

Memo

To: Brian Conlon, Planning

From: Sarah Hanson, Natural Environment Officer, Planning

CC: GS Ecology, Darren Cook (Transport DM), Carolyn Jenkins (Parks)

Date: 27 April 2020

Re: Consultation on an Outline Application

Application No: 200328/OUT

Address: Vastern Court, Vastern Road, Reading (Aviva site)

With reference to the Design & Access Statement dated February 2020 and the Arboricultural Impact Assessment Report 190314-PD-11a dated January 2020, this application is currently not acceptable in tree & landscape terms:

As you are aware, a number of Local Plan policies will be relevant to this site as far and trees & landscaping is concerned and the landscape principles (for this and adjacent sites) were recommended in my email attached, including reference to the RSAF.

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'

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 CR11e, NORTH OF THE STATION relates specifically to this site, stating:

There will be retail and leisure development on the ground floor activating the streets and spaces including the new northern station square, with other uses including residential and offices on upper floors. Retail will have good pedestrian links to, and will not have a detrimental impact on, the rest of the retail core of the centre. Public car parking will be provided. A high quality route incorporating a green link should be provided through to the Thames. Development should take account of mitigation required as a result of a Flood Risk Assessment, and should consider opportunities to open up the culverted Vastern Ditch and enhance it as an ecological feature.

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.

Description of the development

As per the application form:

Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Demolition and redevelopment to comprise: up to 115,000 sqm GEA in one or more land uses comprising: Residential (Class C3 and including PRS); Offices (Use Class B1(a); development in Use Classes A1, A2, A3 (retail), A4 (public house), A5 (take away), C1 (hotel), D1 and D2 (community and leisure); car parking; provision of new plant and renewable energy equipment; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; provision of attenuation infrastructure; engineering operations. All development, works and operations to be in accordance with the approved Development Parameters Schedule and Plans.

The site is subject to TPO 3/06 which includes 7 individual trees on the Vastern Road and Caversham Road frontage. This is disappointingly not mentioned in the DAS and trees have not been identified as a constraint at all within the relevant section of this document. This is not an acceptable approach, particularly where a TPO exists. Whilst an AIA has been carried out, this does not confirm the presence of the TPO either, which is surprising given my pre-app comments and that the TPO is listed on our public Directory.

The TPO reflects the importance of trees on the frontages of these two main routes; Vastern Road being a 'treed corridor' as defined in our adopted Tree Strategy and the site being within a 10% of less canopy cover area/low canopy cover Ward, i.e. tree retention and planting is a priority. As per the comments from Leisure at Pre-App, large canopy tree planting is required, particularly around the perimeter as has been requested on the adjacent site (Royal Mail). Large canopy trees have multiple benefits; on this site softening and screening will be important given the residential properties opposite and pollution filtering on this main route is a necessity given the site's location within the AQMA.

Given the importance of landscaping on this site, it is vital that the outline proposals demonstrate an adequate level and that tree planting and other landscaping can be provided within a viable scheme that meets all other planning and highway constraints. In this respect and whilst detailed landscaping could be left for a reserved matters application, the principles very much need to be secured as part of this outline application. This may mean that layout needs to be considered now as opposed to being left as a reserved matter.

It is also important to clarify any pre-construction works that could take place by virtue of outline consent being given to ensure that retained trees on the site are suitably protected by pre-commencement (all works) conditions. It may also be appropriate to consider that if the outline approval allows demolition, what temporary arrangements should be secured to ensure an empty, visually unattractive site is not left for a long period, e.g. temporary landscaping, site hoarding specifications.

DAS

As mentioned above, the Constraints section does not mention existing trees or the need for an appropriate landscape buffer despite my Pre-App comments. I note that trees and landscaping are not included within the PreApp summary which is surprising.

The document and 'Parameter plan – Building Plots PP 102' confirms the intended separation distance between plots, that being a minimum of 23m between Blocks C & D (main north-south link) and a minimum of 15m between Blocks A & B (wider for the hotel public square) and B & C. It is also confirmed that a 10 wide strip is provided on the south side which appears to be between the southern extent of the plots and the north edge of the east-west vehicular route? In addition, it is indicated that Plots A & B are to be set back to a minimum of 5m from the Vastern Road kerb to allow for highways improvement (cycle and pedestrian route).

In relation to the north-south route between plots C & D, the 23m allows for large canopy trees to be planted, albeit not as a parallel double avenue – the trees would need to be staggered to allow for future canopy growth. I note, however, P.219 Tree Strategy states: *'Trees within the Thames-Kennet Spine will be of a more gardenesque character, using ornamental species and multi-stem varieties to create a more intimate landscape'*. This is not what would be expected down this main route. I note that (page 207) indicates that

the N-S route includes a rain garden – it is not clear how this would be provided and the text is not legible. Natural Suds are encouraged and expected so should be provided here and elsewhere (see later comments).

If the 10m width indicated on the south side is between the building elevations and kerb edge of the east-west route, then that provides a good width for meaningful tree planting.

In relation to the 5m strip on the Vastern Road frontage, this is inadequate for large canopy tree planting. I am also concerned that this landscape strip is outside the site boundary and within Council land on which a cycle and pedestrian route is to be provided. Firstly, a landscape buffer strip should be provided within the site boundary and outside the building footprint. If for whatever reason this is not to be the case (clarification & justification is required) then confirmation is required that tree planting and the highways improvements are mutually inclusive. The DAS (P.212) refers to this boundary (and into Caversham Road) as 'The Urban Edge' which '*will provide a positive setting to the development where it faces the two main roads. It will have a width no smaller than 5m, which will allow for a pedestrian and cycleway alongside soft planting where space allows. Final tree positions will need to be coordinated with existing services that might overlap with the proposed footway. The plan seeks to retain a group of existing, large street trees adjacent to the Site entrance along Caversham Road where possible, enhanced with new planting to create a welcoming edge to the development and retain maturity in the landscape*'. There is too much uncertainty about the tree planting here, hence further clarification is required in relation to highways works, agreement to plant on RBC land and services (the DAS confirms that proposals go beyond the application boundary) in order to commit to adequate tree planting.

The landscape section of the DAS suggests a tree planting palate (ref 7.7 Tree Strategy, P.219). There is no reference to the inclusion of a species link with the adjacent site and 55 Vastern Road, which we indicated would be beneficial. Several of the species should be avoided due to overrepresentation in the Borough (Tilia) and due to overuse in landscape schemes (Betula Jacquemontii). The focus should be on species that are either native or provide wildlife benefit. I note that this section makes no reference to the 'Urban edge' (Caversham & Vastern Rd frontage) so omits suggestions for tree species on the most important part of the site.

In relation to SuDs, P.114 show the Basement Footprint Parameter Plan PP-106 which sets out the areas considered suitable for the location of rainwater attenuation tank requirements (Max 1.5m below ground level). It is unclear how these fit in with a drainage strategy that utilises natural SuDs - P. 85 states that rain gardens and swales will be used, the position of which are indicatively shown on p.204 (blue infrastructure).

In relation to green roofs, P.216 states that '*Where possible the proposed buildings will seek to provide green roofs to encourage biodiversity and local wildlife. These will use a diverse mix of sedums and wildflowers that will provide habitat and food for bees, butterflies, insects and birds*'. Given our policies, SPD and the need to respond to the Council's climate emergency declaration, a definite commitment is required for the provision of these rather than a 'where possible', i.e. 'building design will allow for the provision of green roofs'. It would be helpful to show these on the illustrative LS masterplan, alongside the ground floor and podium soft landscape areas. Green wall provision should also be considered to improve the greening of the site, particularly given the location within the AQMA. Although detailed landscaping is to be agreed at

a later date, a commitment to the inclusion of green walls should be sought as these will need to be factored in the final building design and cost.

Other biodiversity provisions may be required such as bat and bird boxes/bricks and I assume GS ecology have been consulted to give advice.

The DAS confirms the retention of a few trees on the Caversham Road corner – comment on this is given below.

Arb Impact Assessment

The TPO on the site includes 7 individual trees: 1 Plane and 6 Maple; those being T17, T18, T7, T8, T9, T11 & T12 of the tree survey. Four of those are categorised as category 'B' trees, two as category 'C' trees and one (T17) as a category 'A' tree. T16 is also classed as a 'category 'A' tree; the only reason it is not included in the TPO is because it is Council owned.

In relation to tree loss, 5.3 states: *'However, the worse case, based on the maximum building footprint being delivered, would require the loss of 15 trees including 3 B category trees, 10 C category trees and 2 U category trees'*. This would require the removal of 5 of the 7 TPO trees, 3 of which are category 'B' trees, i.e. those which are expected to be retained during redevelopment. Arguably, being on the perimeter of the site, this could have been achieved and would give new development instant softening.

5.5 goes on to say: *'however should trees T8, T9, T11 and T12 need to be removed this will have an impact on the Vastern Road street scene which would be mitigated with new landscaping secured as part of a reserved matters or detailed planning application'*. I would argue that the principle of removing high quality, established trees should be avoided just because new trees can be provided. If this principle were accepted across the Borough, the age range of the tree stock would be negatively affected and we would lose the benefits of established, mature trees.

In relation to retained trees T17 & T18 on Caversham Road, 5.9 states: *'The location of the boundary for Plot A lies along the edge of the existing crown extents and requires consideration for future crown growth. Both London plane and Norway maple species are tolerant of pruning and the form of the trees will allow approximately 1.5m crown reduction of the eastern aspect of the tree canopies to suitable growth points, as such there is no concern raised regarding the maximum western extent of development proposed in Plot A'*. Redevelopment of a site should be taken as an opportunity to give existing, high quality retained trees an improved environment, in this case greater canopy spread space to avoid the need for repeated pruning due to the position of a building. For information, we have recently had to approve minor reduction of the Plane due to its proximity to TGI Friday (app ref (191718)).

It is not clear how T16 will factor into the proposals to allow for access to the east-west route between the site and the adjacent site – this should be clarified.

If approved, as indicated in the AIA, a detailed Arb Method Statement will be required and will have to cover the period from when any works start on site to ensure retained trees are protected during any demolition and enabling works.