

Planning consultation re 200328: 80 Caversham Road and Vastern Court

As internal consultees on issues relating to the public realm, we wish to express our dismay at the proposals submitted under 200328. The development is essentially a series of tower blocks separated by wind tunnels. This is a high-profile site on a major transport route, facing the road which acts as the main gateway to Reading from the north. The design of road frontage is critical to the long-term perception of Reading as a green city with high-quality open spaces that make it a pleasant, culturally active and healthy place in which to live and work, and to visit.

From a national perspective, paragraph 98 of the NPPF (Open Space and Recreation) stresses the importance of high-quality open spaces for the health and well-being of new communities. At a local level, the Council's Corporate Plan adds texture to this requirement, seeking to make the town a place for thriving communities in a healthy environment and inclusive economy.

Specifically, in terms of our remit, it does not satisfy the following policies:

Open Space

Policy EN9: PROVISION OF OPEN SPACE requires that all new development makes provision for appropriate open space based on the needs of the development. Specifically, on sites of 50 dwellings or more, or for developments where the availability and quality of existing open space has been identified as deficient, new on-site provision will be sought. We appreciate that the nature of any open space requirements will be dictated to some extent by the location of the development. Town centre developments may allow for on-site civic public open space. However, all development must ensure satisfactory provision of children's play areas and neighbourhood parks for the new residents, making an off-site contribution to for this where on-site provision is either not possible or not suitable.

As approximately 1,000 new residential units are planned for this development, the Council's Open Space Strategy envisages the provision of 1 to 2 hectare local park with sports facilities to serve this new community. The Council's Planning Obligations SPD, derived from the Open Spaces Strategy, requires that open spaces planning obligations will require the following main elements:

- In areas deficient in recreational open space, the provision of appropriate (defined below) new public open space, with a commuted sum to ensure funding for future maintenance to a high standard
- In areas with an adequate quantity of public open space, a financial contribution to improving existing open space to cater for additional use

New public open space must be:

- A minimum of 0.2 ha where the provision of a new neighbourhood park is required; in the case of very large developments, the provision of a new local park (minimum area of 1.0-2.0 ha) should be required
- Integrated, not overly fragmented, open space (in terms of both area and topography)
- Linked to adjacent local communities (not buried within the new development)
- Accessible to the general public and to people of all capabilities
- Not severed by roads
- At least in part, informal landscaping for both aesthetic and recreational purposes
- Appropriate, in that it satisfies the most urgent local need, whether formal play provision for children; youth facilities; sports grounds; green links; or informal landscaping

There is some flexibility in both the SPD and the Local Plan which allows that the provision of open space for all developments should satisfy the most urgent need subject to considerations of particular deficiencies. Given that the Local Plan is not prescriptive as to what any particular development must provide in respect of open spaces, this requirement would be informed by a detailed Open Space Statement (OSS), which is required for new residential developments of 10 or more dwellings. The assessment in the DAS provided for application 200328 considers what open space nearby serves the development, but it does not adequately consider the provision of new public open space on site. Given that this is an opportunity to provide a new urban park, with grass and trees, preferably contiguous with the Reading Station forecourt, it is our view that this opportunity has been lost through omission. In other words, we would expect the area bounded by Reading Station, Trooper Potts Way and Vastern Road to be set aside as landscaped public open space. The current provision of the Kennet-Thames Spine for cyclists and pedestrians is simply inadequate for a development of this size.

If the new on-site urban park does not meet all of the Council's requirements, particularly for sports and recreational use, then there will be an expectation that off-site contributions will be made towards improvements to nearby Christchurch Meadows and the adjacent Thames Parks. These open spaces are currently well used but investment is required to increase capacity, given the amount of new development coming forward within the immediate area, in order to address the overall impact of this development on public infrastructure and to make the scheme acceptable in Planning terms.

The on-site leisure facilities provided in the proposals contravene all of the requirements of size, integration, connectivity and accessibility set out above; they are effectively 'defended' against use by non-residents of the development by being inaccessible to outsiders. Given the aspiration for a new landscaped park on the site, we suggest that these on-site spaces be considered simply private landscaping or facilities for the development, and that a separate S.106 legal agreement be negotiated to include an off-site contribution of up to £2,500/unit to provide for public leisure facilities for people of all ages groups. A portion of this may be offset by a new, appropriately sized urban park on site.

Equally, the purpose of open space and access routes needs to be clear. For example, 'The Avenue' is the service entrance route; according to the DAS it allows access 'to building services, deliveries, emergency access and access to car parking'. To double this up as the main route for cyclists and pedestrians and to offer it as public open space is unacceptable.

Tree Planting

Policy EN12 Biodiversity and the Green network states that '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.'

More detail is provided in the Council's Tree Strategy. The site is within a 10% or less canopy cover area and on a designated 'treed corridor'. Tree retention and planting is essential, especially on the

main road frontage, and should contribute in a significant way to an increase in canopy cover not just on the site but in that part of Reading, if there is to be any hope of achieving the minimum target of 12% cover in all wards by 2030.

Canopy size is also important. This is recognised in the DAS, where the text for the 'Urban Edge' promises large canopied trees. However, the varieties offered in the tree palette at the end are all small to medium sized, with the comparatively small *Tilia cordata* 'Greenspire' being the largest variety on offer. We would be looking for Vastern Road to be a 'treed corridor' as required by the Tree Strategy, with buildings set back from the road and large canopied trees like London planes along the roadway. This would link visually with the plane trees along Caversham Road and around Great Brighams Mead.