

# Memo

**To:** Jon Markwell, Planning  
**From:** Sarah Hanson, Natural Environment Officer, Planning  
**CC:** Giles Sutton, GS Ecology; Darren Cook, RBC Transport DM  
**Re:** Consultation on an Application

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**Application No: 200188/FUL**

**Address: 55 Vastern Road, Reading**

With reference to the DAS, Tree Survey and AIA document dated November 2019, Illustrative Masterplan Rev A, Landscape Planting Framework Plan Rev A, Landscape GA plan Rev A and to the EA's comments of 14 April 2020, I have the following comments which incorporate many given at pre-application:

As you know, any development on this site should meet various landscape design principles, as indicated in the attached email. In addition, a number of natural environment related policies are applicable:

**Policy EN11 Waterspaces states:**

*'Reading's waterspaces will be protected and enhanced, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity, the provision of accessible leisure and recreational opportunities and, where appropriate, navigation. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor'*

**Policy EN12 Biodiversity and the Green network states:**

*'On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should: • Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and • Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable'*

The River Thames is designated in the Local Plan as a Major Landscape Feature under **policy EN13: Major landscape features and areas of outstanding natural beauty**. The policy states that:

*'Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature. The following areas, as shown on the Proposals Map, are defined as Major Landscape Features'*

**Policy EN14: Trees, hedges and woodlands states that:**

*'Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced.'*

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.'

The site is within the AQMA, therefore **Policy EN15 Air Quality** applies which states:

*'Development should have regard to the need to improve air quality and reduce the effects of poor air quality'*

**EN18: Flooding and sustainable drainage systems**

*Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS*

**Policy CR11g, RIVERSIDE** relates specifically to this site, stating:

*Development should maintain and enhance public access along and to the Thames, and should be set back at least ten metres from the top of the bank of the river. Development should continue the high quality route including a green link from the north of the station to the Christchurch Bridge, with potential for an area of open space at the riverside. The main use of the site should be residential, although some small-scale leisure and complementary offices will also be acceptable. Development should take account of mitigation required as a result of a Flood Risk Assessment.*

**SPD Sustainable Design and Construction**

This, amongst other things, reiterates the importance of considering incorporation of brown and green roofs, green walls and natural SUDs.

**Tree Strategy 2010 & 2020**

The site is within a 10% or less canopy cover area and on a designated 'treed corridor' hence tree retention and planting is vital, especially on the frontage and should provide an increase in canopy cover overall on the site. The forthcoming revised Strategy will also expect a net gain in tree number, particularly as the site is in Abbey Ward which has a lower than 12% canopy cover; 12% being the minimum target for all wards by 2030.

The development results in the loss of the locally listed building, which Jon Mullis has provided comment on. The DAS document aims to justify the loss of this mainly as a result of the use of No. 55 for the entrance to the site having a number of cons, including 'No direct pedestrian route or views of Christchurch Bridge'. I note that the current proposal does not successfully provide this anyway. A 'treed avenue' (or more accurately, a route with sporadic tree planting) has been provided but there is no direct visual link from Vastern Road to the river as a result of building layout. I appreciate that the shape of the site does make this more difficult but it would appear that some measures, such as the 'shaving off' of corners of Blocks B & C could assist this. I note the EA comment that *'The corridor leading from Vastern Road to the river should be greener and more biodiverse than is currently shown to benefit people and wildlife'* hence there is work to be done on this route.

When viewed from both Vastern Road and Christchurch Meadows, the proposal presents a large scale of building frontage that is not in scale with adjacent houses or office buildings. The visuals provided within the DAS illustrate how imposing the proposal is from those viewpoints, albeit the design is much improved on the Vastern Road frontage in terms of appearance by omission of the originally proposed upper story building link between Blocks A & B. I note the EA have expressed concern about the height of the buildings and detrimental impact on the river. Whilst an offset has been provided from the river this has only resulted in a 5m buffer strip in front of the buildings which limits meaningful tree planting in terms of large canopy species, which is what should be provided in this location to be in line with objectives of our Tree Strategy (the river being a designated treed corridor) and to enable planting to adequately soften the buildings. The EA's comments emphasise the need to increase the width of this buffer to include the 10m from the river edge and greater space for landscaping which I agree with.

The landscape design principles include the need to consider green walls and roofs. It appears that, with the exception of the café, these are not included on any of the buildings. Even with the café, it is unclear as visuals in the DAS indicate a green roof but the roof plan does not. I note the inclusion of PV on the roof of Block A, D and somewhere on Blocks E, F & G and I acknowledge that these also have a place on developments. However, given our policy backing for green roofs, it would be helpful to have a statement as to why these have been omitted and why green walls are not proposed anywhere. As you are aware, in terms of responding to the Council's climate emergency and global biodiversity loss, maximum greening of every site is vital and is especially important for this site for the reasons mentioned in my attached email & to meet with policy requirements.

I previously indicated (in view of biodiversity and maximum greening) that natural SUDs provision should be the default position and I note that the Landscape GA plan (Rev A) mentions potential 'rain gardens' in one location, that being in front of Block C. However, I note that the plan associated with the submitted drainage strategy shows only cellular storage tanks, which should be the last resort. Tree pits and water storage can be designed together to be mutually inclusive and in turn provide biodiversity benefits. Further thought on this is required in view of Policy EN18 and the Sustainable Design & Construction SPD.

With reference to Landscape Planting Framework Plan 448.LA.102 A, there have been some changes to tree species proposed as a result of comments given at pre-app – I note that the key and plan do not match in terms of tree species included. In relation to the species proposed there are some changes required (EA comments noted on this):

Prunus should be avoided due to over-representation in the Borough, large canopy trees should be considered in front of the café (riverside), the internal Betula nigra should be substituted with a native Birch and instead of the riverside Q.palustris proposed a Q.robur should preferentially be considered if waterlogging is not likely to be a significant issue or a Swamp cypress could be considered as that would complement those planted on the riverside at Thames prom. Whilst the latter would not meet the EA's native requirements, there is sometimes also a place for ornamental planting on development sites. I note the EA's concern about the use of Alder in terms of disease spread and understand that planting Alder on river banks that are liable to flooding and where the disease occurs presents a high risk of the disease spreading. Betula pubescens could be utilised and Populus nigra (native Black poplar) both of which are native and moderately tolerant of waterlogging. The EA's comments on other planting proposals (non-tree) should be taken into account. Detailed landscaping could be secured via condition, but I think it is appropriate given the extent of concerns for amended details to be provided prior to a decision.

The tree pit provision and design will be extremely important on this site to ensure long term successful establishment of tree planting. Given the level changes through the site and the inevitable need for services, demonstration of the provision of suitable underground space (soil volume provision) for tree planting should be provided now. This should include indicative service routes.

Darren Cook and I emphasised the need to ensure that tree planting within the development would not conflict with vehicle movement, particularly larger vehicles (refuse trucks, emergency vehicles, delivery lorries). I couldn't find a vehicle tracking drawing – has one been provided?

The Contents of the Tree Survey and AIA document are acceptable. As is recommended, an Arboricultural Method Statement will need to be secured to ensure appropriate protection of off-site trees.

Whilst the principle of redeveloping the site is supported and there are no existing tree issues that can't be addressed, there are a number of concerns that need further consideration in order for the application to be supported in tree and landscape terms, i.e. to comply with our policies.