Vastern Park, Reading

Rebuttal Proof

Design and Townscape

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

April 2022

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1 Introduction, Scope, and Summary

1.1 Scope

1.1.1 This Rebuttal Proof addresses the following evidence.

- Proof of Evidence of Mr Matthew D Chard BA(Hons) Dip (Hons) MAUD CMLI Ref. 17127/A5 (March 2022).
- Proof of Evidence of the Appellant in relation to Design Matters, Mr Roy Collado RIBA MBA ARB MRIA (March 2022).

1.2 Structure of the Proof

1.2.1 I will rebut Mr Chard's Townscape evidence ('Mr Chard')' followed by Mr Collado's Design Evidence ('Mr Collado'). There is one exception- for clarity, I have rebutted Mr Chard's and Mr Collado's evidence on the north-south link in one section.

1.2.2 I address Mr Chards' evidence on the TVIA and policy and guidance and then arrange my rebuttal under the heading from my main proof and based on the LPA Reason for Refusal (RR) as follows:

- Scale, height and massing - linking to RR1 (Height, scale and massing) and RR2 (Tall Buildings).
- Views -linking back to RR3 (Views and townscape) and RR5 (heritage).
- North-south link -linking back to RfR 4 (north-south link).
- Public Realm - linking back to RfR 6 (public realm).

1.2.3 I rebut Mr Collado's evidence chapter by chapter.

2 Townscape (Mr Chard)

2.1 TVIA methodology

Lack of a TVIA

2.1.1 Mr Chard claims the LPA has not prepared a TVIA (7.19 page 32). This has been fully referenced in my main PoE (para. 3.3.7 CD10.3). In any case, my judgements are informed by the application materials, including the wireframe views.

2.1.2 The Appellant's TVIA relies heavily on the townscape and visual assessment in the LPA's RTBS, which informed the development of the RSAF and the Local Plan. The LPA also commissioned the earlier City Centre Framework and the associated townscape and view analyses.

2.1.3 The TVIA can and should be an area of common ground based on methodical and objective analysis. The Appellant's TVIA falls short in certain respects, as I have outlined in my Main Proof (3.3.7)

2.1.4 Mr Chard claims my observations on inappropriate scale and height and mass and unacceptable detrimental effects on townscape are unsubstantiated (7.19 page 32). These have been substantiated in my Main Proof (2.3).

2.2 Policy and guidance

Status of RSAF (Chard PoE para.8.3 page 52)

2.2.1 Mr Chard diminishes the status and relevance of the RSAF (para.8.3 page 52) and refers to 'questionable observations and assumptions' (7.100).

2.2.2 The RSAF is twelve years old, as Mr Chard notes. However, it remains the adopted SPD for the Appeal Site and is repeatedly referenced in the up-to-date Local Plan.

2.2.3 In relation to the tall building policy (CR10), the RSAF comprises the *'planning framework'* (LP 5.3.39 page 143), within which tall buildings should be considered. It provides *'further guidance on the relative heights, massing and spacing of buildings, and the function and*

quality of public realm around them, along with their relationship with the major transport interchange improvements delivered at Reading Station.' (LP 5.3.39 page 143).

2.2.4 In relation to the Station River MOA (CR11), the LP confirms the document continues to apply and *'provides more detailed guidance'* (LP 5.4.9 page 150).

2.2.5 Mr Chard argues that *'a number of key design principles and aspirations have been carried forward into the local plan'*. This is not correct. All of the design and townscape guidance in the RSAF continues to be relevant policy.

2.2.6 The RSAF carries weight in decision-making because it has been produced as part of the plan and a supplementary planning document (NPPF para. 129). Development that is not well designed and fails to reflect local design policies taking into account any local design guidance and supplementary planning documents such as design guides and codes, should be refused (NPPF para. 134).

The relevance of the RSAF in the context of changes in Central Reading (Chard PoE 8.3 page 52)

2.2.7 Mr Chard claims *'the context of the centre of Reading has evolved since its (the RSAF's) adoption'.* That is true. What has changed is that the station area has been redeveloped-initiated, facilitated, and guided by the RSAF.

2.2.8 RSAF Figure 6.8 (page 37) shows the main proposed development plots in 2010. This is the story today:

- S3: New Rail Station (opened 2014).
- B9: New northern station entrance (opened 2014).
- N11: BMW site or Thames Quarter (development complete).
- S1, S2, S11, S10: Station Hill Planning (consented c.2020, development commenced).
- N7 and N8: 80 Caversham planning (consent 2022).
- N1 and N2: 55 Vastern Road (planning consent 2022).
- S4: Thames tower redevelopment complete
- S12: Consent granted.

- S5: Concourse part of station redevelopment.
- S6, S7, S8, S9:

2.2.9 The Public realm within the station area and the ten public realm priorities are shown in Fig 5.1 (page 24) and listed in RSAF para. 5.6 page 25 has been largely developed:

Station square South (1)

- Station Square South (c.2014).
- Three Bus and taxi Interchanges (c.2015).

Station Square North (2)

- Pedestrianised Station Square North (c.2015).

Kennet Thames Spine (3)

- New subway beneath the railway (c.2016).
- Christchurch foot and cycle bridge (2015).
- Station Square South (c.2014).
- Station Square North (c.2015).
- Christchurch foot and cycle bridge (2015).

Riverside Path and Water Spines (4)

Vastern Road (5)

- Central reservation paved and trees planted (interim scheme) (c.2015)

Friar Street Link and Central Piazza (6)

- Station Hill Planning (consented c.2020, development commenced).

Station Road Enhancement (7)

- Station Road footway widening and carriageway narrowing (c.2014).

Riverside Open Space (8)

Pedestrian Grid

- Christchurch foot and cycle bridge (2015).

Landscaping and public art

2.2.10 Mr Chard infers the RSAF is obsolete when the exact opposite is true- it is almost complete. The Vastern Park Site is one of the few final pieces of the framework - not a fresh start in changed circumstances, as Mr Chard suggests.

Status of the RTBS 2018 (Chard PoE para.7.108 page 50)

2.2.11 Mr Chard refers to the 'reduced status of the RTBS as a guidance document since adoption of the Local Plan' (para.7.108 page 50). He wishes us only to consider the document as an 'assessment of townscape character' and when considering 'sensitivity to tall buildings'.

2.2.12 I see no justification for this slicing up of the document.

2.2.13 The RTBS findings were developed into the RCAAP tall buildings policy (RTBS 2008 para 7.1 page 58). The Local Plan (para.5.3.36 page 141) confirms it is *'essential that there is a strong and clear policy on tall buildings, based on an analysis of the effects of, and opportunities for, such buildings'*. The RTBS should therefore be read alongside CR10 to positively identify opportunities for tall buildings through the RTBS design guidelines in section 6 (page 40), including the preferred tall building locations (para 6.1), the general principles (para. 6.3) and site-specific principles (para.6.4).

2.2.14 The only difference between RTBS and CR10 is that the local plan proposals map *'areas of potential for tall buildings'* excludes the area west of Caversham Road Figure 5.1, page 39 of RTBS. I do not see any other part of the RTBS guidance which conflicts with CR10 - or recent development schemes that made the guidance inoperable.

2.2.15 I can point to several examples of where RTBS guidance supports of CR10. RTBS principles 6.2 page 40 explains the approach to cluster typologies. The street environment principles at page 42 build upon CR10(v) second bullet. Site specific principles for the station area cluster on page 46 provide further details on massing, building on CR10v fifth bullet - avoid bulky or over-dominant massing.

Interpretation of RTBS CA22 sensitivity and suitability assessment and the use of the terms tall, taller tallest

2.2.16 Mr Chard (para. 7.112 page 50) claims I misrepresent the RTBS 2018 text in my SoC para.2.7.3.

2.2.17 I quote the entire text in of CA22 in the paragraph immediately above (MD SoC 2.7.2), so that can be no basis for Mr Chard to claim that this has been misrepresented. I have, though, provided my interpretation at para. 2.7.3.

2.2.18 I provide a summary of the CA22 principles at 2.2.5.18 of my PoE where I state (second bullet) 'The tallest structures should be located to the south of the character area, adjacent to the railway line'.

2.2.19 The reference to 'tallest structures' in the RTBS quote is clearly in counterpoint to the first part of the quote 'tall structures should not be developed along the north and western boundaries of the character area'.

2.2.20 Mr Collado appears to agree with my interpretation: 'Tall buildings are not recommended to the east or north of this area (CA22), but to the south and in proximity to the railway they are acceptable' (Collado PoE para. 4.7.1 page 24).

2.2.21 The quote is: 'The tallest structures should be located to the south of the character area, adjacent to the railway line'. The alternating use of the terms 'tallest structures', 'tall structures' and 'tall buildings' is not the same. 'Tall buildings' are clearly defined in the RTBS (and CR10) by reference to height and storey thresholds: 'Tall structures' and 'tallest structures' are not defined and, in my view, are used as relative terms as in 'tall' adjacent to the railway and 'short' at the northern boundary.

2.2.22 I completely disagree with his claim that I have misrepresented the RTBS.

2.2.23 This should not cloud the fact my SoC pointed to the fact Mr Chard omitted part -and therefore misrepresented -the CA22 guidance of 2018, which states: '*Townscape*

sensitivity remains low, ***albeit with the caveats expressed in 2008 continuing to apply',*** which included that the tallest structures should be located adjacent to the railway.

2.2.24 Appeal Proposal Plots A and B lie on the northern boundary of CA22. They directly face the boundary of the small-scale residential areas within CA12. They are not adjacent to the railway line. The RTBS is clear these are unsuitable locations for tall buildings. In this context, the Appellant and I understand *'tall buildings'* to mean *'tall structures'*, as Mr Collado makes clear at his 4.7.1.

Railway adjacent Site location and setting (Chard PoE para. 8.1 page 52)

2.2.25 Mr Chard (para. 8.1 page 52) is incorrect in his description of the Appeal Site setting and any reasonable definition of '*adjacent to the railway line'*.

2.2.26 A common definition of adjacent is something that is next to or adjoining something else.

2.2.27 The south west corner of the Appeal site is adjacent to the Station Square North, not the station or railway line. The remainder of the Appeal Site is separated from the railway by the 80 Caversham Road site with the distance between the railway and the Appeal Site increasing to the west.

Outline application/structure of the application

2.2.28 According to Mr Chard (8.15 page 55), 'the Appeal Scheme does not consider specific and definite details of the scheme as permission for these is not what is being applied for and neither policy not guidance requires detailed schemes to be put forward at the outline stage'.

2.2.29 It is correct for Mr Chard to highlight that the Appeal scheme lacks specific and definite details; the sufficiency and specificity of details is a central issue in this appeal. However, the Appellant is putting forward specific and definite plot dimensions and maximum building heights for approval at the outline stage, which must be fully justified. The Appellant is seeking approval for a particular quantum of development. This is raised in the LPA Committee Report at 8.1.

"The Application is for Outline Planning Permission with all matters reserved, including the development's layout, scale and appearance. At this outline stage, a judgment must

be reached as to whether the proposed quantum and composition of development can be accommodated on the site whilst achieving the standards for design expected by National and Local policy and guidance - including the RSAF"

2.2.30 The Local Plan confirms (CR10 para. 5.3.51 page 144) 'outline applications for tall buildings are appropriate **only** in cases where the applicant is seeking to establish the principle of (a) tall buildings (s) as an important element within the context of a robust and credible masterplan for the area to be developed over a long period of time. In such cases principles must be established within the design and access statement accompanying the application, which demonstrates that excellent urban design and architecture will result'.

2.2.31 The parameter plans do not amount to *a robust and credible masterplan. The* LPA cannot rely on the illustrative scheme at the reserve matter stage -it is neither robust nor credible. The scope and detail in the Design Code is severely limited.

2.2.32 NMDC1 (page 24) states tall buildings **require** guidance on their design. NMDC 2 (para. 49, page 48) says tall buildings need to be designed to the highest architectural quality. It is unclear how Mr Chard can properly judge excellent urban design and architecture without a detailed scheme. Historic England tall building guidance (5.12 page 14) states when submitting a planning application for a tall building that may impact the historic environment, *'proportionate supporting information is required'*.

2.3 Scale, height, and massing

2.3.1 At 7.20 to 7.22, Mr Chard claims my statement at 1.20.1 is illogical:

" because 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."

2.3.2 Mr Chard states effects on townscape have to be considered not in terms of whether or not they accord with documented prescriptions; but through detailing the nature of change and the sensitivity of receptors to come to a significance of effect. This is the GLVIA method, but I am assessing the Appeal scheme on its accordance with policy and guidance using the LPA's RTBS townscape and visual assessment (on which Mr Chard own LVIA is

founded), the verified wirelines produced by a company independent from Mr Chard's and my own three-dimensional analysis illustrated by the various digital models and analysis diagrams included in my Proof.

2.3.3 At 7.26, Mr Chard claims I make the unsubstantiated claim in SoC para. 2.10.12 that the Appeal Scheme will appear as a 'single slab' of towers. I have explained why the gaps between the individual blocks, broadly aligned north south, will not offer the differentiation Mr Chard claims, particularly where the viewpoint is not aligned with the north-south streets.

Massing vs height

2.3.4 Mr Chard (7.33 page 35) confuses discussion in the LPA Committee Report on building width, mass, and height. Height and mass are not the same. This can be simply illustrated to address confusion.

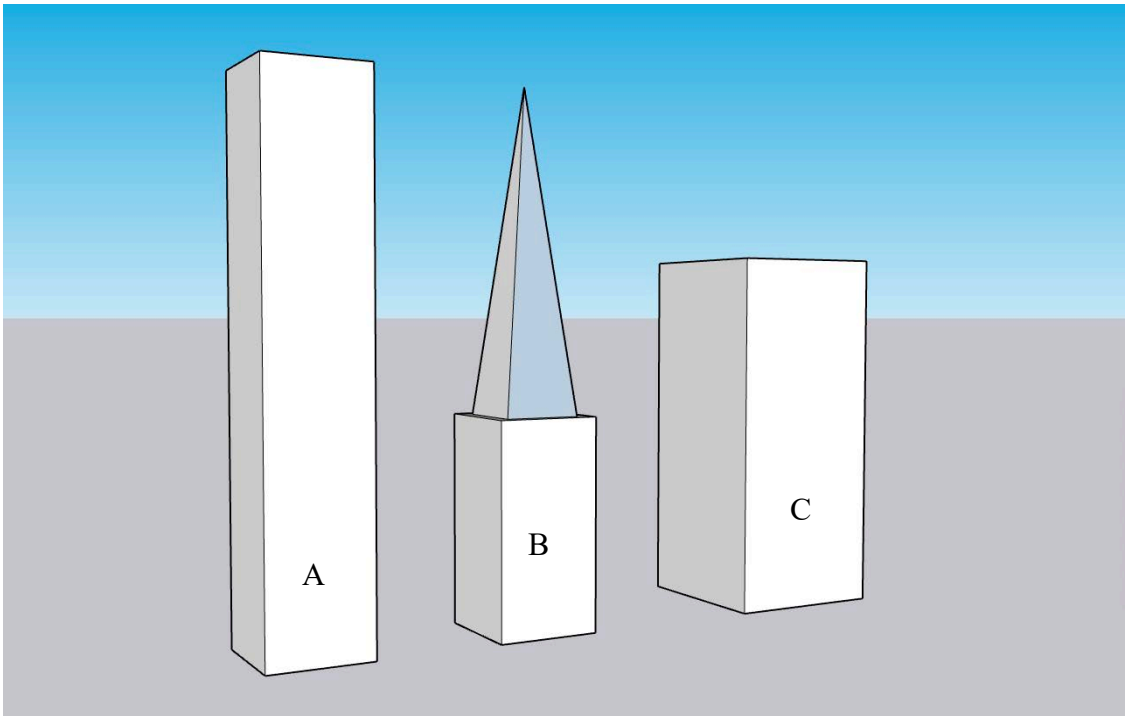


Figure 1.Differentiating height and mass

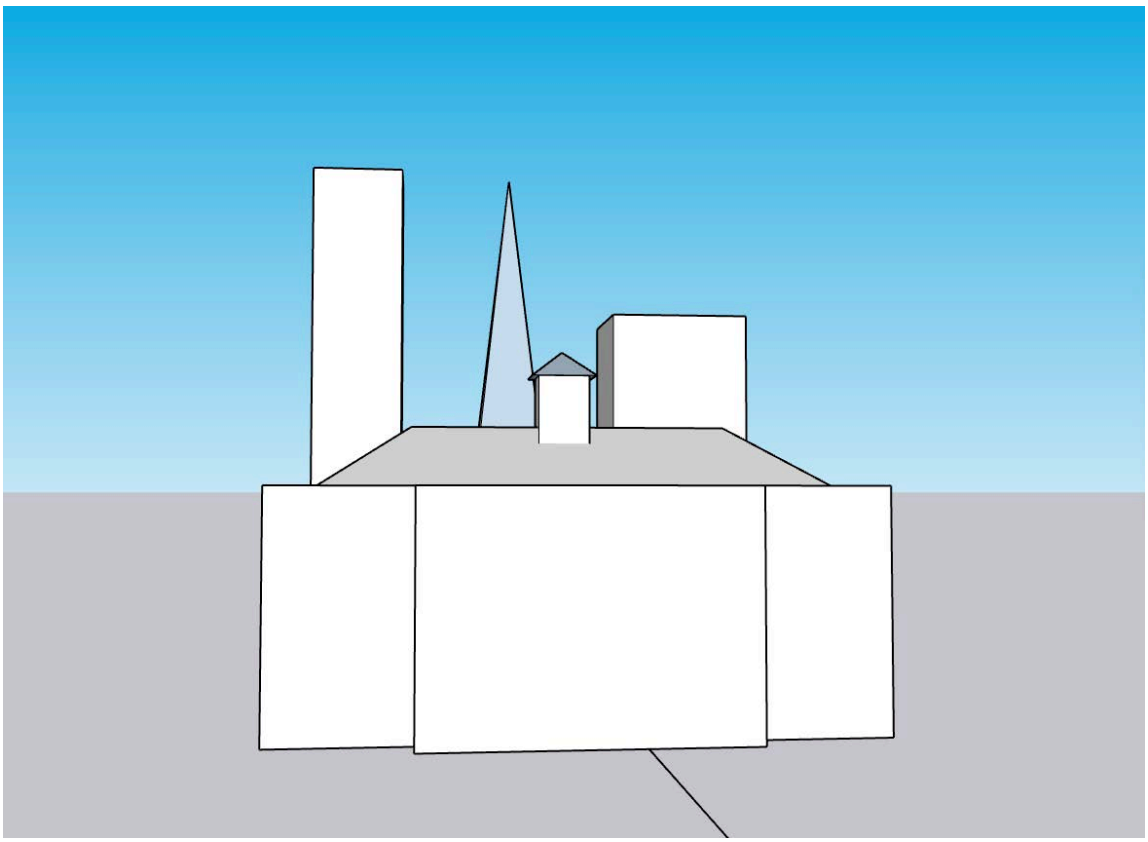


Figure 2.Sketch illustrating the varying effects on height and mass on views.

2.3.5 Volume A is the same height as volume B (the steeple). Volume C is much lower than either A or B but has a greater mass or volume. In the figure below, the lower building with the larger mass has a more significant effect on the view than the other two volumes.

2.3.6 The committee report at 8.69 does not contradict itself (Chard 7.33). Width, height and mass are considered together to conclude that the mass of Block D will be too great.

2.3.7 The RSAF illustrative scheme shows tall but slender buildings that will infringe upon views to a far lesser extent than the Appeal Scheme as indicated in the Parameter Plans.

Optimum scheme

2.3.8 The Appellant's case is that the Appeal Scheme is the *'optimum scheme'* because it results from a collaborative design process and the evidence base supports and reinforces the point (7.100 page 48).

2.3.9 Having arrived at their optimum scheme, it is unclear why the Appellant's parameter plan heights do not reflect that scheme and the 'prescribed controls set out with the Design

Code' (7.39 page 36) safeguard the parameter plans, not the optimum scheme so carefully developed.

Indicative Massing (Chard PoE para. 8.4, page 52)

2.3.10 Mr Chard suggests the Appeal Scheme offers only *'indicative massing'* (para 8.4 page 52). That is not the case. He rebuts the assertions in section 1.5 of my SoC and claims the outline application only seeks to establish key principles, He considers my suggestion that insufficient assurance of details of the scheme has been given to date is spurious.

2.3.11 Parameter Plan PP103 Plot Heights indicates details of massing for approval at the outline stage. This may be crude: It may not be a detailed massing strategy: It may only be framed in terms of maximum sub plot heights and minimum and maximum offsets, but it is a massing strategy. Its crudeness and its specificity indicating apparent breaches of policy and guidance are central issues in this appeal.

2.3.12 Mr Chard states (para.8.4, page 52) states there may be some 'refinement of massing details within the parameters' to be controlled through 'input to detailed applications' to 'address any concerns surrounding the bulk of the Appeal Scheme'.

2.3.13 Fundamental concerns with *'the bulk of the Appeal Scheme'* should be addressed at the outline stage through a version of Parameter Plan PP103 that ensures the scheme's scale, mass, and height is acceptable.

Landmark definition

2.3.14 There is some confusion across Mr Chard's and Mr Collado's evidence on what a landmark means and whether guidance on landmarks supports the Appeal Scheme.

2.3.15 RSAF Figure 6.8 and Table 6.9 (page 37) propose three 'local landmarks' within Plots N4, N5 and N6 (Appeal Plots C, D and E). Landmark buildings typically exceed plot benchmark heights with 'Local Landmarks' defined in RSAF Figure 6.4 as ten or more commercial storeys. Buildings above ten commercial storeys must also meet all the requirements set out in CR10.

2.3.16 It does not follow that landmark buildings on Plots C, D, and E should automatically rise to a height where they might form part of the 'crown' of the station tall building cluster

or become prominent in views - such as that from Station Road. The guidance is that they may be permitted to rise above benchmark heights to 10 commercial storeys or above in some circumstances, provided all the requirements of Policy CR 10 are met.

2.3.17 RSAF Figure 6.5, massing strategy, shows the crown and gives an example of how a local landmark building may be permitted to exceed the benchmark heights and *'exceptionally breach the blister massing control principle'* (Fig 6.4).

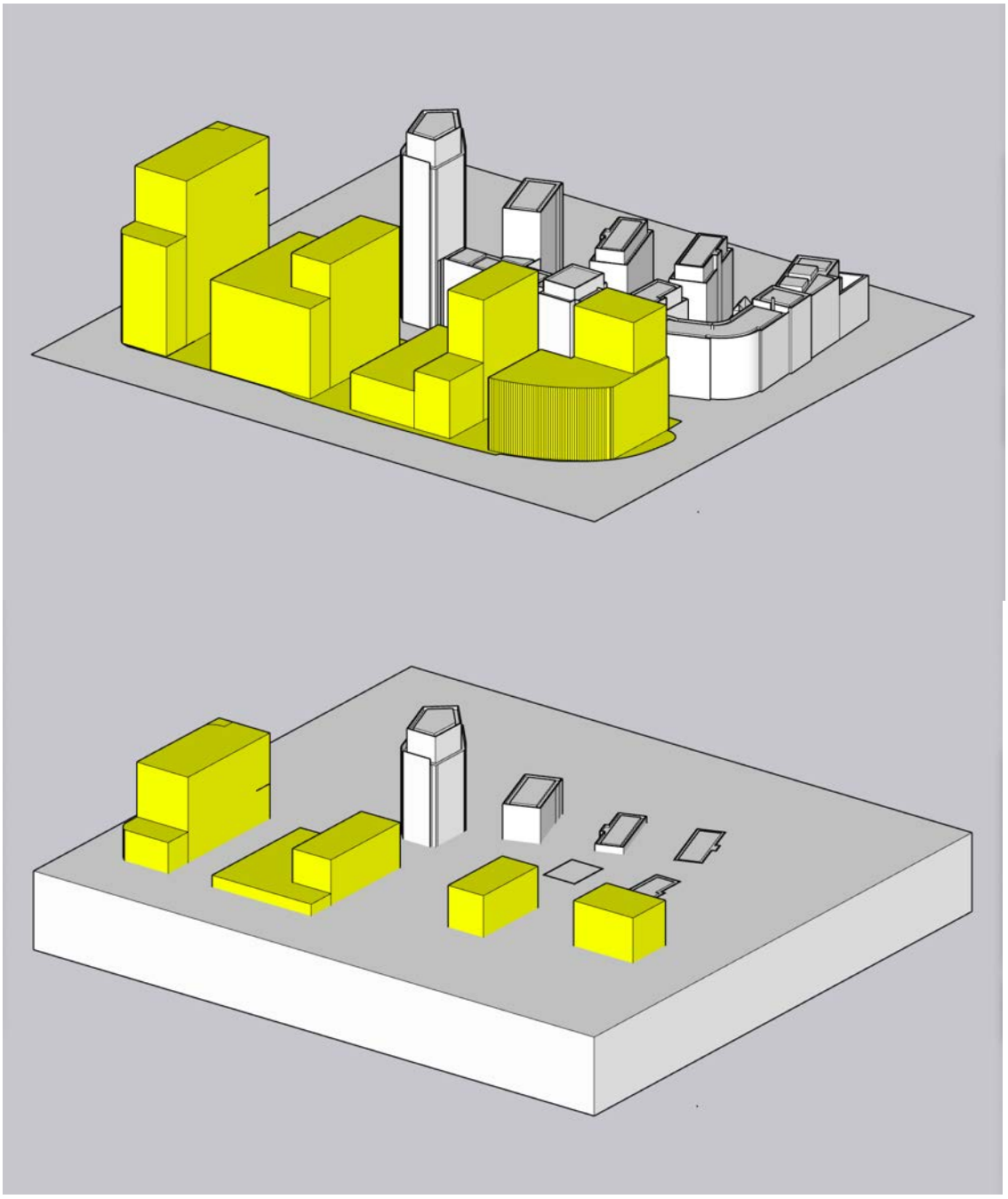


Figure 3.The parameter plan heights (above) with the 36 meters tall buildings added (below)

2.3.18 The figure below illustrates the Appeal Scheme parameter plan heights with the 36-meter-tall building threshold added in the second image. This shows tall buildings across the entire footprints of plots C and D rather than individual landmark buildings shown in the RSAF illustrative framework. There is also a tall building on plot A where Mr Chard acknowledges the RSAF proposes none.

Where are the nexus and crown?

2.3.19 Height and massing policy and guidance refer to a *'nexus'* and *'crown'*. The nexus is the rail station, whilst the crown is *'the area of greatest permissible height, immediately adjoining and to the south of the station entrance'* (RSAF 6.14 page 34 (the Station Hill Site and the District Landmarks proposed at RSAF Fig. 6.8 and 6.9 plots S2 and S11).

2.3.20 Mr Chard suggests the aspiration is *'to define a crown of development to the north of the station' (*7.14 page 31). That is not correct.

2.3.21 At 7.41, page 37 he mistakenly claims the RSAF 'identifies tall building clusters' (plural) with local landmark buildings north of the station. That is not correct.

Height and massing strategy

2.3.22 Mr Chard claims (7.34 page 35) my statement that the Appeal Scheme '*scatters tall buildings across the site' (*2.10.3) is unsubstantiated. The following diagrams show how tall buildings occupy every development plot, hence my statement that they are scattered across the Appeal Site.

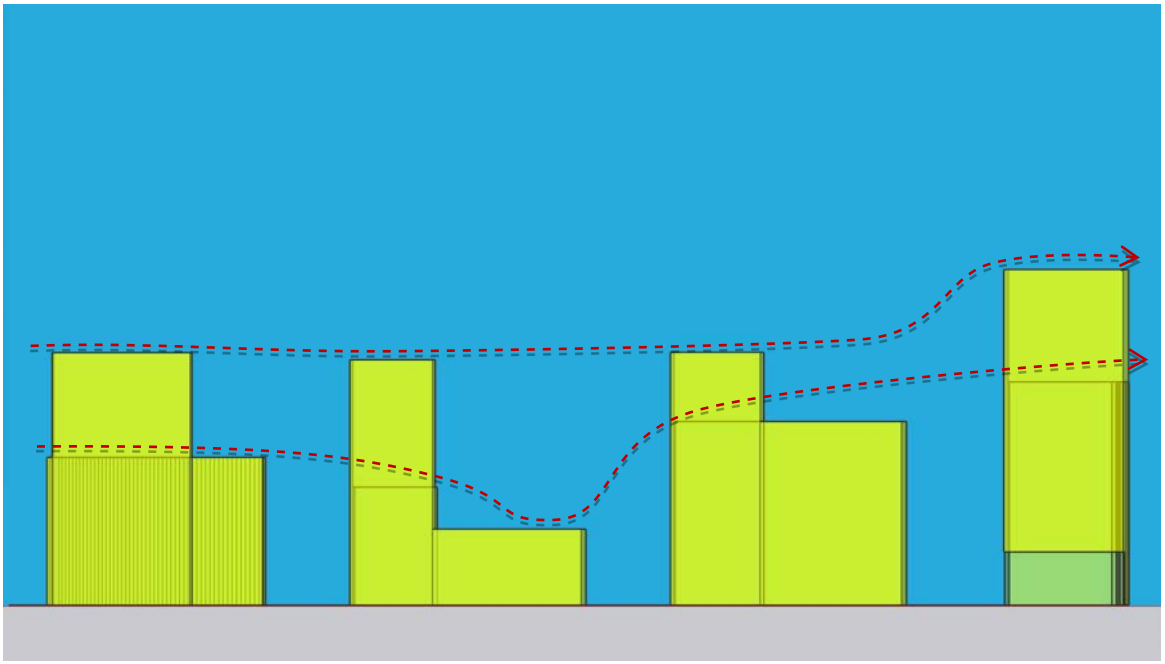


Figure 4.Orthogonal view from the railway looking north towards the Appeal scheme beyond (yellow). Appeal Scheme Block A is on the left, with Block D on the right.

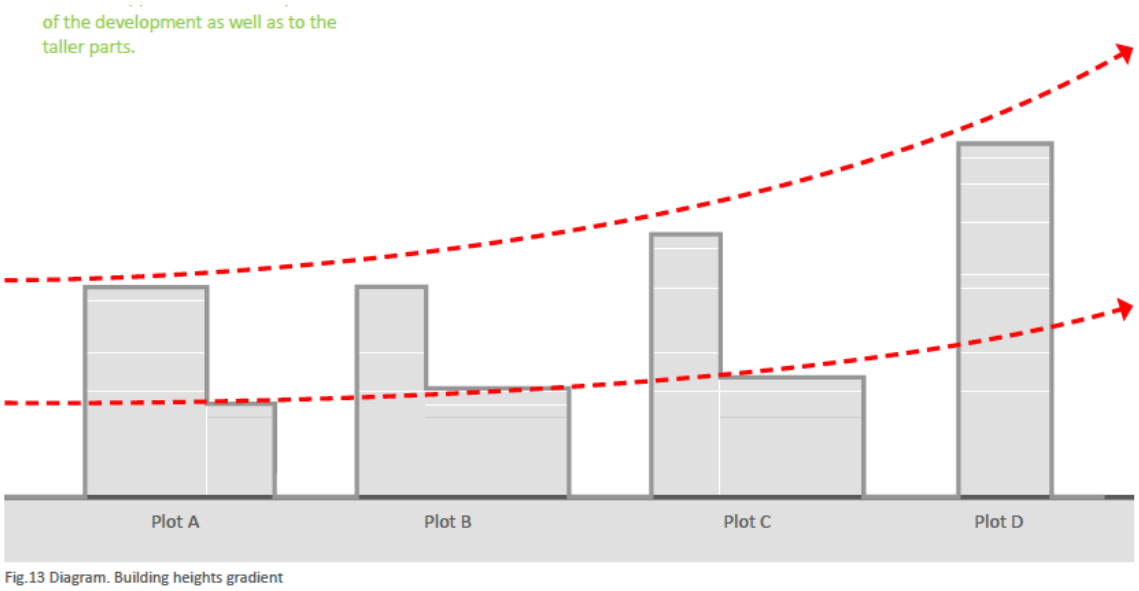


Figure 5.Design Code Massing diagram (page 26).

Figure 6.Tall and landmark building guidance at Design Code 5.4 page 53 showing a single land mark

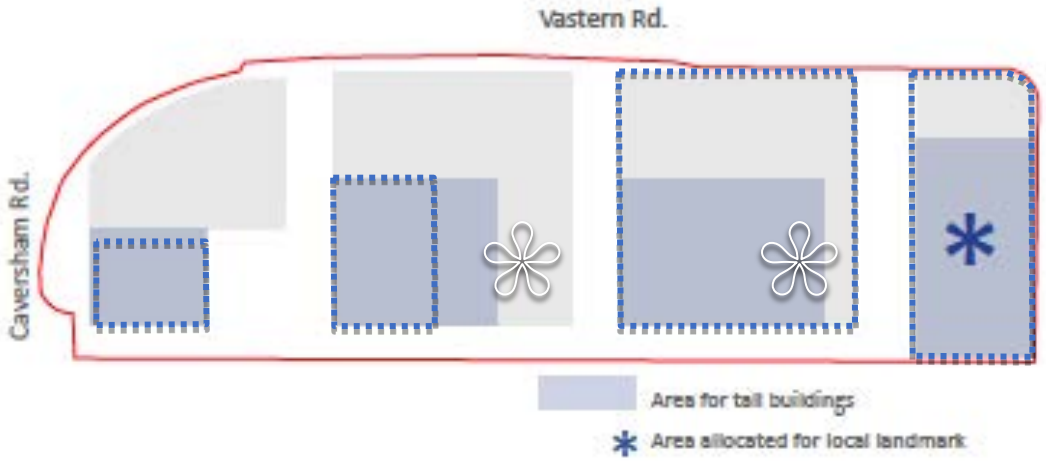


Figure 7.Tall and landmark building guidance at Design Code 5.4 page 53 showing the actual extent of tall buildings proposed in the Parameter Plans (blue dotted line) and the positions of further local landmarks (white star) as per RSAF Figure 6.8 and 6.9.

80 Caversham Road relative heights

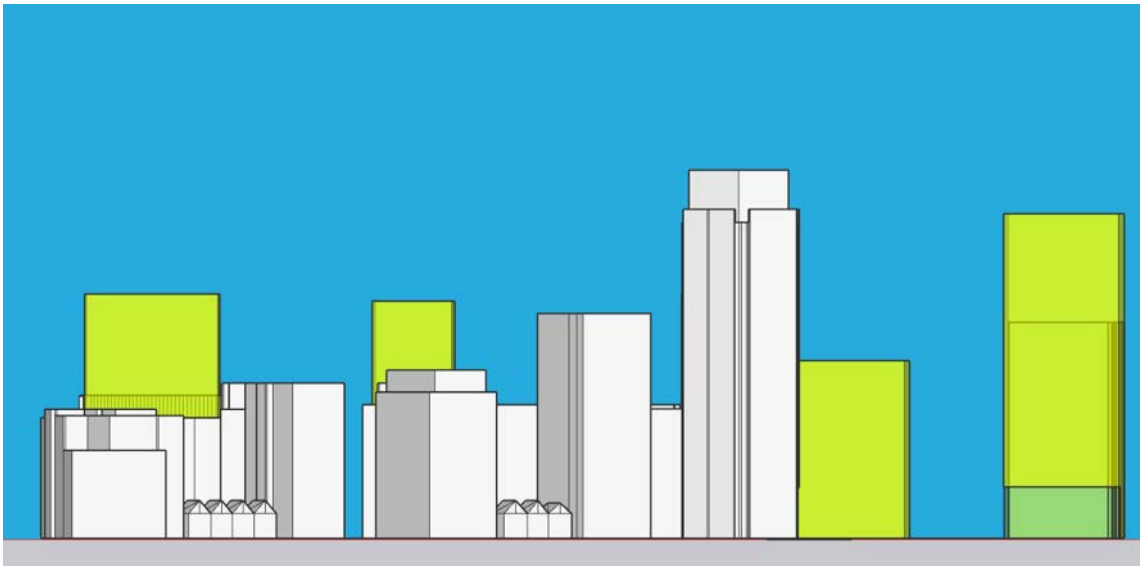


Figure 8.Orthogonal view from the railway looking north towards the approved 80 Caversham Road Scheme (white) with the Appeal scheme beyond (yellow). Appeal Scheme Block A is on the left, with Block D on the right.

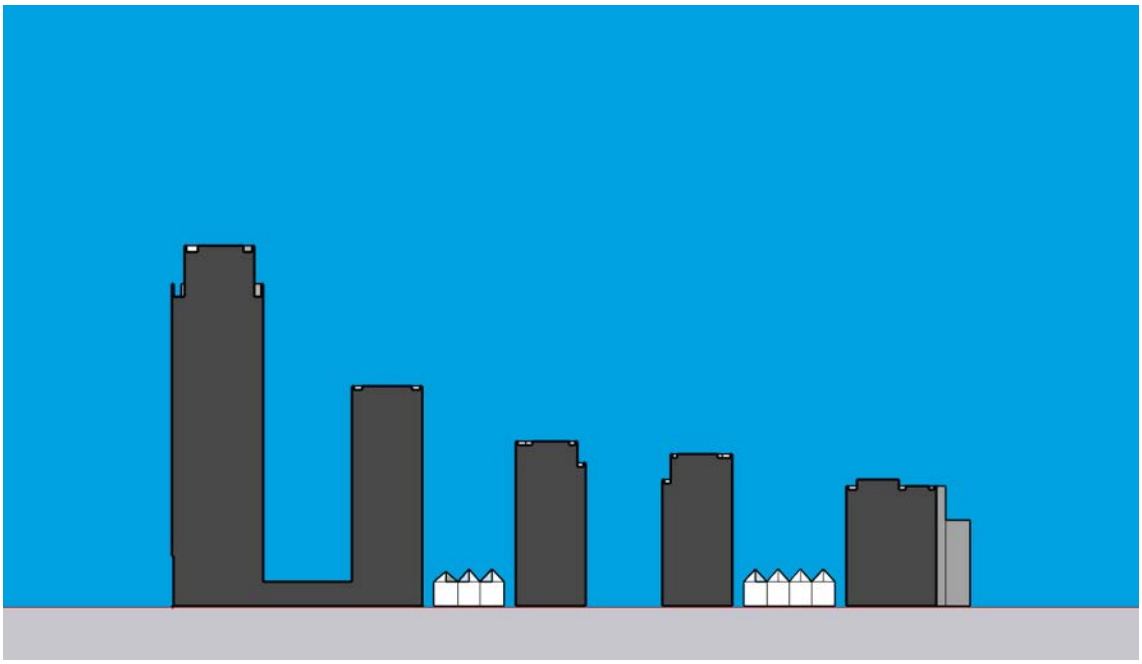


Figure 9.Cross-section through 80 Caversham Road Scheme adjacent to the railway with Caversham Road on the right.

2.3.23 AVR 07 (Chard Illustrative Material Document B CDXX) now clearly shows that the appeal scheme will appear more prominent than the 80 Caversham Scheme when policy and guidance require (and the Appellant claims) the tallest buildings will be adjacent to the

railway and descend in heights away from the northern station entrance and away from the railway line.

Figure 10.AVR 07 adjusted to show the 80 Caversham Scheme (Mr Chards Illustrative Materials Document B). Appeal Block A on the left side (yellow) is clearly taller than the 80 Vastern scheme on the right (red line) when policy requires the tallest buildings adjacent to the railway and closest to the station.

Design code massing guidance

2.3.24 Mr Chard (8.8 Summary and Conclusions) suggests the Design Code will ensure variety in massing and heights, reflecting the aspirations of increased development height and density anticipated in the RSAF and Local Plan.

2.3.25 The parameter plans and illustrative scheme do not accord with the RSAF and Local Plan for the reasons I have set out in my proof. The illustrative scheme diverges widely from the parameter plan heights such that one cannot justify or explain the other. I see little or no evidence the Design Code offers further substantive controls over massing and heights. Therefore, the conflict between the Appellant's approach and the LPA's fundamental concerns with scale and massing cannot reasonably be expected to be resolved to the satisfaction of both parties at the reserve matters stage. The LPA's discretion to exercise

its own judgment on scale and height will be curtailed -because the parameter plan heights have already been fixed.

2.3.26 The Parameter Plan heights and massing, in excess of the illustrative scheme, will inevitably act as an incentive and maximum target for any future developer.

Massing design hierarchy including varied materiality on the horizontal and vertical axis (8.9)

2.3.27 The conclusions at para. 8.9 suggest a hierarchy of massing devices.

- The use of varied materiality on both the horizontal and vertical axis will break up the perceived massing.
- Varied massing and heights with transitions in scale.
- Pitched roofs.
- Plan insets

Building modelling

2.3.28 The surface treatment of building facades (Chard 8.9) may help break down the perception of monumentality of a tall and wide building. It will not materially diminish the height and mass.

2.3.29 DAS page 186 illustrates this and Block D. The insets help break the mass into three volumes, reinforced by different façade treatments of each volume of the commercial towers. Notwithstanding, this modelling and façade treatment will not remedy a fundamental concern with the location, scale, and mass of tall buildings on Plot D, as indicated in the illustrative scheme. This will only be more harmful with the larger Parameter Plan volumes. The additional volume in the Parameter plans compared with the illustrative scheme will not offer the opportunity to remedy concerns with the illustrative scheme by adding or removing volumes across and between plots, because the Appellant will expect to maintain the overall quantum of development proposed in the outline application. This has already been demonstrated where The Appellant

reduced the height of Block D transferring the lost volume to Block A and thereby breaching height and massing guidance for Block A and the Scheme as a whole.

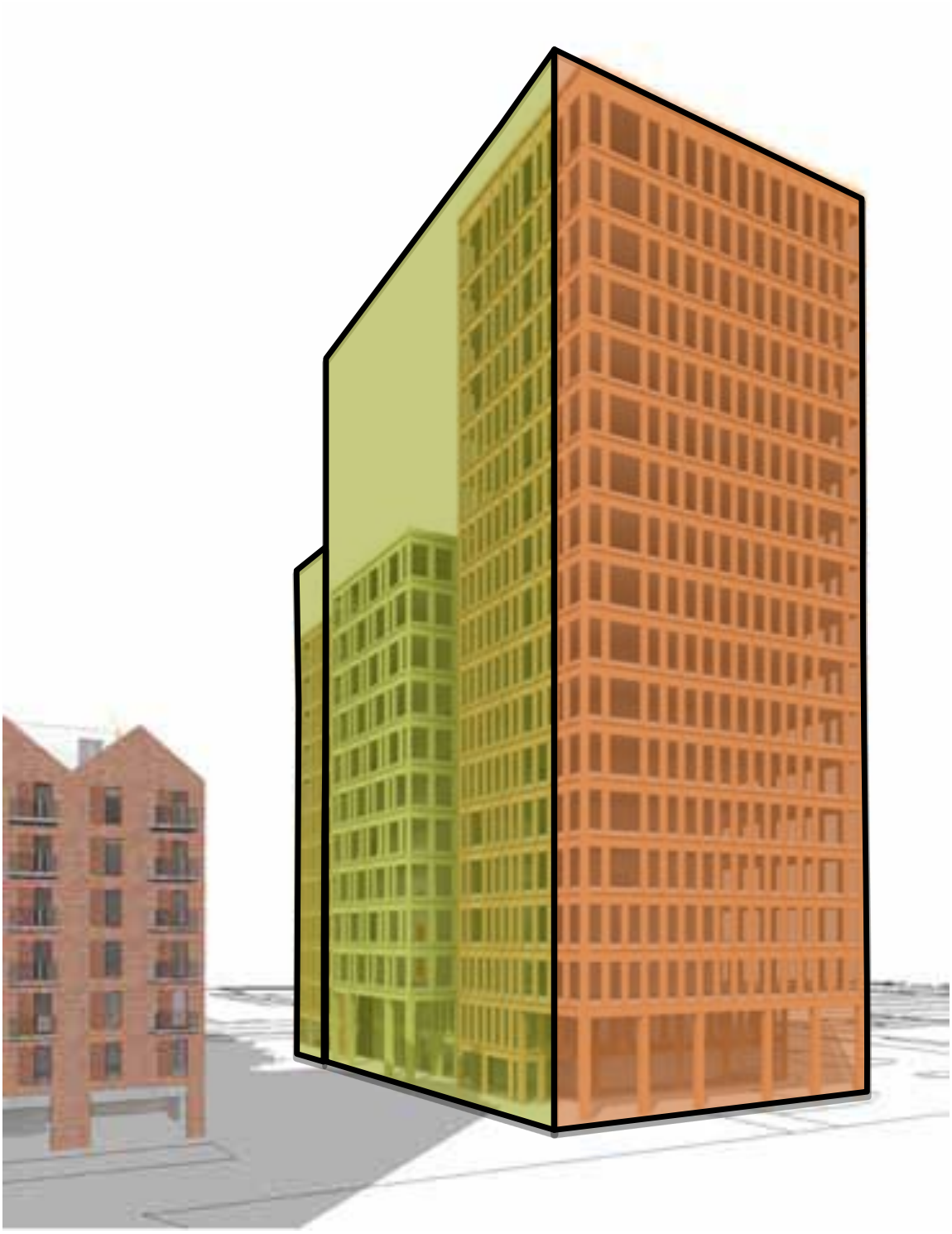


Figure 11.Block D illustrative commercial scheme (DAS page 186) with parameter plan massing shown

2.3.30 The illustrative scheme for Block D below shows how the Parameter Plan heights for the middle block and part of the rear block will be permitted to rise as tall as the part of the block closest to the viewer, and the front and rear block may be as wide as the middle block. This demonstrates how the Parameter Plans will act as an incentive to exceed the illustrative scheme volumes, which are already unacceptable.

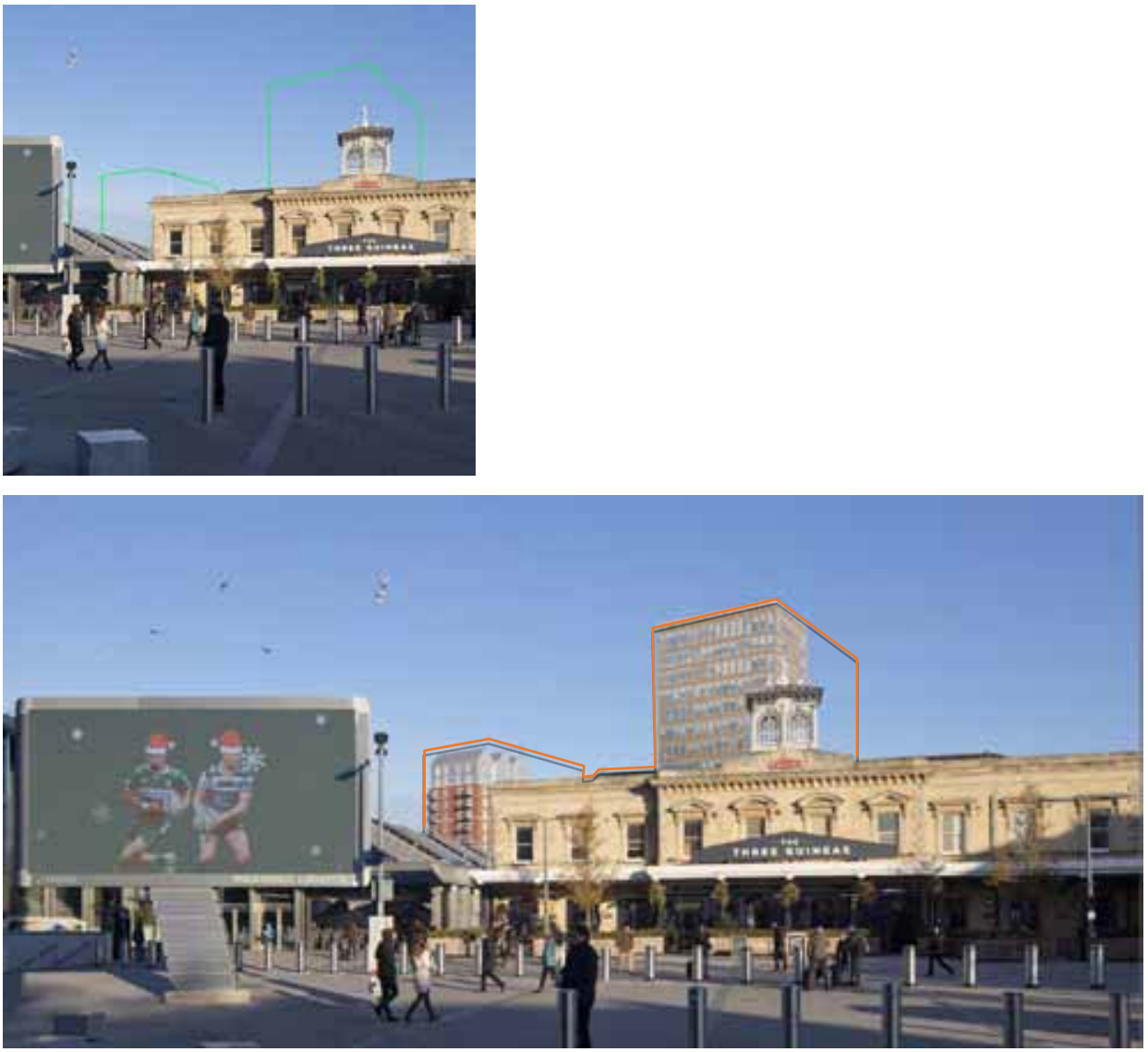


Figure 12.Site Context Photo 25: View north from Station Square with Appellant's wireline above and the illustration of the commercial scheme from DAS (page 205) with the wireline superimposed below showing how the parameter plans allow a greater building mass than shown in the illustrative scheme.

2.3.31 The DAS shows (page 186), but the design code neither encourages nor requires stepped horizontal building/plot boundary lines. This will help to break up the mass horizontal to create the impression of individual buildings but will offer decreasing value as buildings

rise higher and from many viewpoints. The Design Code page 42 mandates that the proposed mass (only in the case of residential development) should be *'tower shaped'*.

2.3.32 The Design Code provides very little guidance or requirement for building modelling and setbacks at higher storeys (over and above the parameter plan heights) so that the mass of buildings diminishes as they rise higher.

Pitched roofs

2.3.33 Emphasis is placed on the contribution of pitched roofs (Chard PoE para. 8.8 page 53), reflecting locally distinctive characteristics and as a device to break up the massing. This will have no significant material effect on the overall massing.

2.3.34 It is suggested that this is appropriate for roofs on lower-rise elements. However, the pitched roof device is widely deployed in the illustrative scheme on low, medium and high-rise elements.

2.3.35 The Design Code does not specify the orientation of the pitched roofs, which may therefore be parallel with the building face and offer little or no perceived effect on the massing, particularly for tall buildings. The Code also suggests roof terrace amenity space will be provided in areas where the illustrative scheme indicates pitched roofs.

Design code cluster controls (8.14)

2.3.36 Mr Chard (8.14 page 64) claims the Design Code will control the cluster of buildings on the Appeal Site to create a 'coherent townscape element'. At 6.19 (page 25), he claims the new built form will be seen as a 'coherent cluster signposting the station'.

2.3.37 The Appellant's scheme proposes what I have termed a 'toast rack' and 'a string not a cluster of tall buildings' (PoE 2.3.4.18) when CR10(ii) requires 'a new cluster of tall buildings with the station at its heart'. and RSAF (6.13 page 43) 'buildings should rise up around a station 'nexus' and 'a new cluster of tall buildings forming a new and distinctive skyline' (6.12 and 6.13, page 134).

2.3.38 The Design Code does not offer controls to create a cluster of buildings on the site that can contribute to the station cluster. It will not guarantee a policy-complaint scheme. Tall buildings at the north west corner of the site cannot signpost the station, particularly

when they occlude views of tall buildings, such as 80 Caversham Road, that do contribute to the cluster and signpost the station.

Design code building heights

2.3.39 Design Code 3.3 (page 26), Building Heights, offers only two site-wide mandatory and no discretionary controls:

- *'Development adjacent to the railway station is expected to create a Local Landmark marking the station as a focal point within Reading.*
- *Development overall height on plot A should be lowest, rising to maximum height on Plot D. This rationale applies to the lower parts of the development as well as to the taller parts.'*

Design code minimum distances

2.3.40 At 8.14 (page 55), he claims offsets between the parcels at ground level 'will allow visual permeability between built form on different parcels, allowing them to be viewed as distinctly separate buildings, thereby articulating the mass, scale and height of the cluster as a whole'.

2.3.41 Design Code 3.2 Separation distances (page 25) defines minimum distances between plots, reflecting the parameter plans. However, the code opens up possible exceptions - *'Where any of these separation distances cannot be achieved, justification will be required and design measures will need to be incorporated to ensure the privacy of residents is maintained. These design measures should not detract from the overall design.'*

2.3.42 The plot boundaries, offset distances and heights are established in the Parameter Plans.

2.3.43 Contrary to Mr Chard's claim, the Design Code offers no further significant control over mass, scale and height.

Plot design codes

2.3.44 The Plot Design Codes contain guidance on height, with further height guidance contained in the 'plot layout and geometry' sections.

Height Mandatory • 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. • Taller buildings should be placed along The Avenue and Vastern Road.	**Mandatory** • 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.	**Mandatory** • 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.	**Mandatory** • 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.
Plot Layout and geometry *Discretionary* Part of the block could be a taller landmark building on the south eastern facade facing The Avenue.	*Discretionary* Part of the block could be a taller landmark building on the southwestern facade facing The Avenue.	*Discretionary* Part of the block could be a taller landmark building on the southwestern facade facing The Avenue.	*None*

2.3.45 The plot layout and geometry design code simply describe what is shown in the height parameter plan, with no further restriction of height or mass.

2.3.46 In relation to Plot A, the Code advocates taller buildings on Caversham Road and Vastern Road, contradicting the Appellant's whole case on massing.

2.3.47 The Design Code offers minor height and massing devices such as pitched roofs, plan form insets and vertical and horizontal elements in façade and composition vertical facades, parapets and screening to roof-top plant.

2.3.48 It does not offer primary, substantive controls over scale and massing. The consequence is that the developer is free to build up to the maximum parameter plan heights whilst

the Design Code offers little clarity and no effective control to be operated by the LPA at the reserve matters stage.

Caversham Roundabout View

2.3.49 Mr Chard claims the appal scheme will form a 'landmark in views that are channelled south-eat along Caversham Road towards the roundabout (6.8 page 24). At 7.82, he claims four blocks of development will *'represent and progression from the residential character of Caversham Road that increases in height towards the centre of Reading, where the tallest element of the Appeal Scheme will mark the location of Reading Station, thereby providing additional legibility to this location'* (the station).

2.3.50 Mr Chard has provided an updated wireframe view, including the approved 80 Caversham Road Scheme.

2.3.51

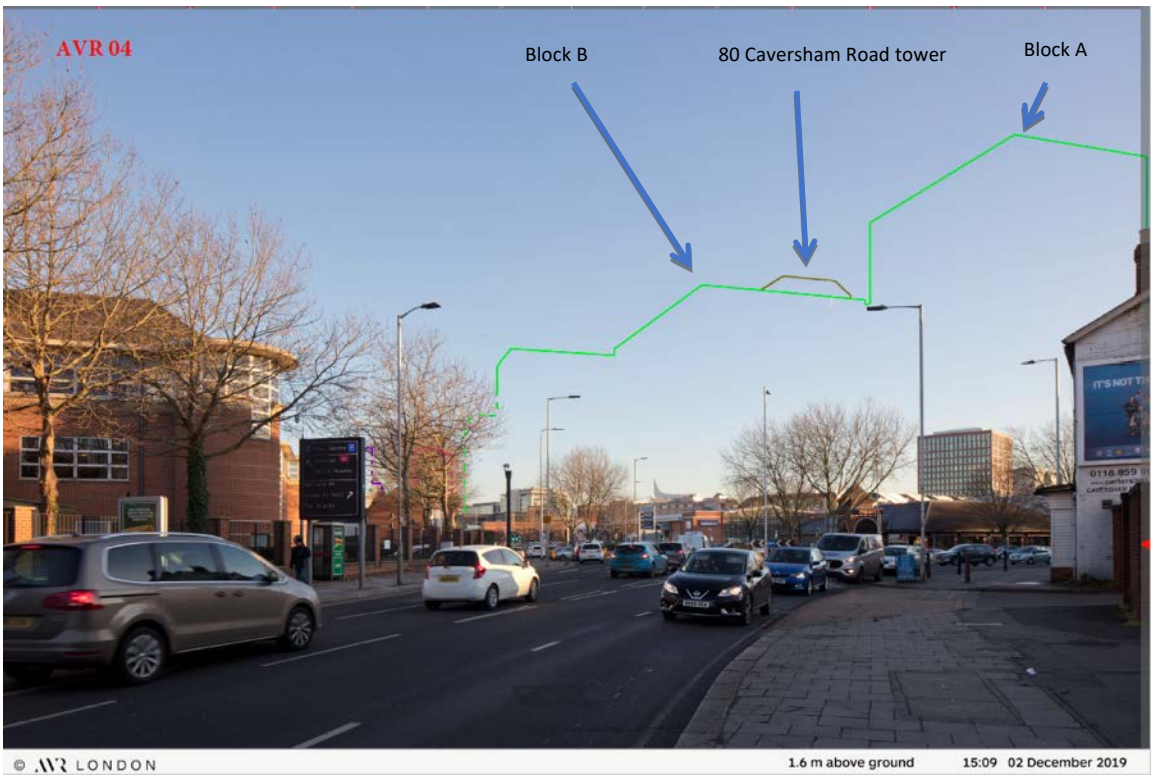


Figure 13.Appellant's wireline view AVR 04 with the tower within the 80 Caversham Road scheme only just visible above Appeal Blocks A and B.

2.3.52 What is clear from this view is that the tallest element of the 80 Caversham Scheme, marking the station nexus, is almost completely occluded by the Appeal Scheme. The view

of the tallest element is hidden and will fail to mark the location of Reading Station, thereby providing no additional legibility to this location.

2.3.53 The failure to reduce heights to the north and west across plots A, B and C means the building appears to ascend in height towards rather than away from the viewer. This is contrary to what Mr Chard claims and policy and guidance require.

2.3.54 The tallest building will seem to be on the right, mistakenly signalling that is where the station is.

Plot A

2.3.55 Mr Chard (6.5 page 23) claims there will be a transition in scale and townscape character with building heights stepping up from and respecting the existing character of the domestic scale of development north of the Appeal Site within CA12. At 7.37 page 35, he suggests plots C, B and A will reduce in height to the north west and appear suitably subservient to the RMG (the Hermes site). None of this is correct in the case of Plot A.

- Plot A is taller than the adjacent part of the 80 Caversham Road site, even though it is claimed the appeal scheme accords with the principle that tall buildings should be closest to the railway.
- Plot A heights are higher than Plot B (PP-103 P3).
- The lowest part of plot A, closest to CA12, rises to around 32m- just shy of the tall building threshold, which cannot be considered proportionate to the two and three-storey dwellings on the north side of Vastern Road.
- Buildings are set only 5m back from the kerb when the north side dwellings are set back 7-9m. The design code suggests a discretionary colonnade, but only to the south and eastern edges of the plot.
- Plot A design code mandates taller buildings should be placed along The Avenue and Vastern Road.

2.4 Views

Agreed views

2.4.1 Mr Chard states, 'all views for assessment within the TVIA ES Chapter were agreed with RBC via e-mail correspondence' (4.5 page 19).

2.4.2 The LPA was reassured by the Appellant in correspondence of 17 October 2019 that an assessment had already been carried out to identify any potential significant effects. It was on the basis of this reassurance the case officer considered whether a few more views might be helpful. The Appellants assessment, which was not before the case officer at that point, was limited by a narrow isochrone that Mr Bridgland has identified as missing a potentially significant view.

Kinetic Views

2.4.3 Mr Chard places emphasis on 'kinetic views' (7.16 page 32, 7.60 page 40). He claims the setting and backdrop of the clocktower will alter as people move through the area - in ways that he has not defined or illustrated. He has undertaken no such 'kinetic' analysis, and we are left to discern important points from fixed viewpoints. For example, the kinetic view of a person travelling along Queen Victoria Road and Station Road towards the Station is a key concern.

2.4.4 The figure below shows in yellow tone those parts of Station Square South from which the tallest buildings within Plot D will appear to rise immediately behind and above the clocktower, dominating views and occluding the view of the clock tower framed against the sky. The area where the view is affected is immediately in front of the station and in views from Station Road. People may move about the square and obtain different views

of the clocktower, but the most important viewpoint, the threshold of Station Road with Station Square North, will be harmed.

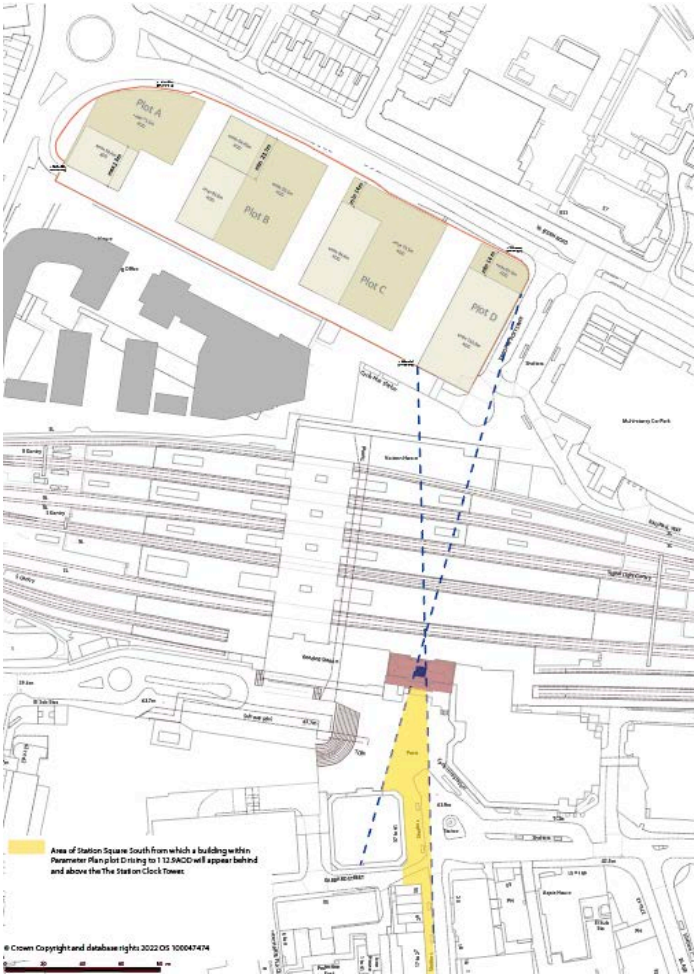


Figure 14. Parts of Station Square South from which the tallest buildings within Plot D will appear to rise immediately behind and above the clocktower

2.4.5 The heights and positions of tall buildings within the Appeal Scheme could be adjusted to move, reduce or completely remove the yellow shaded area- but this would mean either stepping outside Appeal Scheme Parameters, or reducing the overall development quantum, both of which are to be fixed at the outline stage.

2.4.6 The figure below demonstrates how adjusting the parameter plan and the appeal scheme will avoid directly affecting views of the clock tower - with development arranged on either side of the main axis, as the RSAF illustrative scheme proposes.

2.4.7 Mr Chard's focus on kinetic views distracts from the need to carefully compose the specific views defined in policy. The illustrative scheme demonstrates the effect on views

is harmful. The parameter plans make this worse and are insufficiently flexible to allow adjustments to remedy this harm.

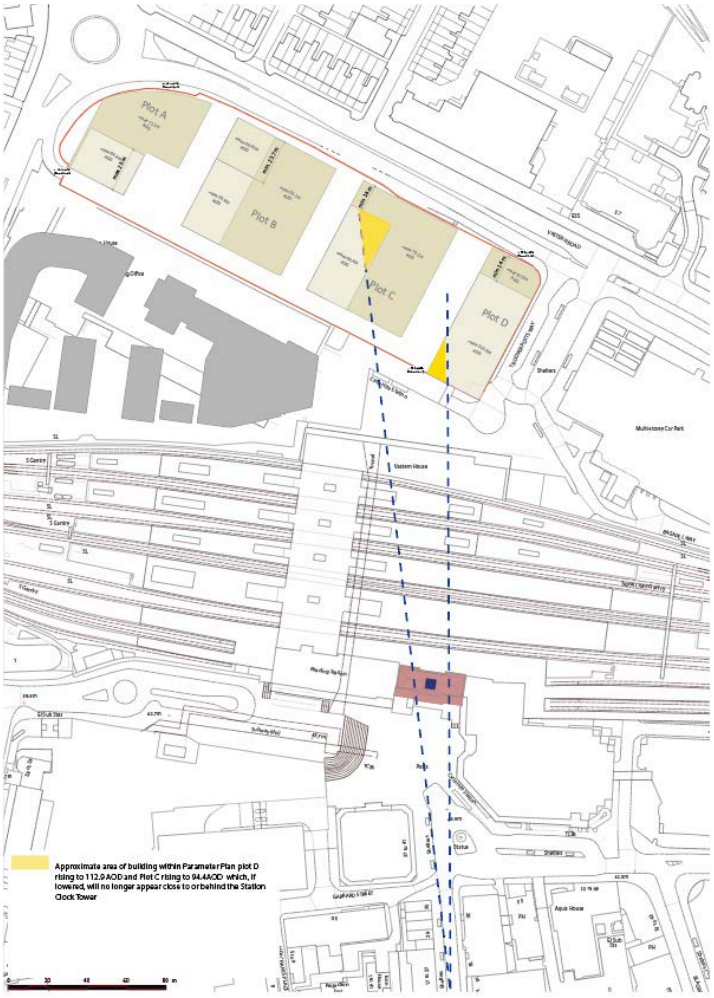


Figure 15. Potential reductions in Parameter building heights/positions to offset from views of the station clock tower.

Duke Street

2.4.8 Mr Chard comments on the visualisation of the Duke Street View in the committee report (7.63 page 41). However, he does not address the substantive point that his adopted methodology failed to appreciate an important view, and he has still not provided evidence on this.

Christchurch Bridge View

2.4.9 Mr Chard's comments on views of the station clock tower from Christchurch Bridge (7.62 page 41) are superseded by the 55 Vastern Road appeal decision, which will block that view.

2.4.10 The view of the northern station entrance with the clock tower above and beyond from Vastern Road along Trooper Potts Way is shown in Appeal Site Context Photograph 2 (Chard Illustrative Material Document B), but no wireline has been provided. A different version is shown in EA Volume 2, where a street tree obscures the tower from the specific angle selected.

Station View

2.4.11 Mr Chard (7.57-7.58) makes the case that the RSAF figures support the Appeal Scheme scale and massing and therefore accepts and supports the impact of the Appeal Scheme on the station clock tower. The Appeal scheme diverges from the RSAF illustrative scheme, which was conceived to limit the impact on the clock tower in views from Station Road and Station Square South and, specifically, ensure the clock tower would continue to appear against the sky with development rising up on either site is a carefully considered composition.

2.4.12 Mr Chard emphasises the context of 'intense redevelopment of the station area' (7.60 page 40) and the 'kinetic nature' of views.

2.4.13 In relation to the view from Station Road and Station Square South, no other planned development will appear prominent, either directly behind or above the station and clocktower. The 80 Caversham scheme is offset to the left. The 55 Vastern scheme will barely rise high enough to be visible over the main ridge of the station building.

2.4.14 Mr Chard greatly exaggerates when he suggests the setting of the foreground has been *'dramatically altered' (7.50 page 40).* The display screen he refers to is offset to the left

and, I understand, a temporary feature. The bollards are anti-terror measures - a familiar and necessary feature. Their scale and impact are not significant.

2.4.15 *Mr Chard claims 'Views of the station are kinetic in nature'* rather than a *'planned vista' (7.50 page 40).* That is not correct. The view along Station Road of the historic station entrance is a planned view, with the building and clock tower deliberately positioned to frame the view and draw people towards the station. It is a major Reading landmark (see my PoE Large-format Fig. 11), and the impact of the Appal Scheme upon that view is not simply one of many kinetic views.

2.4.16 Regarding kinetic views, Mr Chard has not studied these, and Mr Collado has not designed his scheme to take this into account. My PoE (Large Format Figure 15 CD10.3.3) shows the kinetic views along Station Road, taken from the RSAF illustrative model, demonstrating that tall buildings on Plots C and D can be sited and composed to safeguard and enhance the station's setting and clocktower. The Appeal Scheme does not.

2.4.17 Plots C and D are likely appropriate locations for landmark buildings, as the RSAF confirms and Mr Chard emphasises *(7.58 page 40).* However, that does not permit a building of any height or mass. It is unsatisfactory for him to base his visual impact assessment upon the mistaken assumption that tall buildings will be allowed as a matter of course and are *'inevitable'.*

2.4.18 All of the criteria at LP CR10(v) should be met. The RSAF identifies 'sensitive receptors' (RSAF Figure 6.10 and paras 6.31 to 6.33, page 38), and 'transition zones '(RSAF 6.29, page 37. It recognises the need to modify benchmark heights downwards in certain circumstances (RSAF 6.24, page 36), whilst RSAF 6.26 confirms landmark buildings may only exceptionally puncture benchmark heights and not every landmark identified will necessarily provide a landmark.

2.4.19 It is not clear at 7.57 that Mr Chard accepts the fundamental point that the station redevelopment should safeguard the setting of the clocktower. A point he failed to recognise in his analysis. RSAF 12.6 (page 72) states: *'the grade II listed Station building is one of Reading's most prominent historic buildings. The Station Area Framework therefore places the building at the centre of the strategy for the area'.* The setting may change, as

RASF 12.8 accepts: Its prominence and central strategic townscape role should not be diminished.

Skyline

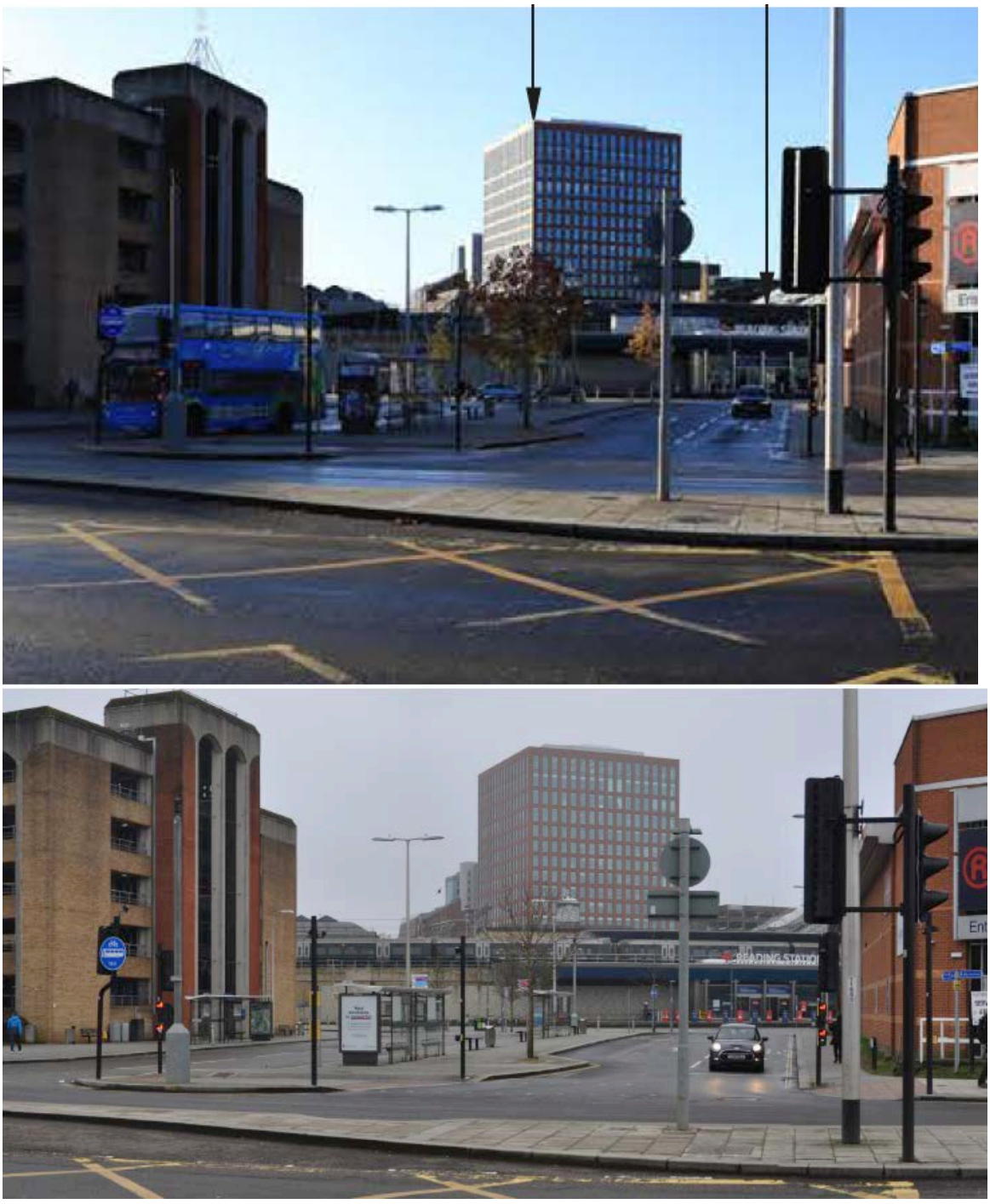


Figure 16. Site Context Photograph 2 from the EA (above) and Mr Chards View 2 from his PoE Illustrative Material Document B

2.4.20 The view below is of a commercial tower, Thames Tower, developed when Trooper Watts Way had not been opened up. The view could not be obtained before the station redevelopment and formation of the surrounding transport interchanges. Notwithstanding, it clearly demonstrates that the prominence of the clock tower is diminished by the building in the background and an arrangement to be avoided. The 'depth of field' that Mr Chard emphasises has minimal effect.

Offsets between blocks and the skyline (Chard PoE para. 8.4, page 52)

2.4.21 Mr Chard (para. 8.4 page 52) claims offsets between blocks will *'ensure the blocks of development appear as distinctly separate elements where they appear on the skyline'*. He suggests (para. 8.6 page 53) an additional distinction between the proposed blocks will be created by the depth of field available due to the scale of separation between blocks.

2.4.22 This will not be ensured in key views.

2.4.23 Where the streets between blocks align with the viewpoint, then buildings rising up within the blocks are likely to appear as separate elements. However, this beneficial effect does not help where the viewpoint is at an angle to the street. The clearest example is - the view from Caversham Road along Vastern Road (AVR 04 Chard Illustrative Material Document B), where the streets between blocks A, B and C are not wide enough to compensate for the closely spaced towers rising sheer at the plot edges and merging into a single block form with no skylight in between.

2.4.24 The viewer will not appreciate the depth of field, for example, along Vastern Road and the east-west link where the line of sight is not aligned with the gaps between blocks. Where it is available, the effect should be treated as an additional distinction.

2.4.25 The cluster massing concept, with building rising in stages towards the centre, ensures buildings in the foreground and background will appear as separate elements in views from the east, north and west- like layers of a wedding cake. The width between blocks only offers a degree of differentiation in views from broadly from the north.

2.5 North-south link

Legibility and station views - compared with the baseline

2.5.1 Mr Chard suggests improved sightlines will 'strengthen the relationship between the Appeal Site and key townscape elements such as Reading Station' and the northern station entrance and 'allow a much clearer legibility of public realm' (Chard PoE para. 8.10 page 53).

2.5.2 That legibility is already present in the view along Trooper Potts Way from Vastern Road towards the station entrance. The Appeal Scheme must offer a substantial uplift in legibility over and above the existing link between Vastern Road and the station.

Figure 17.Northern Station Entrance and historic southern station entrance clock tower from landmarks and are legible in views from Vastern Road.

Figure 18.The station is already a highly legible landmark in views from Vastern Road

2.5.3 Mr Chard overlooks key components of the view, such as the visibility of the historic southern station entrance clock tower, in his analysis. This is an important view that only came into being after 2014-15 and was not picked up in the 2018 RTBS review when it reconfirmed that there were no key views that could be blocked by tall buildings (which is true in that Block D is offset to the right).

2.5.4 The TVIA analysis emphasises the poor quality of the existing environment- the baseline- but overlooks the fact the legibility is already in place from Vastern Road to the Northern Station entrance (TVIA Site Context Photo 2 and table at 02 View South form Vastern Road - Appx 1.4a page 3). Mr Chard categorises this as 'low value'.

2.5.5 The legibility of the existing link from Vastern Road to the station entrance via Trooper Potts Way is such that the Appellant's scheme must offer some more significant

improvement over the existing. Mr Chard has not selected this view for the development of a wireline or more detailed illustration. It is not illustrated in the DAS.

2.5.6 We do not know the impact of the Appeal Scheme on the view from Vastern Road along Trooper Potts way because it has not been selected as a representative view.

The Reading Grid

2.5.7 Development in Central Reading should build on the existing grid structure of streets and places, providing high levels of access and connectivity into the centre and transport interchanges (LP 5.2.12 page 129). Policy CR2 is unequivocal that *'development should build on and respect the existing grid structure of Central Reading'*.

2.5.8 Mr Chard claims the appeal proposals (7.118 page 51) extend the existing grid structure of Reading *'in so far as is possible for a medieval town'.* His analysis confirms the Appeal Site and its setting is within the Nineteenth Century Railway Town (2.23 page 8). It forms no part of the medieval settlement[1] to the south east and is therefore unaffected by any practical physical constraint. The sole pre-19th-century vestige is the Vastern Ditch, referenced in CR11e, reinstated in the RSAF illustrative masterplan but ignored by the Appellant.

2.5.9 Mr Chard suggests any evidence of a grid structure is *'limited'* (7.118 page 51)- pointing to the vestiges of the medieval town.

2.5.10 The RTBS Appx. 2, Cultural Heritage, pages 10 and 11 describe the pattern of the medieval town, contrasting this with Reading's rapid growth in the nineteenth century. The medieval settlement is a *'composite form of urban development'* (page 11), forming a *'discrete part of the central area' (RTBS Appx. 2 page 14).* Two streets formed *'the main north south axis'* with east-west connections at Friars Road, Broad Street, Castle

[1] *see RTBS Appx 2 Cultural Heritage page 8 'The Ecclesiastical Town AD 1121-1539'*

Street/Gun Lan/Minster Road and south of the river Mill Lan and Possibly Crown Street. The 'ladder pattern' (my term) is the origin of the Reading Grid.

2.5.11 The City Centre Framework (CD7-7.46) illustrates this pattern.

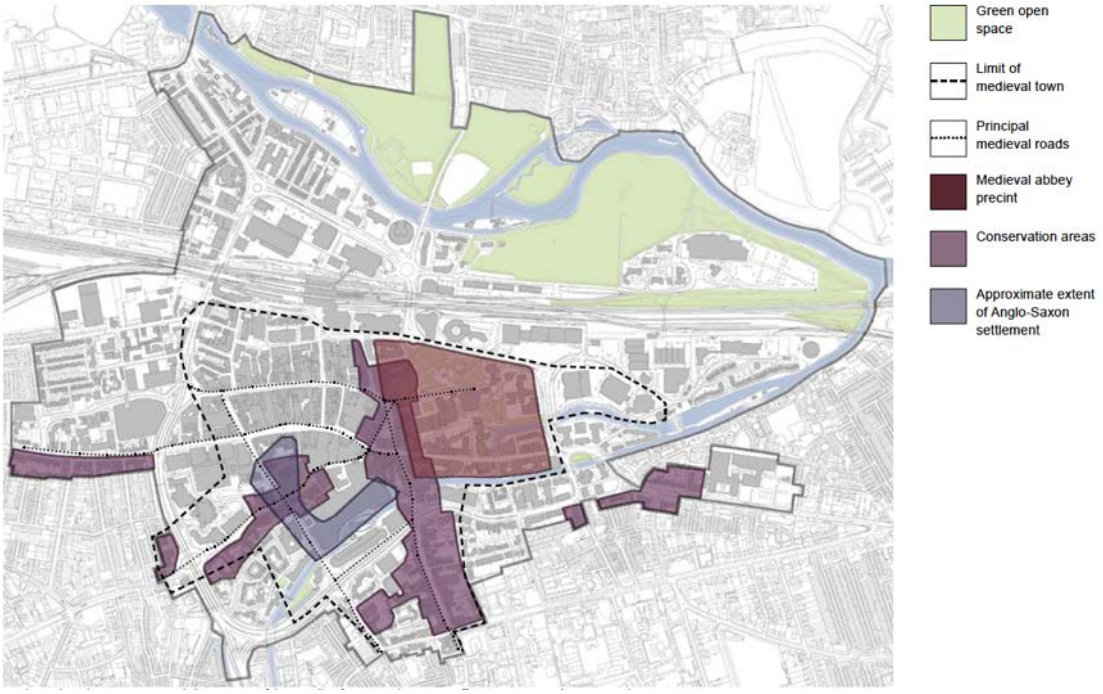


Figure 19.Extract from RCCF (Page 5, Historic Context) and the 'ladder' of principal medieval streets.

2.5.12 The RCCF of 2008 introduced the grid as a planning and layout principle for the central area:

'Historically, the urban structure of Reading has evolved as a grid of north-south and east-west routes, deriving from the original river crossing points. As the town has developed, the imposition of the rail corridors and more recently the Inner Distributor Road (IDR) has resulted in fragmentation of the grid. Within the current central core the area south of the railway and within the IDR - the urban structure is intact and should be reinforced and respected by new development. Where the grid is less well defined - generally in the areas adjacent to the rail corridors and the IDR corridor - new development should exploit all opportunities to connect to and extend the established grid of the central area. (RCCP 2.2 page 10).

2.5.13 Mr Chard claims, *'evidence of any grid structure is limited'*. However, he has not undertaken a separate townscape appraisal. His evidence is founded on the Council's townscape assessment in the RTBS, which found that Reading '*evolved as a grid of north-south and east-west routes'*.

2.5.14 It is not clear why Mr Chard's views on the matter mean the grid pattern, required by policy, should be simply set aside. Policy and guidance indicate that where the grid is not well-defined, the intention is to reconnect and extend it*:* Where it is intact, the intention is to respect and reinforce it: Where it is fragmented by the railway and IDR, the policy is to re-join the fragments.

2.5.15 Mr Chard claims the 55 Vastern Road Inspector acknowledged limited evidence of any grid structure. That is not what the Decision Letter stated. The Inspector found that *'Central Reading exhibits a loose grid structure'* (para. 23, page 5). She found: *'Some main streets are reasonably straight and broadly parallel, notably Friar Street and Broad Street east to west, with loosely connecting streets running north to south'.* That is the essence of the grid.

2.5.16 The Appeal Inspector's focus was on the degree of distortion of the grid and her observation of the presence of many winding routes with deflected views.

2.5.17 The 55 Appeal Decision succeeded because the Appellant demonstrated the straightest and best-connected route had been formed, given fundamental site constraints. In that context, the Inspector turned to consider the merits of alternative town planning morphologies, such as Gordon Cullen's 'Townscape' principles.

2.5.18 The Reading Grid forms a 'net' where streets east west and north south routes interconnect. The net may be distorted and stretched, like a fishing net, but the connections are maintained. The appeal scheme maintains and extends the grid in relation to Lynmouth and De Montford Road. However, it is an inferior 'offset grid' on the

most important north-south route. Routes in an offset grid are inherently less well connected, the path is more tortuous and legibility reduced.

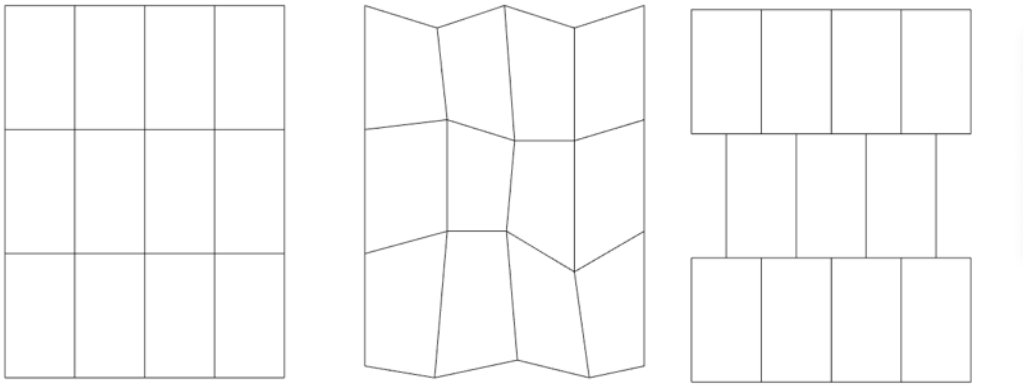


Figure 20. Examples of a strict or rigid rectilinear grid, a distorted grid, and an offset grid.

Figure 21.The Appeal Scheme north-south link will connect start of the link through the 55 Vastern Road scheme will connect in an offset grid pattern.

Direct alignment

2.5.19 Mr Chard claims the Appeal Scheme will facilitate the increased integration of the northern entrance of Reading Station into the surrounding grain, where it will benefit from improved legibility and wayfinding. The enhanced public realm between the north side of the station and Vastern road *'contributes to the opportunity for the improved legibility of a connection between the expanding town centre and the River Thames'* (6.2 page 23), and *'the legibility of the connection between the Thames corridor and the centre*

of Reading will be further strengthened by the considered block arrangement' (6.12 page 25).

2.5.20 Mr Chard claims the route will be *'fundamentally obvious'* (7.69) on leaving the station. The only thing that will be fundamentally obvious will be Block B of the 55 Vastern Scheme framing the view.

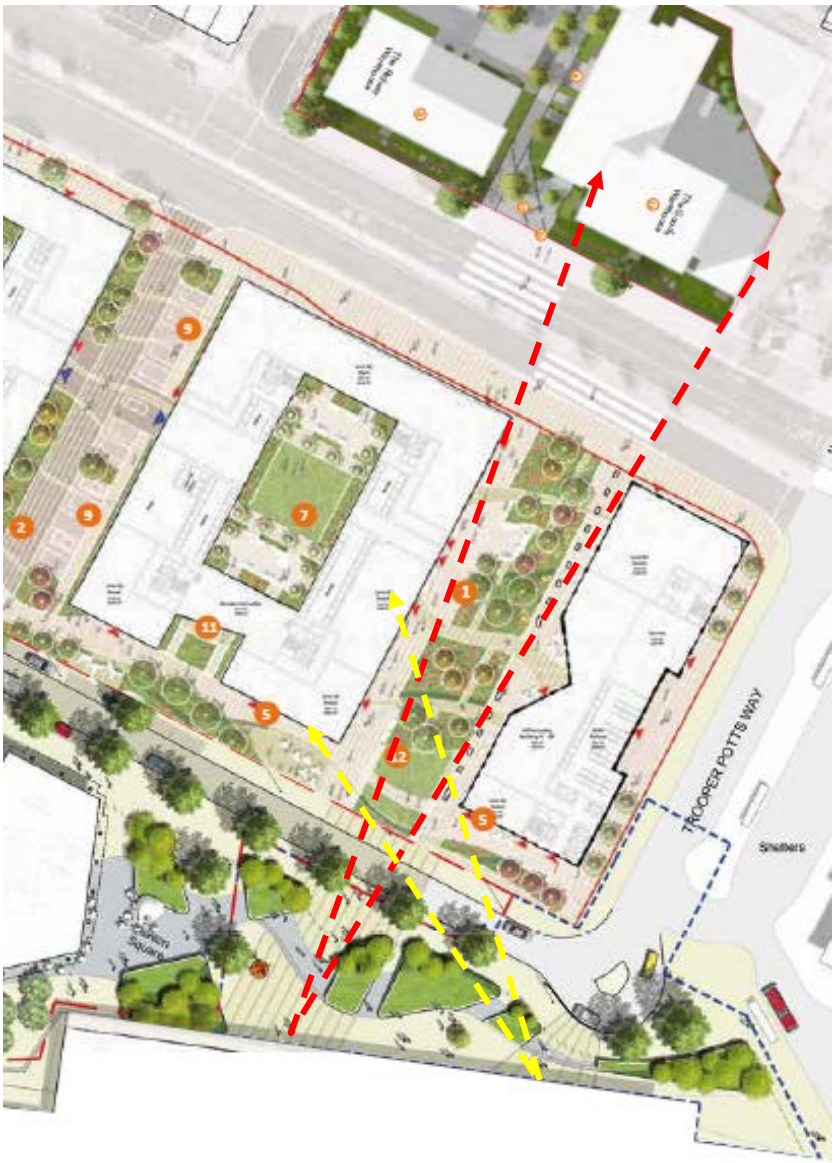


Figure 22. The view from the subway exit towards the river (red arrow) will be towards a housing block within the 55 Vastern Road Scheme. The view from the station entrance (yellow arrow) will be much more limited with Trooper Potts Way and the east-west spine appearing wider with longer lines of sight and therefore suggesting a more important rank in the hierarchy of route The arrows are the maximum available view and do not account for the arcades and oversailing parts of Block D

2.5.21 Mr Chard 7.72 states CR11e and CR11g of the local plan do not prescribe that the north-south pedestrian and cycle route must have a direct visual connection between the

station and the river. This ignores the main policy root of CR11, which requires a direct landscaped link, with the justification at 5.4.6 that if visual links are to be provided (which they are in this sub area), this will help change the perception of the area north of the station as a separate entity.

SSE

2.5.22 It is suggested that Committee Report Figure 9: *'Illustrative concept scheme model with highlighted route from North Station square to Christchurch Bridge through SSE site'* indicates the Council does not understand or will not accept the obstacle formed by the SSE equipment.

2.5.23 The 55 Vastern Road Appeal Inspector approved the alignment and form of the strategic north-south link through that site. Committee Report Figure 9 demonstrates that it is the Appellant's Scheme which fails to account of the 55 Appeal Decision, which fixed the alignment of the North-south link from Vastern Road north to the river. The import of Figure 9 remains - the Appeal Scheme needs to be revised to consider the 55 Vastern Road Appeal decision and provide a direct link between the station and the proposed entrance into the 55 Vastern Road Scheme.

2.5.24 Mr Chard's comment at 7.73 that I have not considered the long-term requirements is therefore incorrect.

Kennet Thames Spine

2.5.25 Mr Chard points out that the spine, as it travels through the town centre, does not follow a single direct route with direct lines of sight (7.74 page 43) '*fundamentally undermining the overall conceptual basis set out in the RSAF'.*

2.5.26 This entirely misses the point. South of the railway, the route follows existing paths through the established town centre grid of streets with future potential to introduce direct routes (as was envisaged if or when the John Lewis store site was redeveloped). Unlike the existing town centre, the route north of the railway is needed to open up a peripheral area on the 'wrong side of the tracks' and to integrate this fully into the central area, breaking down the barrier of the IDR/Vastern Road, and providing links to the river

and the Meadows- that is why the direct route and direct line of sight are central to the concept of extending the town centre northwards.

Subway

2.5.27 Mr Chard takes issue with the cranked alignment of the route travelling from Station Road through station square south to the subway under the railway where (7.74 page 44) '*the underpass is barely visible from Station square South due to the significant level change' and the 'confusing public realm arrangement'.*

2.5.28 Mr Chard has not considered the fact that this is an interim arrangement. The area has and will change in phases. There was no north-south connection only a few years ago, with a bus station and roadway in front of the station entrance building. The Station Hill Scheme will radically transform this area in the short term. In the long term, the station overbridge has been planned and designed to act as a future public route - when new smart technology allows ticket gates to be dispensed with altogether.

Mr Collado's evidence on the North-south link alignment

2.5.29 At 7.9.2, Mr Collado claims the townscape of the 55 Vastern Road scheme *'anchors this vista' in 'quite a classical way'*. The correct phrase is that it terminates the view providing little or no clue that a route continues through to the river. Mr Collado may claim that the Christchurch Bridge Pylon is just visible through a narrow gap in a view across the SSE site-

but that is not a view along the north-south link and will be lost if and when the SSE site is redeveloped, as policy indicates, and the 55 Vastern Road Appeal inspector accepts.

2.5.30 At 7.9.2 Mr Collado claims the gap between the Goods warehouse and Railway warehouse *'is significant'*. That gap is only 8.14 metres wide and can hardly be termed 'significant'- it is a narrow slot.

Figure 23.Extract from the 55 Vastern Road scheme illustrative masterplan showing the narrow gap between blocks A (The Railway warehouse) and Block B (The Goods Warehouse).

Figure 24.Extract from the 55 Vastern Road scheme elevation to Vastern Road showing the narrow gap between blocks A (The Railway warehouse) on the left) and Block B (The Goods Warehouse) on the right.

2.5.31 Mr Collado claims it ‘‘clearly points the way to the continuation of this pedestrian walk and cycle (sic) to the Thames path between their array of now approved buildings’ 7.9.2 page 56).

2.5.32 When the view is aligned with the point where the Appeal Scheme north-south link meets Vastern road, the view towards the gap between the Goods Warehouse and Railway Warehouse is even narrower. The clear gap at ground floor level is 0.65 meters wide. Excluding the single storey bock to the rear of the Railway Warehouse, the gaps only increase to 3.76m. The gap is simply too narrow to point the way. That is why the 55 Vastern Road Appellant emphasised (and the Inspector recognised) the need for strong

wayfinding measures to compensate for the cranked alignment of the north-south routes as a result of fundamental site constraints.

Figure 25.The 55 Vastern Road scheme masterplan showing how the gap between blocks a and b is narrower when viewed obliquely from the Vastern Park Appeal site north-south route as it meets Vastern Road.

2.6 Public Realm

Vastern Road

2.6.1 Mr Chard (7.88 page 46) refers to 5.6.7 of my SoC where he claims that I dispute the Vastern Road frontage will be improved compared with the current condition. He means 5.7.6, which refers specifically to a positive frontage thereby creating a hugely improved environment - which is disputed.

2.6.2 At my SoC 5.7.1, general referring to the quality of the public realm improving, I state in response to the Appellant's claim of the improvements to Vastern Road: *'This may be so*

compared with the existing site. However, policy and guidance require far more than a general in uplift in the quality of the public realm over the existing condition'.

2.6.3 Mr Chard claims careful consideration has been given to the relationship between the Appeal Scheme and the residential properties along Vastern Road in terms of development offsets and a *'positive and harmonious townscape composition'* (8.17 page 55). He claims the Appeal Scheme will provide a ''*positive built frontage to Vastern Road*' and *'a transition in townscape character and scale'* (6.8 page 24). Wayfinding and legibility will be enhanced through a reduction in vehicle dominance that will result from ground floor frontages (6.13 page 26). He claims the lower elements of the built form exhibiting pitched roofs relate strongly to the existing scale and character of development to the north and west (7.15 pages 31 and 32).

2.6.4 Notwithstanding these various measures and qualities, Mr Chard's fundamental argument is that the width of Vastern Road itself relieves the Appeal scheme from needing to properly relate to the area to the north (the two and three storey dwellings-part of RTBS CA12) in terms of prominence, scale, and massing and setback:

'Properties on the opposite side of Vastern Road are also afforded this level of physical and visual separation due to the similar road layout width'; 'the scale and character of the roadway provides a notable distinction in character' and *'the combination of a distinct separation and the deliberate siting of lower elements adjacent to Vastern Road, constitute a progression in scale away from the existing lower built form of Vastern Road and the tallest elements of the scheme' (7.29 page 34).*

2.6.5 The figure below illustrates how the scale and setbacks are harmful and result in an unbalanced street, out of proportion with adjacent low-rise dwellings, failing to create the integrated tree-lined avenue envisaged in the policy. This results from insufficiently generous setbacks to create a threshold or setting for the new development, consistently exceeding benchmark heights, introducing tall buildings and landmarks where none are

encouraged, with buildings rising sheer from the back of narrow pavements at 26, 40 and 49 metres tall.

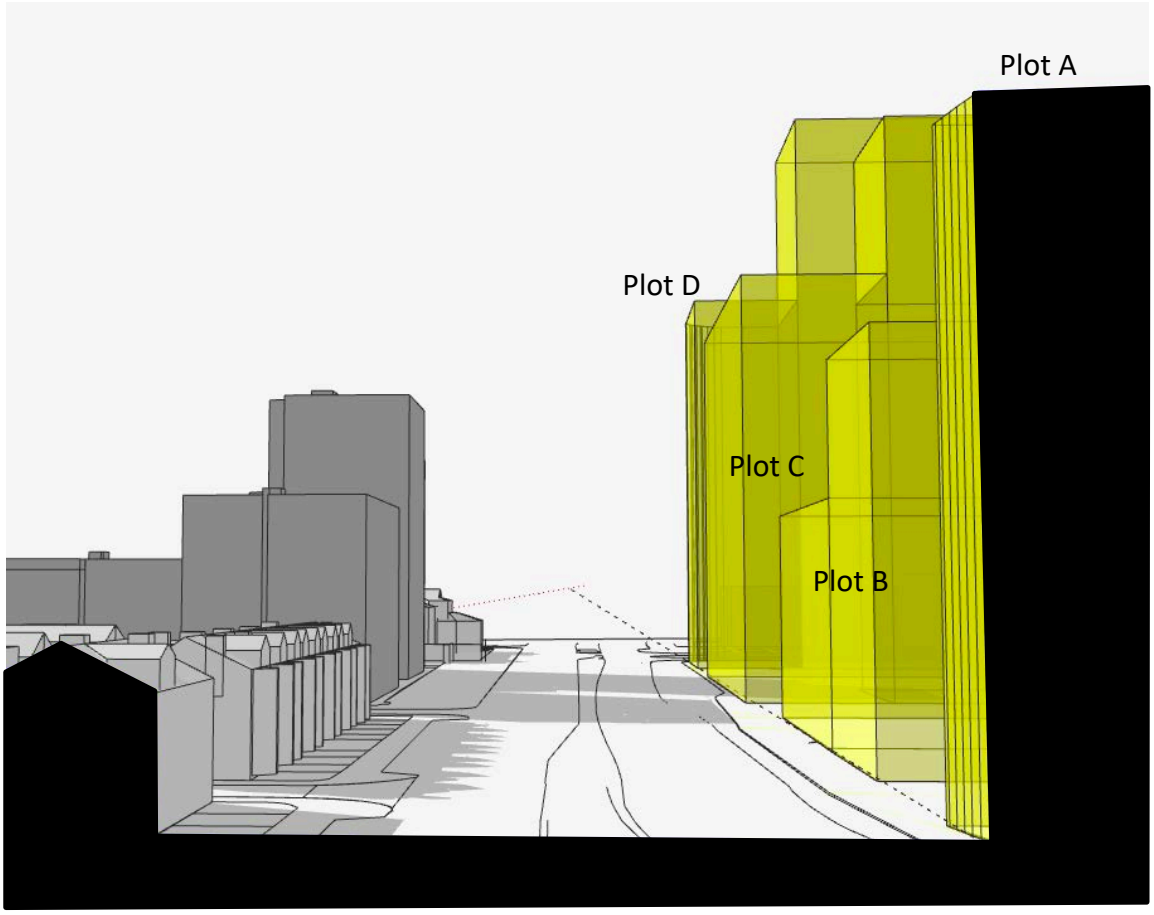


Figure 26.Indicative perspective section through Vastern Road looking east.

Caversham proximity

2.6.6 It is claimed the Appeal Scheme creates a positive built frontage to the Caversham Roundabout (8.11).

2.6.7 The illustrative scheme and the design code plot guidance show an entirely different scale, mass and proximity to the roundabout compared with the parameter plan heights for approval at the outline stage. The parameter plans encourage and permit a bulky building too close to the roundabout whilst the Design Code does nothing practical to limit this.

Station square North

2.6.8 The station square north is to provide a 'new town square' (RSAF 5.7 page 25). Mr Chard (7.84 page 46) claims the Parameter plans allow expansion of station square north to include part of the Appeal Site. The Appeal Scheme fails to provide a sufficiently generous

area and enclosure of station square north, as the RSAF illustrative scheme indicates (PoE 5.3.6). This is not offset or compensate for by providing the north-south link according to the dimensions in the RSAF.

Plot D oversailing, access and public realm

2.6.9 There is some doubt over the proposed vehicular access arrangements, which raises a concern with the treatment of the proposed public space between Plot D, the tallest proposed building, and the adjacent Station Square North.

2.6.10 The Parameter Plans show a short stretch of the Caversham Road frontage within which site access will be provided and a zone midway along the Vastern Road frontage in which site egress is to be provided. The illustrative phasing parameter plans (PP-114), show an access road travelling along the southern boundary of the site from Caversham Road and connecting to Trooper Potts Way, except where the road is not shown as it travels along the southern boundary of Plot D with the throat of the access as it enters Trooper Potts Way still shown.

2.6.11 Design Code 3.4, page 27, states as mandatory that the site should be accessed through a single point on Caversham Road. That would ensure vehicles and vehicle routes would not encroach upon or bound the station square of cut across the north-south link. The

Appeal Scheme leaves access from the east unresolved with the potential that the public realm and pedestrian priority will be eroded at the reserve matters stage.

2.6.12 The illustrative masterplan (My Main Proof Large Format Fig 23) shows the ground floor footprint of Plot D showing trees and shrubs or perhaps a lawn to the south of the plot. The Parameter Plan permit any building to cantilever out over this area.

Figure 27.Appellant's illustrative masterplan showing the Parameter Plan footprint of Block D (red and ground floor footprint (yellow dashed).

2.6.13 Mandatory Design Code Access / Entrances / Servicing for Plot D (page 42) confirms:

- Servicing should be accommodated from Trooper Potts Way on the east boundary of Plot D.
- Retail servicing and collection should be located in proximity to adjoining uses (office or residential) to minimise the impact of servicing on the public realm.
- The main access for residential and/ or office uses should be placed on the west boundary, which faces the Kennet-Thames Spine connection.

2.6.14 Fig 14, page 27 of the Design Code shows no access or servicing for Plot D within the site boundary, and the mandatory text states the site should be accessed through a single point on Caversham Road.

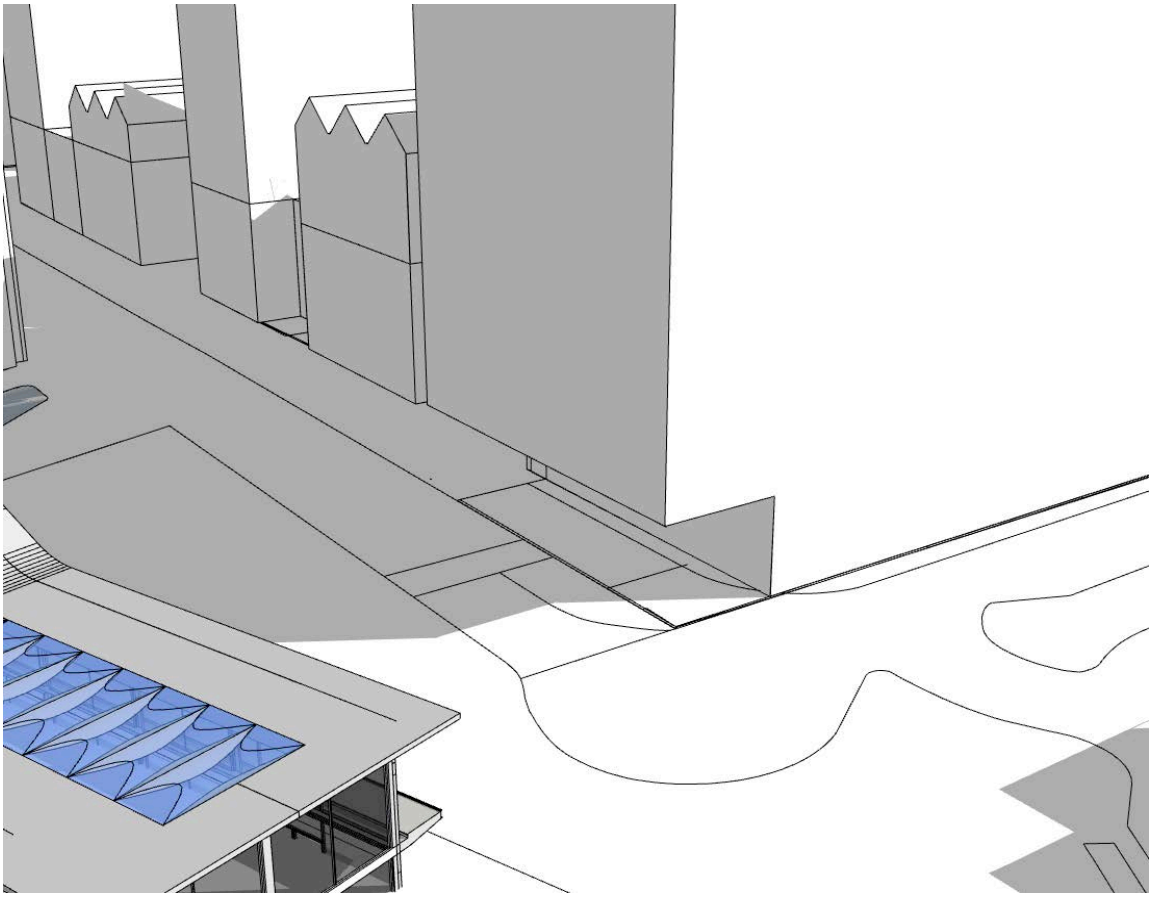


Figure 28.Block D oversailing

2.6.15 Mr Chard claims (7.95 page 47) that the scheme will provide a car-free route from the railway station to Vastern Road. The primary vehicular access route will be from Caversham Road (7.97) with a tree-lined route that *'will allow access to building services, deliveries, emergency access and access to car parking*'. Mr Chard claims (7.99 page 48) buildings will not extend into areas identified as publicly accessible routes and open

spaces on PP102 (although PP102 does not positively identify publicly accessible routes and open spaces).

2.6.16 Mr Chard claims at 7.99 (page 48) that no building will over sail the public realm when it clearly will. To the south of block D, the public realm area will be over sailed from the second floor and above. The same area may also be needed to provide vehicular access.

3 Design (Mr Collado)

3.1 The Existing Site

History

3.1.1 Mr Collado suggests (3.2.4 page 8) states redevelopment works since 1989 have incorporated means of linking the two sides of the track for better connectivity and more even growth. It is not clear what works he refers to.

3.1.2 The mid-Victorian station included a public subway that closed in the late 20th century. A new public footbridge (with a parallel "revenue side" to access platforms) was constructed, connecting the 1980s concourse to the station car park on the north side of the tracks. That bridge connected to the car park lifts and stairs opening out into what is now Trooper Potts Way and connecting to Vastern Road. The bridge was replaced with the new public subway on completion of the station redevelopment. Before Christchurch Bridge opened around 2015, the nearest Thames Crossing connecting the town centre to Caversham were Reading Bridge and Caversham Bridge.

3.1.3 Mr Collado misrepresents the area's history to make an unfounded claim that the existing Retail Park has *'undone some of the work that was previously carried out to improve connectivity'.* This appears to be an attempt to suggest poor long-term planning when the pattern is one of co-ordinated long-term planning to realise the objective of connecting the town centre to the Thames and Caversham.

Access

3.1.4 Mr Collado (3.3.4 page 9) criticises the *'indirect and almost hidden'* existing route to the Christchurch Bridge that is *'heavily reliant on signposting rather than natural wayfinding'.* That is a temporary arrangement intended to become a secondary link after completing the main north-south link. It forms a baseline against which the main link can be assessed, although an improvement against that baseline is not sufficient. He ignores that 60% of

that route from the station and subway entrance to Norman Place has a direct line of sight.

3.2 Opportunities and constraints

Grid

3.2.1 Mr Collado sees the grid pattern as an opportunity that Mr Chard disparages (5.1.3 page 25) *'allow for the development to continue the existing grid street pattern'*.

3.2.2 Townscape

3.2.3 Mr Collado (5.1.6a page 25) proposes combining the opportunities set out at 5.1 'within an architectural 'piece' that contains taller elements to help achieve the Council's townscape policy objectives'. He then sets out his understanding of the 'Council's townscape policy objectives'. At 5.1.6b, he proposes a townscape policy that does not appear in the LPA policy and guidance: 'In line with planning guidance, the site will provide the local landmark on the northern side of the railway station. The landmark will complete the 'gateway' into Reading with the emerging development of the Station Hill Site'.

3.2.4 No policy requires the Appeal Site provides '**the** local landmark on the northern side of the railway station'. The RSAF proposes five potential landmark locations within Allocated Site CR11e. The concept of a single totemic landmark within the Appeal Site is Mr Collado's construction which conflicts with the idea of a 'District landmark' within RSAF plot S2 (Station Hill).

3.2.5 There is no proposed 'gateway into Reading' that combines the Appeal Site with Station Hill to the exclusion of other sites- such as 80 Caversham Road.

NS link

3.2.6 On 5.1.7, page 26, Mr Collado recognises the need to distribute routes through the Appeal Site to provide visual and physical connections with the roads opposite Vastern Road. He names Lynmouth and De Montford. A central issue in this appeal is to extend Mr. Collado's

logic to align a route through the appeal site to align with the 55 Vastern Road route opposite, across Vastern Road.

3.2.7 At 5.1.7c (page 25), he recognises the opportunity to create a continuous route from the centre of Reading to the green amenity of Caversham.

3.2.8 At 5.2.3d, page 28, he recognises a significant opportunity to improve access by accommodating the new links with a *'high level of permeability in line with the North-South route proposed by policy'.* The definition of a high level of permeability is a central issue in this appeal. Mr Collado mistakenly claims in the same paragraph that *'The RSAF fixes the position of this route', which restricts the layout of the building plots at the eastern end of the site'.* In many other respects, the Appeal Scheme does not follow any 'fixed' route positions (e.g., the alignment of the east west spine, the southern limits of parcels A-D) in the RSAF, so, strangely, Mr Collado believes he is constrained only in relation to the link alignment. The 55 Vastern Appeal approval has now fixed the future alignment of the link north of Vastern Road. The current Appeal Scheme now needs to adjust to this new fixed route to provide a continuous route with visual and physical connections and high levels of permeability. That is necessary if the comprehensive approach is adopted, as it must be.

Vastern Road

3.2.9 At 5.5.2, page 27, he recognises 'Vastern Road is important as any scheme needs to consider how it enables the setting of Vastern Road to be improved for existing residents and crossed to improve legibility and access to the Thames'. At 5.1.8c, Mr Collado highlights the opportunity to address planting along Vastern Road and improve this major traffic route to benefit current and future residents. The capacity to provide that planting in the Appeal Scheme is severely restricted by the narrow pavement widths proposed, with the parameter plans showing this is as narrow as 5 metres.

3.3 Design Evolution

Design changes

3.3.1 Mr Collado's diagram 6.1.5 page 31 illustrates how the scheme's massing was adjusted, reducing the height of Block D but the raising the height of Block A, contradicting the Appellant's desire for a gradation in scale from west to east.

3.3.2 It is confusing that Mr Collado's diagram on page 31 refers to residential and non-residential use maximum heights when no such differentiation exists in the parameter plans or schedule. It also shows massing for plots B and C that does not correspond with the parameter plans heights.

3.3.3 If Mr Collado's case is that the scheme was amended in response to the LPA discussion, I would expect to see evidence of clear and consistent information placed before the LPA on which to base that discussion. The sequential development of mass and height indicated in the illustrations in Mr Collado's proof, pages 31- 35 do not develop into the proposed parameter plan heights and massing.

3.4 The illustrative scheme

Height and massing

3.4.1 7.4.1 page 42 Mr Collado claims the text he sets out at parts a and b is stated in either the Local Plan or RSAF. That text does not appear in either document.

3.4.2 At 7.4.1(a). M Collado refers to a 'gradient of height' that 'reaches a maximum closest to the station'.

3.4.3 Whereas CR10(ii) 'CR10a, Station Area Cluster' states; 'follow a pattern of the tallest buildings at the centre of the cluster, close to the station' and 'step down in height from that point toward the lower building at the fringes'.

3.4.4 The RSAF confirms the location of the *'crown' (RSAF Fig. 6.5) is 'the area close to the southern station entrance' (RSAF 6.15 page 34).* The cluster's centre lies over the station

(the *'nexus'* at RSAF 6.12 page 34), and the tallest points in the cluster are the *'District landmarks'* at RSAF Plots S2 and S11 (RSAF Fig. 6.8 and 6.9).

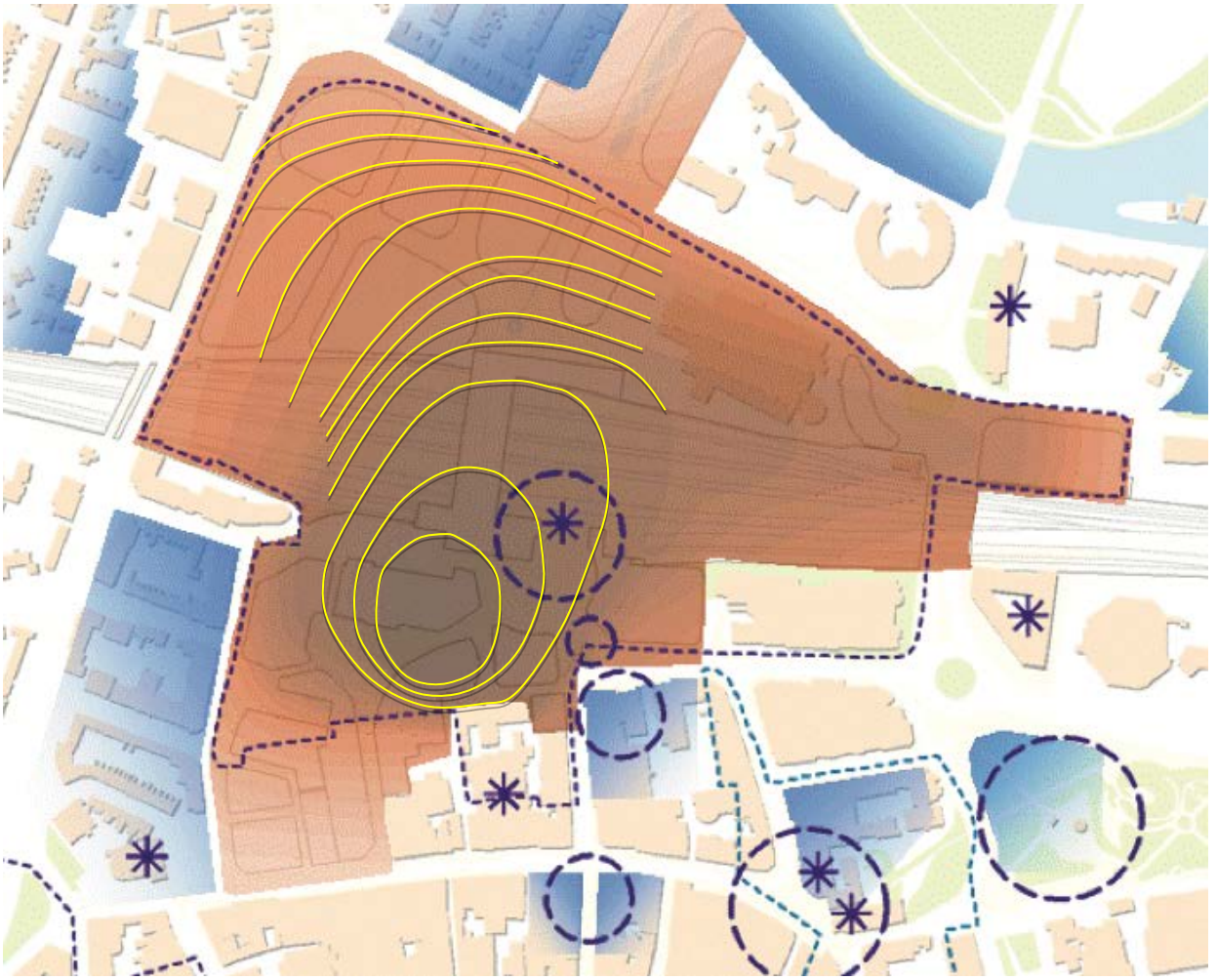


Figure 29.RSAF Figure 6.10 Tall building location guidance 'overall height strategy' contours highlighted in yellow- the 'highest' at the centre and 'lower' at the periphery.

3.4.5 At 7.4.1(b), Mr Collado claims the RSAF or LP state: 'Plot A to be the lowest, rising to Plot D which is described as a local landmark, creating a focal point for the station and the centre of Reading'. That is not a correct reading of either the local plan or RSAF.

3.4.6 The focal point for the station and the centre of Reading are district landmarks in RSAF plots S2 and S11. Local landmarks might wrap around S1 and S2; These could be tall buildings (i.e., twelve residential storeys or above) within plots B, C and D (and the east

corner of 80 Caversham Road), as the RSAF guidance on landmarks confirms (RSAF Figs. 6.8 and 6.9).

3.4.7 The local plan and RSAF do not justify a singular 'tallest' building on plot D or for tall buildings across all four proposed plots.

3.4.8 Mr Collado has correctly interpreted that the local plan and RSAF indicate *'relative relationships and hierarchies'* (his term). Still, he misinterprets what is said to justify an approach to height and massing that does not follow policy and guidance.

3.4.9 The diagram on page 42 of Mr Collado's proof is reproduced from the DAS. I have already explained (see Main Proof Fig.8 and the discussion above) that neither the Parameter Plans nor the Illustrative scheme follows this pattern.

3.4.10 At 7.4.3 (page 42), Mr Collado is concerned that the Appeal Scheme Plot D heights should not drop below the height of Thames Quarter (RSAF Plot N11) and *'begin to conflict with the hierarchy envisaged within Reading's planning guidance'*. He illustrates his misunderstanding of the policy because RSAF Plot N11 is identified as a *'district landmark'* in RSAF Figure S11 and an exception to the general massing principles. Plot D should therefore be expected to be lower than Plot N11, not higher, as Mr Collado believes. Making Plot D lower would not conflict with hierarchy.

Public realm

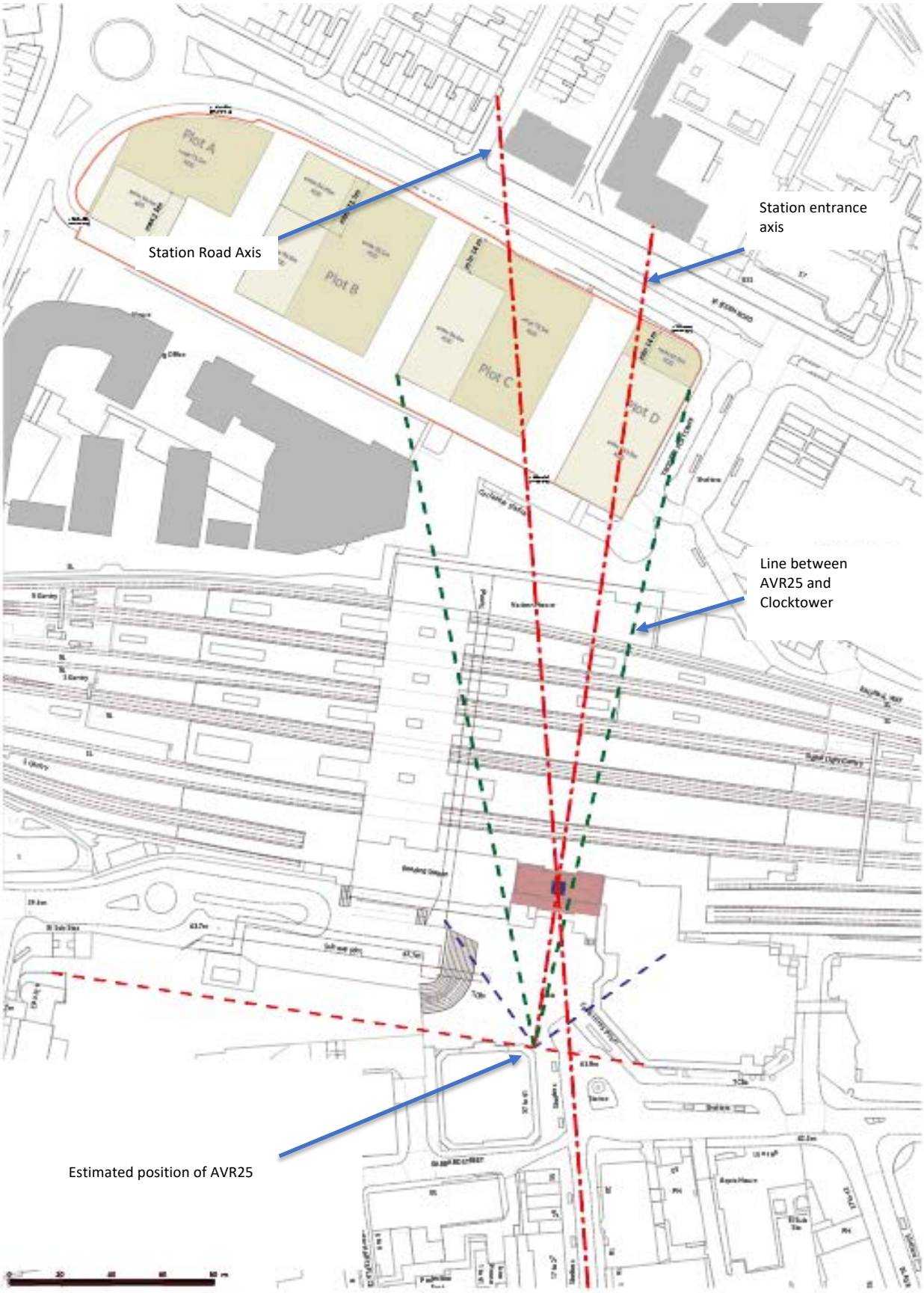
3.4.11 The illustration on page 56 is misleading as to the likely proportion of building footprints and the extent of the public realm.

- The extent of Block D is greater than shown when the oversailing and arcading are taken into account.
- The drawing shows podium level private open space with the centre of Blocks C and D, not the public realm.
- The illustrative scheme buildings are set back from surrounding roads when the parameter plan permits them to creep much closer, narrowing pavements and areas for planting.

Figure 30.

Figure 31.The Appellant's illustrative masterplan with Parameter Plan building footprints overlaid (arcades and oversailing areas have not been shown)

Appended Figure A: Axes and viewpoints



Appended Figure B: RSAF Illustrative Scheme Plot N% and N6 Tall Buildings (RSAF Fig. 14.1 page 80)