped link between the station and the River Thames and help facilitate greater pedestrian and cycle permeability on this key movement corridor. CR11(viii) requires that development adopt a comprehensive approach to its sub-area by enabling and not inhibiting policy-complaint development of neighbouring sites such as CR11g.
- 4.4.8 The supporting text confirms successful development hinges on pedestrian and cycle permeability. The North-South Link is one of the fundamental principles for the spatial strategy of the Central Reading.
- 4.4.9 CR11 requires a high-quality route incorporating a green link through to the Thames.
- 4.4.10 CR11g (the SSE site) stresses the North-South Link is the main priority for that site and should be given substantial weight in development management. Read alongside CR11viii, the need for the Appeal scheme to facilitate and not hinder the route across CR11g should also be given substantial weight in development management.
- 4.4.11 The supporting text (5.4.10) states, 'it is **vital** that there is a clear regard for the rest of the sub-area and that planning applications are accompanied by information that addressed how the development will relate to the potential or planned development of neighbouring sites'. *(my emphasis in bold)*
- 4.4.12 Evidence will demonstrate the Appeal proposals do not guarantee and may block the creation of a direct link and fail to coordinate the policy requirement for the North-South Link across the boundary of CR11e and CR11g.
- 4.4.13 Evidence will demonstrate how the Parameter Plans or Design Code do not resolve the issue of form and alignment. In the absence of any other practical remedy or mechanism offered by the Appellant, it is vital to fix this at the Outline Stage.

TR3: Access, Traffic and Highway-related matters

- 4.4.14 TR3 requires that consideration of the effects of development on safety, congestion, and the environment. A direct (meaning straight) a North-South Link is fundamental to its role in attracting cyclists away from the main highway network.

- 4.4.15 TR3iv prohibits the regular movement of heavy good vehicles on unsuitable roads. The Appeal scheme proposes such movements in and around the northern end of the link adjacent to Station Square (North).

TR4: Cycle routes and facilities.

- 4.4.16 TR4 requires that connecting cycle routes are added or extended to make full use of opportunities to improve access for cyclists to, from and within the development.
- 4.4.17 Evidence will demonstrate how the Appeal Scheme fails to make full use of the available opportunities and may result in an inferior route that fails to fulfil the strategic purposes of the route.

4.5 Reading Station Area Framework

- 4.5.1 The RSAF recognises the importance of north-south connections from the outset of the document (para.2.18). The guiding Principles (para. 3.6) include extending public access along north-south routes.
- 4.5.2 The 'Kennet-Thames spine' is identified as a 'major city spine' and a public realm priority Paragraph 5.6 (and Figure 5.1).

4.6 Strategic nature of the North-South Link

- 4.6.1 Evidence will demonstrate the strategic importance and high priority of the North-South link in the policy. The alignment and form of the North-South Link should, therefore, be secured at the outline application stage - commensurate with its strategic important and high priority.
- 4.6.2 The future alignment and form of the North-South Link are not matters of detailed design. Therefore, the fundamental characteristics of the strategically crucial North-South Link must be sufficiently resolved at the outline application stage.
- 4.6.3 Local Plan Key principles for the Central Reading Area include: 'Access to the centre by foot, cycle and public transport will be improved (f) and: Access within the centre by foot and cycle will be improved and barriers to this improved access will be overcome, particularly in a north-south direction through the core.' (g) (LP para.5.2.2)

4.6.4 LP paragraph 5.4.6 emphasises the strategic importance of the link:

“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. (LP paragraph 5.4.6)

4.6.5 Paragraph 5.2.3 develops this further, identifying the need to overcome barriers to movement, particularly a need to emphasise a North-South Link through the centre, linking to the Thames and adjacent parks, and Caversham. Figure 5.1 shows the strategy and offers a clear, strategic north-south improved pedestrian and cycle movement north/south and east/west through the CR11e site allocation.

4.6.6 RSAF emphasises the strategic nature of the route (RSAF paras 2.18, 3.6, 5.6, 5.9, 5.17, Figures 8.5, 8.6) and the link thought the Appeal Site should be direct and legible (RSAF paras 5.9, 7.10, Figures 5.5, 8.5. 8.6).

4.6.7 The RSAF recognises the importance of north-south connections from the outset of the document, including *‘large retail and post office sheds to the north of the tracks (CR11e)* which act as one of several *‘major barriers to pedestrian movement’* blocking direct access from the Station to the riverside footpath and cycleway (para. 2.18). It is *‘the most significant movement corridor in the RCAAP’* and *‘vital to the success of development in this area’*. RSAF Figure 8.5, the Framework Structure, shows the North-South link.

4.6.8 RSAF Paragraph 5.6 (and Figure 5.1) identifies *‘the Kennet-Thames spine’* as *‘a major city spine’* (para 5.9) and one of the public realm priorities. It is *‘the most significant movement corridor in the RCAAP’* and *‘vital to the success of development in this area’*. RSAF Figure 8.5, the Framework Structure, shows the North-South link as the only *‘major path/pedestrian link’* with a direct link across the Appeal Site between two public spaces or important intersections at either end of the site.

4.6.9 The link is strategic in nature essential to the broader strategy for the area. It is the main priority for this site (LP CR11 ii, Figures 5.1, 5.2). It is, therefore, central to the success of

the Local Plan as a whole, the Reading Central Area, the Station/ Riverside Area, and the Riverside allocated site (CR11g).

4.7 Alignment and form

4.7.1 The Application Scheme and corresponding Parameter Plan offers a minimum 23m wide corridor through the site travelling between Plots C and D. The direct alignment and dimensions broadly accord with the RSAF. However, there remains a significant impediment in that the creation of a direct route with a line of sight from the Station to the River route requires coordination between the Appellant and the developer of the adjoining allocated SSE site (CR11g).

4.7.2 The development as proposed fails to demonstrate that a satisfactory direct alignment can be provided in accordance with policy and guidance.

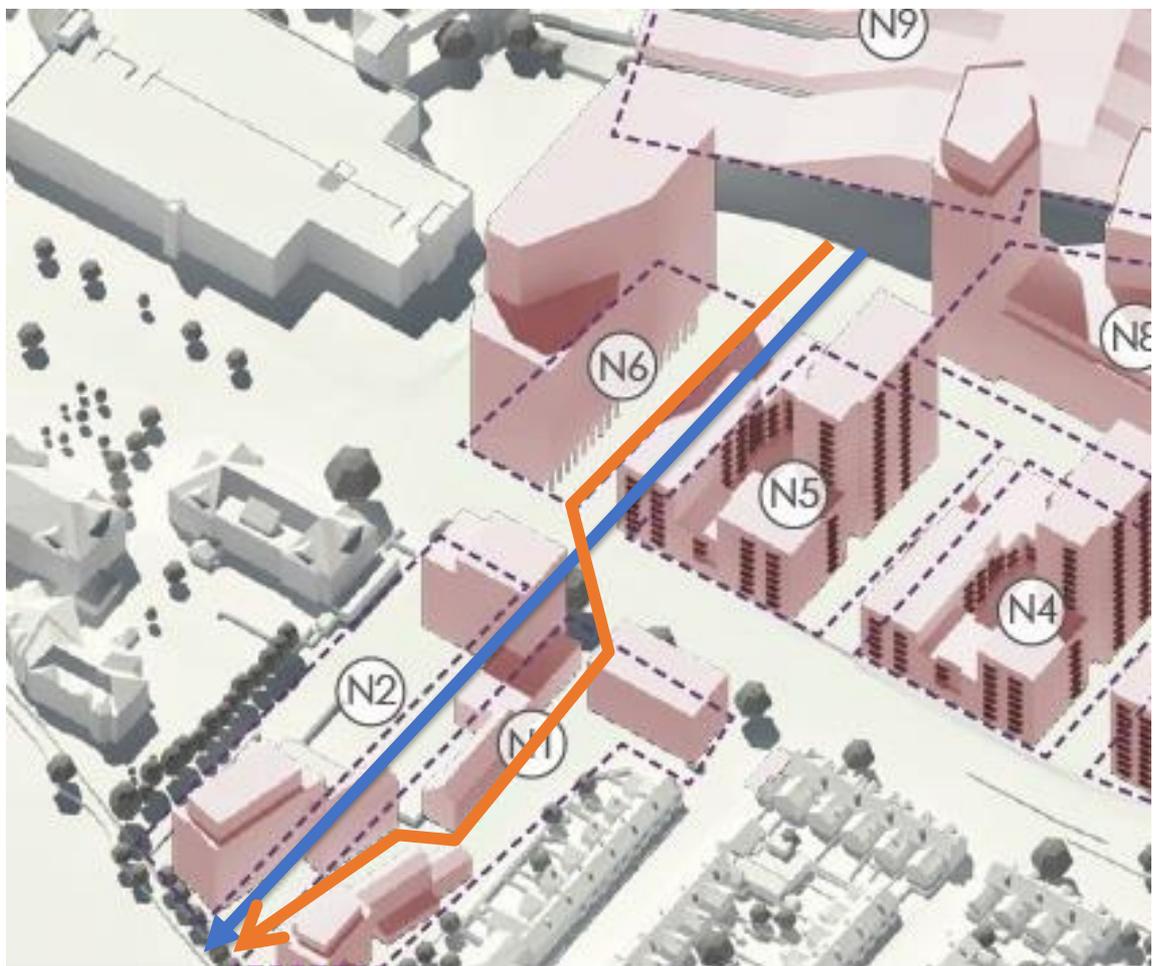


Figure 1 Diagram extracted from the Appellant's DAS showing the RSAF parcels (N1-N6) overlaid on the Appellant's block model. The blue line is the RSAF direct alignment and the red line of the Appellant's proposed alignment (DAS Page 63).

4.8 Legibility

- 4.8.1 The Appellant claims (SOC Appx.3 para 5.25) the legibility and orientation of the public realm at the northern entrance of Reading Station will positively contribute to an improved connection between the centre of Reading and the Christchurch Meadows Local Green Space.
- 4.8.2 Evidence will show how the Appeal Proposals do not support a comprehensive approach and result in a less coherent and legible public realm with direct access obstructed by a tortuous route.
- 4.8.3 The Appellant claims that a comprehensive, coherent, and legible public realm with improved access between the northern station entrance and Vastern Road will contribute positively to the townscape and visual amenity experience (SOC Appx.3 para 5.20).
- 4.8.4 The Appellant omits reference to the remainder of the NS link as it travels north from Vastern Road, further demonstrating the piecemeal approach.

4.9 55 Vastern Road

- 4.9.1 The alignment and width of the corridor between Plots C and D shown on the Parameter Plans would generally be sufficient to provide the movement corridor and (in principle) allow the quality of public realm and green link required - provided the remainder of the link to be delivered across the SSE site also accords with the Local Plan and RSAF. This requires coordination between land interests (as the RSAF requires).
- 4.9.2 Should the SSE site development fail to accord with Local Plan and RSAF guidance (as demonstrated by the current Appeal Scheme for that site), then the direct route with a direct line of sight will be severely compromised.
- 4.9.3 The strategic significance of the North-South Link is such that it must be secured at this outline application stage, taking account of several scenarios for the development of the SSE site.
- 4.9.4 The LPA refusal of the 55 Vastern Road application was appealed. The Council's position is that the appeal for 55 Vastern Road (the western part of the SSE site) should be

dismissed. Should this be upheld, the North-South Link across the SSE site as indicated in the RSAF could be expected to proceed, and the Application Scheme and Parameter Plans allow for the creation of such a route alignment. However, the evidence presented to the Inquiry is that the eastern part of the SSE site may never be redeveloped because the site is needed for electricity supply in the long term. In this case, the configuration of a direct link with a direct line of sight will require an amended scheme for the 55 Vastern Road site and a mutual adjustment of the alignment across the Application Site. This requires significant amendments to the Parameter Plans and cascading changes through the DAS, the illustrative proposals, and the design code.

4.9.5 Evidence will show that the Parameter Plans as currently drawn, particularly proposed development plots C and D for approval at this outline stage, do not account for all possible future alignments of the link across the 55 Vastern Road site.

4.9.6 The Council may need to reconsider its position if the 55 Vastern Road appeal is allowed.

4.10 Reading Grid and Permeability

4.10.1 The Appellant claims the Appeal Scheme extends the existing grid layout structure of the Reading's central area (SOC Appx.3 para 5.26).

4.10.2 Evidence will demonstrate how the extension of the Reading Grid requires the grid axes to be aligned across the Station/River MOA, including the Appeal Site and the SSE site. This must consider the several possible future forms of the SSE development. The Appeal Scheme fails to coordinate the grid layout across the MOA.

4.11 Direct line of sight and wayfinding

4.11.1 Drawing on policy and guidance, evidence will demonstrate that a direct line of sight is required between the Station Square(north) and the River along the North-South Link.

4.11.2 The Appellant claims the proposed public realm connects key townscape features and improves wayfinding for non-vehicular traffic as part of the proposed development will provide further benefits to the Appeal Site that respond positively to Policy CR3: Public Realm in Central Reading (SOC Appx.3 para 5.27).

4.11.3 Evidence will demonstrate that legibility and wayfinding will be undermined by a failure to secure a direct North-South Link and alignment of the Reading grid across the MOA.

4.12 Level of detail needed

4.12.1 The Appellant claims that, given the outline nature of the application, it isn't possible or appropriate to submit detailed plans of this pedestrian/cycle route (SOC Appx.5 para 5.3).

4.12.2 Evidence will demonstrate that it is both possible and necessary for more detailed plans of the pedestrian/cycle route to be provided at the outline stage

4.12.3 The Appellant further claims, *'it is clear that the appellant is aware of the desire for and has identified land for provision of such, and it can further be ensured as part of a Reserved Matters submission that the layout of the Building Plots do not conflict with aspirations to provide a new crossing on Vastern Road'* (SOC Appx.5 para 5.3).

4.12.4 Evidence will demonstrate that the Appellant has failed to fully identify all land needed for the provision of the link. The proposed building plots directly conflict with several possible direct alignments for the link. These fundamental matters require resolution at the outline application stage.

4.13 Parameter Plans and Design Code

4.13.1 Evidence will demonstrate how the Parameter Plans and Design code fails to consider several potential North-South Link alignments.

4.13.2 The Parameter Plan Plots are insufficiently flexible to allow for future direct alignment of the Link.

4.13.3 The Design Code takes no account of any future link alignment other than shown in the Parameter Plan plots.

4.13.4 The Parmenter Plan, for approval at outline application stage, and the Design Code, to be controlled by condition, fail to secure the North-South Link. They are a flawed basis on which to grant outline consent and offer insufficient control of the Link at the Reserve Matters Stage.

4.14 Plots C and D

4.14.1 The Appellant increased the minimum dimension between Plots C and D by 65% to 23m in response to LPA comments (the 15m within the Design Code was too narrow). In agreeing to these changes, Appellant conceded that the route *'is to be the main artery between development on this side of the station from the river and into the town centre'* and *'the route should be significantly increased to enable a strong and legible route to be created, and also in recognition that this space sits at the base of the tallest element within the scheme'* (SOC Appx.2 para 5.3).

4.14.2 Evidence will demonstrate why detailed consideration of several possible route alignments is needed at the outline stage to determine the inter-relationships between the overall legibility of the route and the heights of enclosing buildings.

4.15 Summary and conclusions

4.15.1 In summary, RR4 details how the Proposals may not provide a direct alignment and high-quality design for the North-South Link from the Station to the River.

4.15.2 The RSAF recognises the importance of north-south connections. The 'Kennet-Thames spine' is identified as a 'major city spine' and a public realm priority.

4.15.3 The link is of strategic importance and high priority. The future alignment and form of the North-South Link are not matters of detailed design. Therefore, the fundamental characteristics of the strategically crucial North-South Link must be sufficiently resolved at the outline application stage- commensurate with its strategic important and high priority

4.15.4 Evidence will demonstrate that the North-South Link is a fundamental planning principle of the spatial strategy of the Central Reading. A direct link requires coordination with the remainder of the Allocated Site CR11e and the development of the adjacent Allocated Site CR11g.

4.15.5 It will be demonstrated that the development as proposed fails to guarantee that a satisfactory direct alignment can be provided in accordance with policy and guidance. The Appellant has not fully identified all land needed to provide the link. The proposed

building plots directly conflict with several possible direct alignments for the link. These fundamental matters require resolution at the outline application stage.

- 4.15.6 Should the SSE site development fail to accord with Local Plan and RSAF guidance (as demonstrated by the current Appeal Scheme for that site), the direct route with a direct line of sight will be severely compromised. The strategic significance of the North-South Link is such that it must be secured at this outline application stage, taking account of several scenarios for the development of the SSE site.
- 4.15.7 Legibility and wayfinding will be undermined by a failure to secure a direct North-South Link and alignment of the Reading grid across the MOA. The potential misalignment of the North-South Link offers a complicated and unclear path that will be difficult to comprehend and, therefore, less attractive. The continuity of the link will be interrupted by changes in alignment and shortened forward sightlines. Overall, the route will be unclear and illegible.
- 4.15.8 The alignment is likely to diverge from the 'Reading Grid' structure and inhibit movement along the link.
- 4.15.9 The Appeal Proposals do not support a comprehensive approach and result in a less coherent and legible public realm with direct access obstructed by a tortuous route. The Parameter Plans and Design Code do not satisfactorily resolve the form and alignment across the MOA.

5 Public Realm and the interface of the development with the surrounding

(Principally RR6 Public Realm but also RR 9. Landscape, trees, and green network RR 10. Failure to provide appropriate public open spaces Reasons for refusal 7. Daylight/Sunlight (Existing and future residents)

5.1 Reason for refusal

The proposed siting of development plots, the public realm and vehicular access arrangements at the interface of the Development with Vastern Road, Caversham Road, and the remainder of the CR11e Allocated Site Station, (including integration with the North Station Square, fail to maximise and secure high quality public realm, make the most efficient use of the site, achieve effective permeability, and fail to adopt a comprehensive approach to the development of the Allocated Site. Therefore, the development is contrary to NPPF Section 12, Reading Borough Local Plan (2019) Policies, CC7, CR2, CR3 CR11 and CR11e, TR3, TR4 and the Reading Station Area Framework (2010).

5.1.1 The design and townscape evidence will draw upon other evidence as necessary (daylight/sunlight, wind, landscape, trees and the green network, open space.

5.2 NPPF

5.2.1 The NPPF states the overarching social objective of sustainable development is fostered by well-designed, beautiful, and safe places (para. 8b), whilst development that is not well designed should be refused (para. 134).

5.2.2 Evidence will demonstrate how the public realm interfaces of the Appal Proposals fail to accord with the NPPF, including:

- The design of streets does not reflect current national guidance, including the National Design Guide and the National Model Design Code (para. 110c)
- The scheme interfaces will not function well or fully contribute to the overall quality of the area (para 130 a).
- Layout and landscaping will not be visually attractive in important respects (130 b).

- In important, specific ways, the interfaces will not be sympathetic to local character and history, including the surrounding built environment and landscape setting (130c),
- The Scheme will not optimise the site's potential to accommodate and sustain an appropriate amount of public space within the mix of development (130e).
- The proposals constrain the creation of tree-lined streets (131).

5.3 National Design Guidance

5.3.1 Evidence will point to strong support in the NDG and NMDC 1 and 2 for integrating developments with one another, responsiveness to the development, an integrated movement network and the formation of high-quality public spaces (characteristics of well designed places including the context, movement and public space).

5.4 Local Plan

5.4.1 Evidence will examine the proposals considering LP policies cited in RR 5 and 6 and demonstrate that the proposals do not accord with policy.

CC7: Design and the Public Realm

5.4.2 Developments should respond positively to their local context providing value to the public realm. The Design and Access Statement for major developments should deal with the matters outlined in CC7. Development should involve the highest quality design that is sensitive to and contributes to enhancing the character of the area in which it is located (para.4.1.29).

5.4.3 The Appellant's Design and Access Statement (and Design Code) fails to address the requirements of CC7 adequately and respond positively to the site's local context and immediate public realm setting. The potential quality of the public realm at the interface with adjacent streets public spaces and development sites is unsatisfactory and unresolved when CC7 (para. 4.1.34) states a strong expectation that such design issues will be dealt with at the pre-application stage.

Policy CR2: Design in Central Reading

- 5.4.4 CR2 requires appropriate relationships between buildings and spaces, well-designed public spaces and other public realm, streetscapes, and hard and soft landscape areas (CR2a). CR2(e) requires that development and associated public realm be easily adapted over time to meet changing circumstances (such as future adjacent development).
- 5.4.5 Evidence will demonstrate the Appeal Proposals have not been designed with full consideration of adjacent sites and will prevent or cause unreasonable burdens on the future development of those sites and do not, therefore, accord with CCR2(f).

CR3: Public Realm in Central Reading

- 5.4.6 Evidence will demonstrate that the Appeal Proposals fail to make a positive contribution towards the quality of the public realm of the central area. New public open space has not been satisfactorily integrated with surrounding development (CR3i) whilst the Proposals limit or preclude street trees and other hard and soft landscaping at the interfaces of the Appeal Site where it is appropriate and should be expected (CR3ii).

CR11: Station/River Major Opportunity Area

- 5.4.7 CR11viii requires that development is part of a comprehensive approach to its sub-area, does not prevent neighbouring sites from fulfilling policy aspirations; and benefits the whole area and open space.
- 5.4.8 CR11v requires careful consideration of areas of transition to low and medium density residential such as the Caversham Road and Vastern Road Appeal Site frontages.
- 5.4.9 Para. 5.4.10 states that, ideally, development of sub-areas should be undertaken in as comprehensive a manner as possible. It is vital that there is clear regard for the rest of the sub-area and that planning applications are accompanied by information that addresses how the development will relate to the potential or planned development of neighbouring sites (para. 5.4.10).
- 5.4.10 Evidence will demonstrate that the Appeal Proposals lack details necessary to show how the development will relate to neighbouring sites' potential or planned development. A comprehensive approach to the rest of the sub-area has not been employed, including

the interfaces with the RMG site, Station Square (North) and interchange, and the Caversham Road and Vastern Road transitional spaces to low and medium density residential areas to the north and west.

TR3: Access, Traffic and Highway-related matters

- 5.4.11 The Appeal Proposals comprise new or altered access and highway works (TR3i), additions to sections of the transport network (TR3ii), regular HGV movements on new roads (TR3iv) and servicing arrangements (TR3v). The accompanying text (para.4.5.15) endorses national guidance in 'Manual for Streets'.
- 5.4.12 Evidence will demonstrate that the proposed access, traffic, and highway arrangements at the boundaries of the Appeal Site do not accord with 'Manual for Streets' guidance.

TR4: Cycle routes and facilities.

- 5.4.13 TR4 expects development to make full use of opportunities to improve access for cyclists to, from and within the development, and to integrate cycling through new facilities. Evidence will demonstrate how the Appeal Proposals fail to integrate cycling at the interface with adjacent development sites, public realm, and bounding streets.

5.5 Reading Station Area Framework

- 5.5.1 The RSAF recognises that the redevelopment of large sites (such as the Appeal Site) provides the opportunity to secure landscape public space and extend public access (Para. 3.6). Chapter 5 identifies the Northern Station Square and Vastern Road amongst ten public realm priority projects proposed to provide a network of streets and spaces providing a context within which individual developments can be brought forward. (para. 5.6).
- 5.5.2 Evidence will show how the Appeal proposal fails to reflect guidance for Station Square North (para. 5.7-8- a high-quality, multi-functional public square a new 'town square' with public space and pedestrian movement prioritised) and Vastern Road (para. 5.12 - a tree-lined avenue with planted verges).
- 5.5.3 Further guidance (para.8.12) on a high-quality public realm link to Caversham Road - the east-west spine has not been followed.

5.6 Development Site interfaces

5.6.1 Evidence will demonstrate that the siting of development plots, the public realm and vehicular access arrangements at the interface of the Development fail to maximise and secure high-quality public realm, make the most efficient use of the site, achieve effective permeability, and fail to adopt a comprehensive approach to the development

5.6.2 Four interfaces will be referred to:

- Vastern Road.
- Caversham Road.
- The remainder of the CR11e Allocated Site (RMG).
- North Station Square (north).

5.7 Vastern Road interface

5.7.1 The Appellant's case is that there will be an improved relationship between built form on the Appeal Site and the visual experience of pedestrian and vehicle users along the road and towards the station (SOC Appx.3 para 5.20). This may be so compared with the existing site. However, policy and guidance require far more than a general uplift in the quality of the public realm over the existing condition.

5.7.2 The RSAF Paragraph 5.6 lists Vastern Road as a Public Realm Priority. The aim is to create a tree-lined avenue with sufficient planting margins to enable tree-planting of scale necessary to frame views along the very-wide avenue and soften the harsh dual carriageway environment.

5.7.3 The illustrative proposals in the RSAF express this vision (Figure 14.1 and 14.8 RSAF) where the Vastern Road frontage comprises a wide pavement with large, mature trees lining the street. The wide pavement is partly achieved by realigning the Vastern Road kerb line.

5.7.4 The RSAF realignment is shown for illustration purposes in the DAS ('The Urban Edge at section7) and Design G Code (para. 6.1.4). However, crucially, the Parameter Plans show

a 5m minimum setback (PP100) and suggest that the development plots extend up to this limit.

5.7.5 Evidence will show how the Parameter Plans and the Design Code set the edges of development plots close to the existing back of pavement. As a result, the scope to form the tree-lined avenue with sufficient planting margins will be limited.

5.7.6 The Appellant claims revised, and improved setbacks will enable the creation of a positive frontage and hugely improved environment for pedestrians as compared to the existing situation. (SOC Appx.2 para 5.6.3). This is disputed.

5.7.7 Evidence on the public realm and the Vastern Road interface will refer to other evidence as necessary.

5.8 **Caversham Road interface**

5.8.1 As noted above in relation to the Vastern Road, Parameter Plan Plot A is set immediately at the back of the pavement adjacent to the Caversham Road/Vastern Road roundabout. This severely limits the ability to form a sufficiently generous planted margin to allow tree-planting to form the tree-lined avenues envisaged in the RSAF.

5.9 **East-West link, western public space, and interface with RMG site**

5.9.1 The east-west spine travels along long the southern boundary of the Application Site. The illustrative masterplan and Parameter Plans show a service road running east-west along this boundary. The proposals for the adjacent RMG site show a similar parallel road. This unusual dual road configuration separately serves the Application Site and the adjacent RMG site.

Evidence will demonstrate that this arrangement amounts to poor urban design. Two parallel roads will mean a vast area given over to vehicle circulation that will act as a barrier to pedestrians crossing from one side of the street to the other and a general dominance of vehicle movements over pedestrians.

5.9.2 The Appeal Scheme proposes no mechanism to require that whichever developer- RMG or Aviva- is first to construct the spine road agrees to permit access to the adjacent site, avoiding the need for parallel service roads.

5.9.3 The Appellants states Development Parameters require the inclusion of an open square between Plots A and B, in the western part of the Application Site. (SOC Appx.2 para 4.11.2)

5.9.4 Evidence will show how the location and form of the area of the proposed public realm in the western part of the site ('Hotel Plaza') do not conform either with Local Plan Fig 5.3 Station River major Opportunity Area Strategy (showing a diagonal street in yellow extending from Caversham Road towards the Station marked in the key 'activation of key routes and spaces with town centre uses') or the RSAF Fig 8.2- Framework Structure. The proposed public space will not mark the gateway of the meeting of the east-west spine road with Caversham Road.

5.10 **Station Square North Interface**

5.10.1 The Appeal Proposals will frame the northern edge of the Station Square (North) listed as a public realm priority (RSAF para. 5.6 and Figure 5.1). These should be high-quality public spaces- new 'town squares' (RSAF 5.8).

5.10.2 Evidence will show how the parameter Plans, DAS, and Design Code, contain little or no guidance on how the Development will integrate with and help frame, protect, and enhance the setting of the Square and the start of the North-South Route.

5.10.3 Evidence on the public realm and the Station Square (North) interface will refer to other evidence as necessary.

5.11 **Summary and conclusions**

5.11.1 In summary, RR6 details the failure of the proposals to provide a high-quality public realm where the Appeal Site boundaries meet the surrounding area - the '*interfaces*'.

5.11.2 These concerns relate to the four interfaces of the scheme:

- Vastern Road.
- Caversham Road.
- The remainder of the CR11e Allocated Site (RMG).
- North Station Square (north).

- 5.11.3 RR6 details specific design quality concerns with the siting of development plots, the public realm, vehicular access arrangements. The Proposals fail to maximise and secure a high-quality public realm, make the most efficient use of the site, achieve effective permeability. They fail to adopt a comprehensive approach to development.
- 5.11.4 The characteristics of well-designed places are set out in the NDG and NMDC 1 and 2 and reflected in LP and RSAF policies. Developments should integrate with and respond to their setting, provide an integrated movement network, and high-quality public spaces.
- 5.11.5 It will be demonstrated that the public realm interfaces of the Appeal Proposals fail to accord with policy and guidance including the NPPF and National Design Guidance.
- 5.11.6 The Appeal Scheme inadequately and responds to the site's local context and immediate public realm setting. The potential quality of the public realm at the interface with adjacent streets, public spaces and development sites is unsatisfactory and unresolved. The Proposals have not been designed with full consideration of neighbouring places and will prevent or cause unreasonable burdens on the future development of those sites. New public open space has not been satisfactorily integrated with surrounding development.
- 5.11.7 The Appeal Proposals lack sufficient detail about the future relationship with neighbouring sites' potential or planned development. A comprehensive approach to the rest of the sub-area has not been employed, including transitional spaces to low and medium density residential areas to the north and west.
- 5.11.8 The RSAF recognises that the redevelopment of large sites (such as the Appeal Site) provides the opportunity to secure landscape public space and extend public access. The Appeal proposal fails to reflect guidance for Station Square North (para. 5.7-8- a high-quality, multi-functional public square, a new 'town square' with public space and pedestrian movement prioritised) and Vastern Road (para. 5.12 - a tree-lined avenue with planted verges). Further guidance (para.8.12) on a high-quality public realm link to Caversham Road - the east-west spine has not been followed.

- 5.11.9 The RSAF lists Vastern Road as a Public Realm Priority. The aim is to create a tree-lined avenue with sufficient planting margins to enable tree-planting of scale necessary to frame views along the very-wide avenue and soften the harsh dual carriageway environment. The Appellant's Parameter Plans show a 5m minimum setback (PP100) and suggest that the development plots extend up to this limit. This sets the edges of development plots too close to the existing back of pavement, leaving insufficient planting margins.
- 5.11.10 Parameter Plan Plot A is set immediately at the back of the pavement adjacent to the Caversham Road/Vastern Road roundabout. This severely limits the ability to form a sufficiently generous planted margin to allow tree-planting to create the tree-lined avenues envisaged in the RSAF.
- 5.11.11 The East-West link, western public space, and interface with the RMG site show an unusual dual road configuration that serves the Application Site and the adjacent RMG site separately. This arrangement amounts to poor urban design. Two parallel roads will mean a vast area given over to vehicle circulation that will act as a barrier to pedestrians crossing from one side of the street to the other and a general dominance of vehicle movements over pedestrians.
- 5.11.12 The Appellants states Development Parameters require the inclusion of an open square between Plots A and B, in the western part of the Application Site referred to as ('Hotel Plaza'). The location and form do not conform either with Local Plan Fig 5.3 Station River Major Opportunity Area Strategy or the RSAF Fig 8.2- Framework Structure. The proposed public space will not mark the gateway of the meeting of the east-west spine road with Caversham Road.
- 5.11.13 The Appeal Proposals will frame the northern edge of the Station Square (North), which is listed as a public realm priority in the RSAF. This should be high-quality public spaces- new 'town squares' (RSAF 5.8). It will be demonstrated that the proposed arrangement of buildings and vehicle circulation will harm the square's setting. The Parameter Plans, DAS, and Design Code contain little or no guidance on how the Development will

integrate with or help frame, protect, and enhance the setting of the Square and the start of the North-South Route.