

Mr. Jonathan Markwell  
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Development Control  
PO Box 17  
Reading  
Berkshire  
RG1 7TD

**Our ref:** WA/2020/127747/01-L01  
**Your ref:** 200188  
**Date:** 14 April 2020

Dear Jonathan Markwell

**Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floor space (A3 use class), together with a new north-south pedestrian link, connecting Christchurch bridge to Vastern Road.**

**55 Vastern Road Reading RG1 8BU**

Thank you for consulting us on the above application, on 17 March 2020.

We have reviewed the following documents:

- Flood Risk Assessment (FRA) produced by Stantec dated January 2020
- Phase I-II Geo-Environmental Site Assessment 55 Vastern Road Reading Berkshire RG1 8BU by Omnia dated November 2019
- The Old Power Station, Vastern Road, Reading Proposed Drainage Strategy by Stantec dated January 2020.
- Ecological Assessment by Ecoconsult, December 2019
- Design & Access Statement by Berkeley Homes, Oxford and Chiltern Ltd, January 2020

### **Environment Agency position**

We object to the development proposed as part of this planning application due to its likely effect on the River Thames. This habitat (Rivers) is listed as being of 'principal' importance under s41 of the Natural Environment and Rural Communities (NERC) Act 2006. Insufficient information has been provided to assess the risks posed by this. We therefore recommend that planning permission is refused.

### **Reason(s)**

England's Biodiversity strategy identifies those priority habitats which are also listed as being of 'principal' importance under section 41 of the NERC Act 2006. This Act states that local planning authorities must consider these habitats in their decision-making, because of their duty to conserve biodiversity (section 40).

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In this instance, the proposed development may have a detrimental effect on a priority habitat that we have a role in protecting. The application does not include adequate information about the measures proposed to assess and address the risk to ensure protection of the river in this location. In particular the application fails to address adequately the issue of tall buildings shading the river and its marginal habitat.

This objection is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

The Design & Access Statement (DAS) refers in paragraph 2.8.5 to an Environment Agency No Build Zone 8m from the river edge and a Reading Borough Council Policy Buffer 10m from the river edge. It should be noted that the 8m buffer refers to the Land Drainage Byelaws, but for ecological purposes, this buffer should be a minimum of 10m, and depending on the site and circumstances, could be more.

Paragraph 2.8.4 of the DAS shows building heights along the river on either side of the application site as being three or four storeys tall, with the anomalies of Clearwater Court and Reading Bridge House on either side of Reading Bridge being taller. The illustration on page 90 of the DAS show the two buildings closest to the river being 10 storeys and 8 storeys high, much taller than those on either side. Being on the southern bank of the river, these tall buildings would cast shade over the river and, in particular, the marginal planting established along this southern bank as part of the mitigation measures for the construction of Christchurch Bridge.

In Appendix 5 (Transient Overshading) of the Daylight/Sunlight Report (EB7, 19 December 2019), the diagrams appear to suggest significant shading of the river/river banks throughout much of the year, although the full width of the river is not shown. The Ecological Assessment (Ecoconsult, December 2019) deals with shading in paragraphs 7.2.2 to 7.2.5 stating that not all parts of the river will be shaded throughout the day and that shading will be less in summer than in winter, but does not address the issue of shading of the marginal vegetation on the southern bank. This report states in paragraph 7.2.4 that the River Thames in Reading has been greatly modified, has hard banks and lacks natural riparian habitat (such as woodland, marsh, swamp, individual trees and marginal vegetation). This gives additional value to the marginal vegetation that has been established on the southern bank. Arguing that other buildings already cast shade, does not make it acceptable to cast more shade, particularly on one of the very few areas of marginal vegetation on the Thames through Reading. Referring to maps from over a hundred years ago saying that there were once trees here, and trees cast shade, is a tenuous excuse for allowing such an extent of shading now.

In our responses to previous consultations from the applicant and from Reading BC, we stated that the marginal vegetation in this location should not be impacted by shading and that the tallest part of the development should be towards the road in order to minimise the impacts, but this does not appear to have been taken on board.

With regard to the proposed green buffer between the development and the river, this should be free from built development, hard standing and formal landscaping and should be designed to provide a net gain in biodiversity. Additionally, planting should

use locally native species of UK genetic provenance. Drawings 448.LA.101 Rev A (Landscape General Arrangement Plan) and 448.LA.102 Rev A show, however, that much of the buffer would have amenity grass rather than wildflower grass. Where a species rich grass mix is proposed, this uses a wet grassland mix and is further up the slope from the towpath than the amenity grass where it would be unlikely to get wet.

With regard to the stated 'native' riparian shrub mix, several species are not native, or not suitable. *Cornus alba* is non-native, *Cornus avellana* does not exist (perhaps *Corylus avellana* was intended) and *Salix lanata* is native to the UK, but is a mountain plant found in the uplands of Scotland and is not suited to this location. These should be removed from the planting mix. With regard to the trees proposed, *Quercus palustris* is non-native and should be replaced with one of the UK's native oak species and the proposed *Alnus glutinosa* can be affected by phytophthora root disease and planting them can run the risk of importing this to areas currently unaffected. Consideration should be given to substituting this species for another native riparian tree species. *Betula nigra* is again non-native and should be replaced with the native *Betula pendula*.

The buffer zone along the river is very narrow in relation to the height of the buildings, particularly as this has the existing towpath within it. To give a meaningful gain in biodiversity, this buffer should be wider and have a greater emphasis on native species. The corridor leading from Vastern Road to the river should be greener and more biodiverse than is currently shown to benefit people and wildlife.

### **Overcoming our objection**

It may be possible to overcome our objection by submitting:

- Detailed drawings showing the buildings nearest the river being significantly reduced in height or moved a greater distance from the river in order to reduce the impact of shading of the river and its margins.
- Details of an amended landscape plan for a greater width of buffer and a planting scheme using locally native species of UK genetic provenance.

### **Advice for Applicant**

Should you wish us to review any technical documents or want further advice to address the environmental issues raised above, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The terms and conditions of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us.

### **Advice for Local Planning Authority**

Please note we also have issue with this application regarding flood risk and contaminated land. We will address these through recommended conditions if the above objection can be overcome.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, we will recommend the inclusion of conditions on any subsequent approval.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours faithfully

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