

# Memo

**To:** Brian Conlon, Planning

**From:** Sarah Hanson, Natural Environment Officer, Planning

**CC:** Alison Amoah, Planning

**Date:** 25 January 2022

**Re:** Consultation on an Application

Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. A demolition phase and phased redevelopment (each phase being an independent act of development) comprising a flexible mix of the following uses: 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), 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.

Further to my memo of 27/4/20 and revised submissions:

I note that landscaping and layout are still reserved matters (and nothing has changed as it relates to trees or landscaping). My concern over these was highlighted in my previous memo, i.e. submissions need to demonstrate adequate landscaping principles, or for there to be scope within conditions to secure the required level of landscaping, with reference to parameter plans, for it to be acceptable for details to be agreed at a later date. Within the Planning Application Booklet, parameter plan 17043 PP-102 shows:



The beige shading relates to 'Area within which buildings to be located'. For the scheme to be acceptable in relation to existing TPO trees and the provision of an adequate landscape buffer on the Vastern Road frontage, final designs would have to amend this 'area' appropriately, i.e. reduce them. Further to our discussions, I am reasonably satisfied that this could be done by appropriately worded conditions as laid out below, given that the parameter plan does not approve the footprint, i.e. indicate that the beige areas must be the final footprints. **I am aware that approved documents are likely to also include a minimum floorspace hence to address the possibility that this (within the building height restrictions) may not allow sufficient land for other factors, such as landscaping and access, conditions must make it clear that meeting policy requirements and the specific requirements as set out in conditions may override that minimum floorspace.**

For clarity, the landscape principles presented thus far are not acceptable hence it is not appropriate to refer to them. Taking into account the distances shown on the above parameters plan and the maximum building area only, sufficient landscaping could be provided subject to future developers meeting the requirements of the conditions, which in places are specific given the lack of details provided thus far.

#### Condition justification

In the first instance, it may be helpful to reiterate the requirements, as they relate to trees and landscaping, on this site so that the applicant can see clear justifications for the conditions. In addition, it may be helpful to point out the lack of commitment in applications submissions that lead to the requirement for prescriptive condition wording.

#### **NPPF 2021**

*131. Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined 50 , that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.*

#### **The National Model Design Code (July 2021)**

Relevant guidance within its 'Nature' section (within Part 2 Guidance Notes):

N.3.iii Street Trees, Point 27 'Position' states:

*'Careful positioning to allow space for the mature tree without causing obstruction or interfering with property, infrastructure, street lighting or junction sightlines'...*

N.3.iii Street Trees, Point 27 'Function' states:

*'Ensure street trees and green infrastructure provide for a range of functions and benefits...'*

## **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.'*

## **EN15: Air Quality**

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

4.2.78 & 4.2.79 explain the Air Quality Management Area (AQMA) within which the Vastern Road site sits.

Supporting text in 4.2.80 states *'...Other mitigation measures may also include travel plans, restrictions in car access or parking, planting, green walls or certain types of paving that absorb NO2...'*

## **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*

## **CC7: DESIGN AND THE PUBLIC REALM** (relevant parts highlighted)

*All development must be of high design quality that maintains and **enhances the character and appearance of the area of Reading in which it is located.** The various components of development form, including: -*

- Layout: urban structure and urban grain;*
- **Landscape;***
- Density and mix;*

- *Scale: height and massing; and*
- *Architectural detail and materials will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives: -*
  - *Character - a place with its own identity and sense of place*
- *Continuity and enclosure*
- ***Quality of the public realm and provision of green infrastructure and landscaping***
- *Ease of movement and permeability*
- *Legibility - clear image and easy to understand*
- *Adaptability – capable of adaptation over time*
- *Diversity – meets a wide range of needs.*

*Developments will also be assessed to ensure that they: -*

- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and **providing value to the public realm;***
- *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
- *Address the needs of all in society and are accessible, usable and easy to understand by them, including providing suitable access to, into and within, its facilities, for all potential users, including disabled people, so that they can use them safely and easily;*
- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and **appropriate materials and landscaping.***

*Applications for major developments, or other relevant developments, should be accompanied by a design and access statement that deals with all the above matters.*

### **CR3: PUBLIC REALM IN CENTRAL READING** (relevant parts cited)

*Proposals for new development will need to make a positive contribution towards the quality of the public realm of the central area and will be assessed against the following criteria:*

- All proposals on sites of more than 1 hectare within the central Reading boundary will need to provide new public open space or civic squares integrated with surrounding development. Smaller developments will contribute towards improvements to the public realm;*
- Imaginative uses of open space and the public realm, which contribute to the offer of the centre, will be encouraged, and new open spaces should be of a size and shape to be flexible enough to accommodate such uses. The provision of water features, trees (including street trees) and other planting, as well as hard landscaping, to create high quality spaces, will be expected, where appropriate;*

## **CR11: STATION/RIVER MAJOR OPPORTUNITY AREA** (relevant part cited)

*Development in the Station/River Major Opportunity Area will:*

*v) Provide additional areas of open space where possible, with green infrastructure, including a direct landscaped link between the station and the River Thames;*

**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 refers to the use of large canopy trees in 5.4 where, in listing the benefits of trees, states:

*'The preference will be to, where possible, use large canopy species that provide more benefits for climate adaptation'*

The SPD also reiterates the importance of considering the incorporation of brown and green roofs, green walls and natural SuDs.

### **Tree Strategy**

The site is within a low canopy cover Ward, on a designated 'treed corridor' and within the AQMA, hence in a priority area for tree retention and planting, which is vital, especially on the frontage and should provide an increase in canopy cover overall on the site.

It is relevant to note that as recently as the 1970s Vastern Road was a tree lined road on both sides; some remnant Plane trees still existing on the north side. Tree Planting on the Vastern Road frontage would re-establish this lost double-sided avenue on this main route.

### **Reading Station Area Framework (RSAF)**

This states (in relation to Vastern Road) that '*Potential changes to Vastern Road could reduce the dominance of speeding traffic and transform the character of the road from a by-pass at the edge of the town centre into a tree lined avenue as a central element of the town centre public realm, by planting in the central reservation and creating planted verges*'.

5.22 states (in relation to Landscaping) that '*There should be new tree planting along Vastern Road, for instance, including the central reservation. Landscaping may also incorporate green roofs, living walls and sustainable drainage systems (see Chapter 10). The biodiversity value of landscaping is particularly significant where the elements of landscaping form green corridors that connect with existing open spaces, waterspaces and areas of biodiversity significance*'.

Chapter 8 (Urban Design Framework) refers to '*Promoting high quality buildings, streets and spaces; Creating permeable development that strengthens north-south links and improves connectivity across the area; Integrating public spaces and active frontages to establish vibrant, safe and enjoyable areas and create a focus to the sites*'. Figure 8.2 provides guidance on where the major & minor paths and public spaces should be with figure 8.3 indicatively shows landscaping within the desired framework, which includes tree planting on the Vastern Road frontage.

10.8 (within the Sustainability chapter) states that '*Green roofs should be considered for all developments with flat roofs in the Station Area*'

10.11 (Living walls) states: '*High quality designs for 'green walls' incorporating vegetation over a majority of a building's vertical surfaces should be considered, particularly where living roofs are difficult to achieve*'

It should be noted that whilst the RSAF is a live and current document, it was adopted 12 years ago in 2010. Since then, Reading BC has adopted a new Local Plan, has declared a climate emergency and we have a revised Reading Climate Change Action Plan, Tree Strategy and Biodiversity Action Plan (BAP). Hence these more current policies / documents / requirements must be used to guide the principles within the RSAF.

Given the above, landscaping will be an integral part of this site to provide the 'in principle' features indicated in the RSAF and to meet local plan policies and the aims of our Tree Strategy (along with the BAP, Reading Climate Change Action Plan, to respond to Reading climate emergency and aim for a carbon zero Reading by 2030). In addition, there should be a landscaping link with adjacent sites through use of species. Whilst a complete repeat of species from one site to the next should be avoided in order to improve species diversity, a selection of a few common species between sites is desirable to provide a link.

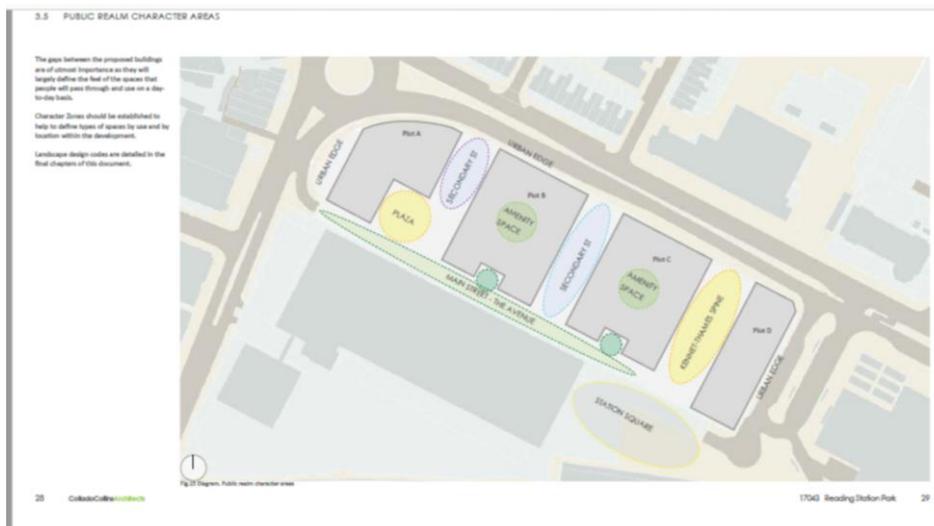
Principles (as advised at an early stage) should include:

- Retention of good quality established trees where feasible
- A net gain in tree number across the sites – preferably 3 for 1
- Species link through the sites (each applicant will have to be aware what the other is proposing – given the advance stage of the Royal Mail site, SSE have used those species proposed to guide their own planting palette)
- Species selection to respond to the microclimate, e.g. shady areas, windy locations, polluted frontages
- Species selection as way-finding
- Species selective to provide diversity (including avoiding over-represented species in the Borough, e.g. Prunus and Tilia)
- Species selection to provide wildlife value
- Creation of 'avenue' planting, particularly along the north-south route which should aim for a double row (potentially staggered).
- Use of large canopy species

- Perimeter planting along the Vastern Road and Caversham Road frontages
- Defensive planting to respond to secure design concerns
- High quality tree pits, including use of root cells to provide sufficient rooting volumes within hard landscape areas
- Use of green walls and roofs

With reference to the Design Code, September 2021

The public realm character areas are shown in 3.5 as:



6.1.1 (Kennet-Thames Spine) states that as a mandatory requirement, 'A *minimum 5m wide of hard surfacing running north to south to provide a wide and welcoming route with ample capacity for future pedestrian numbers passing through*' and as a discretionary requirement 'Could provide a 10m wide 'place' zone to accommodate lawns, planting, trees and open space for people enjoying a pause'. The accompanying drawing shows a 10m landscape zone plus two 5m pedestrian zones (totalling 20m). This is not consistent with the parameter plans which, rightly, show this import north-south link to be minimum of 23m in width (building to building; plot C-Plot D) hence this minimum width should be stated as a mandatory requirement.

6.1.2 (The Avenue / main street) states within the mandatory requirements that 'The junction with Caversham Road must consider the possibility of retention of existing trees to create a green and inviting entrance to the development to encourage pedestrian and cycle through route'. This an absolute requirement as established, high amenity Council and TPO trees should be considered as a constraint. Relevant comments on the AIA were given in my memo of 27/04/20 which were:

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.

6.1.3 (Secondary Street) includes as a mandatory requirement *'The eastern street must incorporate a minimum 2m wide pedestrian route to encourage easy pedestrian movements'*, the accompanying drawing indicating a total width of 14m for West street and total of 19m for East Street. Neither is consistent with the Parameter plans which show both as a minimum 20m width hence this minimum width should be stated as the mandatory requirement.

6.1.4 (Urban Edge / Vastern Rd frontage) includes the following as a mandatory requirement:

- *The development will seek to retain existing trees along Caversham Road of high value where possible.*
- *Street tree planting must be considered where this is possible to provide*

And as discretionary requirements includes:

- *Mature tree specimens could be provided to mitigate any losses from site enabling development. Large species where possible.*
- *Areas of planting to provided where the width of the footway permits without hindering pedestrian and cycle movement*

In relation to the mandatory requirements, there is no evidence in submissions to indicate that existing, protected trees have been considered at all and the terminology 'will seek to' does not commit. Similarly, Street tree planting is an absolute requirement hence the use

of the term 'where possible' is very non-committal. The reference to 'large species' is non-specific in that it does not define these. From submissions and visuals provided, it appears that the applicant has taken 'large species' to be 'tall but narrow' species. This main frontage should include 'large canopy species' and importantly allow sufficient space for these without creating future conflict, hence without this commitment, condition wording needs to allow provision for these. As mentioned above (under Tree Strategy) it is relevant to note that as recently as the 1970s Vastern Road was a tree lined road on both sides, some remnant Plane trees still existing on the north side. Tree Planting on the Vastern Road frontage would re-establish this lost double-sided avenue on this main route. Lastly, planting along the frontage is a must hence should be provided alongside footway and cycleway requirement, not where it's possible after deciding on the pedestrian and cycle provision.

6.1.5 (Pocket Squares and Podiums) includes only as a discretionary requirement: '*Appropriate tree planting to add a sense of scale to the podium garden where possible*'. This offers no commitment to tree planting, which should be seen as a mandatory requirement.

6.1.6 (Green roofs) states only as a discretionary requirement that '*The Site will seek, where possible, to provide green roofs*'. This offers no commitment to an element of green provision supported by policy requirement and that of other adopted documents, as detailed above. I note that is no mention of green walls or brown roofs.

Section 6.1 does not mention the integration of landscaping and SUDs as is a consideration requirement of Policy EN18, as detailed above.

### Conditions

The above comments are aimed at demonstrating justification for the following given the vague and non-committal nature of this outline application.

Conditions need to deal firstly with an overall landscape strategy prior to development of any phase and thereafter detailed landscaping for each phase. Reference to, and consistency with, adjacent development is appropriate. As such, I would suggest the following:

- Prior to the submission of a reserved matters application for any phase of the development, an overarching landscape strategy, including a Landscape Master Plan, for the whole site shall be submitted and approved in writing by the Local Planning Authority. The landscape strategy shall be accordance with adopted Local Plan Policies and other relevant adopted documents current at the time of submission, shall demonstrate consistency with adjacent developments and on the Vastern Road frontage shall provide a set back from the kerb of a minimum of 10m and provide a coordinated approach with planned or existing planting on the adjacent Highway land. Details shall include landscape principles, including provision of large canopy trees, links with retained landscape features, tree rooting volume provision, landscape-led SUDS, management responsibility division and an expectation for the inclusion of green or brown roofs and green walls; indicative service routes; location of hard landscaping, street furniture, lighting locations and how soft & hard landscaping features will support the finding of the approved daylight, sunlight and microclimate assessments.

Development shall be carried out in accordance with the approved strategy unless otherwise agreed in writing by the Local Planning Authority.

Reason: to ensure that Landscape Principles meet with current policy and adopted document requirements. (currently NPPF, The National Model Design Code (July 2021), EN12, EN14, EN15, EN18, CR3, CC7, SPD Sustainable Design and Construction, Reading Station Area Framework and adopted Tree Strategy)

Following the above, the standard landscape condition would be appropriate but with the initial wording changed such that it relates to the phased approach for this site and reference is made to the above strategy, i.e:

No development shall commence on each phase/plot until a comprehensive scheme of hard and soft landscaping for that phase/plot has been submitted to and approved in writing by the Local Planning Authority. Details shall be in accordance with the approved Landscape Strategy and shall include:

- a. Proposed finished ground and floor levels or contours, means of enclosure (including mammal gaps where appropriate), car parking layouts, other vehicle and pedestrian access and circulation areas;
- b. Hard surfacing materials and minor artefacts and other ancillary structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting, external services, etc);
- c. Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), tree pit specifications, schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable;
- d. A maintenance programme detailing all operations to be carried out in order to allow successful establishment of planting;
- e. routes and details of proposed and existing functional services above and below ground including foul and surface water drainage, soakaways and SUDs details, power, communications cables and water and gas supply pipelines, including access points;

The approved hard and soft landscaping scheme shall be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a timetable approved in writing by the Local Planning Authority.

Any trees or plants which, within a period of 5 years from the date of planting, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, to be agreed in writing by the Local Planning Authority.

REASON: These details are required prior to commencement of development because of insufficient information contained within this submission and in the interest of ensuring that the landscaping of the development enhances the visual local environment and in accordance with the NPPF, The National Model Design

Code (July 2021), Policies EN12, EN14, EN15, EN18, CR3 & CC7 of the Reading Borough Local Plan 2019 , SPD Sustainable Design and Construction, Reading Station Area Framework, adopted Tree Strategy and adopted Biodiversity Action Plan.

A Landscape Management Plan will need to be secured and will be required at the relevant stage and I would suggest that this could be a 'prior to occupation' condition and would follow approval of the detailed landscaping at a later date, however you will note principles included in the overarching landscape condition above:

- Prior to the occupation of each phase/plot a long-term landscape management plan, in accordance with the approved overarching Landscape Strategy and approved detailed landscaping for that phase/plot and including long term design objectives, management responsibilities, timescales and maintenance schedules for all landscape areas, other than privately owned, domestic gardens, shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall thereafter be carried out in accordance with the approved details and for the period specified.

REASON: In order to ensure that provision is made to allow satisfactory maintenance of the landscaping hereby approved in accordance with EN12, EN14, EN15, EN18, CR3 & CC7 of the Reading Borough Local Plan 2019 , SPD Sustainable Design and Construction, Reading Station Area Framework, adopted Tree Strategy and adopted Biodiversity Action Plan.

As mentioned in my memo of 27/04/20, trees have effectively been dismissed in submissions and I raised concerns over the loss of existing TPO trees and the impact on those shown to be retained. Extracts from the AIA are given above. Given the vagueness of the outline application under consideration and that final footprints and designs are far from being known, a further Arb Impact Assessment will be required and for the final development to demonstrate its acceptability, which would have to include an appropriate footprint. I suggest the following condition – in this case, just an overarching condition as latter detailed phase by phase Arb Method Statements may not be required, depending on the final designs and retained trees hence it would not be appropriate to attach an AMS requirement now:

- Prior to the submission of a reserved matters application for any phase of the development, an up-to-date Arboricultural Impact Assessment shall be submitted in writing to the Local Planning Authority. This Assessment will inform the Arboricultural Method Statement for each phase, as applicable.

Reason: to ensure the retention and protection of high amenity value, TPO trees in accordance with current Local Plan Policies and relevant adopted documents (currently EN14 & Tree Strategy).

The above assumes that on approval of a Reserved Matters application, a condition can be attached for an Arb Method Statement if applicable.

I assume there will also be conditions relating to biodiversity enhancements, boundary treatments, lighting and a CMS and that these will be appropriately worded to deal with a phased development.

