



READING BOROUGH COUNCIL
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SECTION 78 APPEALS

SUMMARY OF PROOF OF EVIDENCE ON REASON FOR REFUSAL No. 10
(open space)

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Appeal by: Aviva

Site: Vastern Court, Vastern Road, Reading

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.

Planning Inspectorate Reference: APP/E0345/W/21/3289748

Reading Borough Council Reference. 200328/OUT

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1.0 INTRODUCTION

- 1.1 This Proof of Evidence (PoE) has been prepared by Dr Carolyn Jenkins, Chartered Member of the Landscape Institute and Assistant Streetscene Manager at Reading Borough Council. My academic qualifications include an Honours degree in Landscape Management.
- 1.2 Since joining RBC in 2003, I have provided professional input for planning applications on both open space and landscape matters. Although based in the Parks Department at RBC, I wrote the background paper to the Local Development Framework and the original Open Spaces Strategy in 2006. Over the past 15 years, I have provided input on a wide range of planning proposals and planning appeals.
- 1.3 I have provided advice to the planning department on proposals at Vastern Court since 2019, including the application subject to this appeal, and I am familiar with the appeal site and surrounding area, along with local planning policy background and other adopted Council documents relating to the natural environment.

2.0 BACKGROUND AND SCOPE OF EVIDENCE

- 2.1 The current appeal relates to the non-determination by Reading Borough Council (RBC) for the following development at Vastern Court, Vastern Road, Reading, planning application reference 200328/OUT:

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.

- 2.2 Following the lodging of the appeal, the application was considered at Planning Applications Committee on 15 February 2022 where members agreed that the application would have been refused and agreed with the 12 reasons for refusal recommended by officers. Of relevance to this Statement of Case is reason for refusal No. 10 (RfR10), which states:

The proposed development fails to provide appropriate, well-designed public spaces of a flexible size and shape due to the location and alignment of development plots related to the Station Square North and the area of open space at the western end of the east-west link, and as a result fails to demonstrate that it is part of a comprehensive approach to its sub-area which contributes towards the provision of policy requirements for open space that benefit the whole area, contrary to policies CR2 b, CR3 ii, CR11 viii of the Reading Borough Local Plan (2019) and the adopted Reading Borough Supplementary Planning Document Reading Station Area Framework (2010).

- 2.3 This Proof of Evidence (PoE) builds on my Statement of Case (CD 10.2.13) to demonstrate the need for flexible and well-designed public open spaces, the appellant's failure to provide the space required, and the resulting future issues.

3.0 THE SITE AND SURROUNDINGS

- 3.1 The appeal site is an important gateway site at the north entrance to Reading Railway Station. It is also a high-profile site on a major transport route, facing the IDR on Vastern Road and Caversham Road which acts as the main road gateway to Reading from the north. The Kennet-Thames Spine is one of the public realm priorities defined in the Reading Station Area Framework (RSAF, CD7.1), set out in further detail below, and its design and legibility as it crosses Vastern Road 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.
- 3.2 The site is a town centre location, covered by the RSAF, which prioritises open space provision and the extension of the public realm within redevelopments in the station area. A guiding principle of the RSAF is the creation of a ‘well connected and accessible place’ (Chapter 03 Principles) where the redevelopment of large sites ‘*provides the opportunity to secure landscaped public space and to extend public access*’ (para.3.6). The RSAF defines ten public realm priorities (para.5.6 and fig. 5.1), three of which relate to the Appeal Site: Station Square North, the Kennet-Thames Spine, and Vastern Road.
- 3.3 One of the main issues (identified by the Open Spaces Strategy (CD7.10), and highlighted in paragraph 4.2.36 of the Local Plan) is that “*in Central Reading, public open space is, by and large, where residents are not*”. This highlights the importance of providing on-site open space in the town centre wherever possible. It is also noted that “*Severance lines, such as busy roads or railways, further restrict residents’ access to open space*”. In this context, the presence of Vastern Road to the north and the railway line to the south of the appeal site are important, making on-site public open space even more essential.

3.4 All of the above mean that the on-site provision of appropriate, well-designed public spaces, coherently integrated into neighbouring sites is important at this location.

4.0 POLICY CONSIDERATIONS

4.1 National Policy

4.1.1 From a national perspective, paragraph 98 of the NPPF (Open Space and Recreation) (CD7.36) stresses the importance of high-quality open spaces for the health and well-being of new communities.

4.2 Local Policy

Local Plan (including detail from the Open Spaces Strategy)

4.2.1 Relevant planning policy is clear that on-site provision of open space is expected in this case. This is set out in particular in policies EN9, CR2, CR3 and CR11 in the Reading Borough Local Plan (RBLP, adopted 2019, CD4.1). Policies CR2, CR3 and CR11 are specific to the town centre, whilst EN9 applies across Reading. The Reading Station Area Framework (adopted 2010) and Planning Obligations under Section 106 Supplementary Planning Document (adopted April 2015, CD7.6) are also important.

4.2.2 **Policy EN9** (Provision of Open Space, CD4.18) of the Local Plan relates to open space requirements across the whole Borough. It sets out the principle that, *“All new development should make provision for appropriate open space based on the needs of the development”*. Whilst it sets out different methods of making provision including both on-site and off-site contributions, the following paragraph makes it clear that there is an expectation that a residential development of this scale will provide new open space:

“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 provision will be sought. Development must ensure satisfactory provision of children’s play areas and neighbourhood parks.”

- 4.2.3 The policy identifies that the most urgent need should be satisfied, and that the Open Spaces Strategy (OSS) should guide the provision, type, and size. The criteria also include that new open spaces should, *“Be accessible to the general public and be designed so as to feel that it is part of the public and not private realm”*.
- 4.2.4 One of the main issues identified by the OSS, and which is highlighted in paragraph 4.2.36 of the Local Plan, is that, *“in Central Reading, public open space is, by and large, where residents are not”*. This highlights the importance of on-site open space on sites in Central Readings. It is also noted that, *“Severance lines, such as busy roads or railways, further restrict residents’ access to open space”*. In this context, the presence of Vastern Road to the north and the railway line to the south are important.
- 4.2.5 Figure 4.3 of the Local Plan - ‘Hierarchy and typology of open spaces of recreational value, and provision standards for Reading’, identifies more detail of expectations in terms of the hierarchy of different forms and sizes of open space that should be available within a certain distance of homes: and paragraph 4.2.37 of the supporting text to EN9 states that this should be used as a benchmark for provision.
- 4.2.6 Another element from the OSS highlighted within the text of the Local Plan itself (paragraph 4.2.39) is around the importance of play space in close proximity to residential, particularly for flatted development.

“The Open Spaces Strategy states that, ‘All guidelines recommend that at least some open space for children to play, whether publicly or privately owned, be available within 100-200m of every home. This will primarily affect very high-density developments, like flats, as almost all other houses have some form of garden’.”

- 4.2.7 The OSS (produced in 2007) does not have any formally adopted planning status in itself, but it is given significance by being explicitly highlighted in Policy EN9. One of its objectives in section 7.2 is, *“To deliver safe, pleasant and popular urban civic spaces”*. This is further highlighted in sections 7.7.1

and 7.7.7 where it states that, *“In larger scale commercial/retail developments, the integration of additional public spaces such as civic squares should be required”*.

4.2.8 Section 7.7.7 of the OSS gives further guidance on town centre spaces:

“Town centre spaces are an essential component of commercial regeneration and for attracting visitors to Reading. In the town centre, the creation of a coherent series of public-space experiences would supplement recent improvements in the town centre, establishing appealing ‘gateways’, improving first impressions of Reading for thousands of visitors, promoting the regeneration of these commercial zones, and generating income.”

4.2.9 This site is certainly an important gateway to Reading, being immediately to the north of the Northern Station entrance.

4.2.10 The Open Spaces Strategy was published in 2007, and is now therefore some 15 years old. In view of this fact, an Update Note was produced in 2018 (CD7.11) for the purposes of Local Plan preparation that assessed the degree to which its conclusions remained valid when considered against changes on the ground or in other policy (for example, the NPPF). It came to the conclusion that, *“it is considered that the overall strategy that was set out by the OSS is still generally valid. This includes the hierarchy of open space provision standards”*.

4.2.11 Policy CR2 (Design in Central Reading, CD4.47) states in criterion b that:

“Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscaped areas, and public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;”

4.2.12 Policy CR3 (Public Realm in Central Reading, CD4.48) is more specific about which developments need to provide on-site open space. Criterion i states that:

“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;”

4.2.13 The appeal site measures around 1.77 hectares, and therefore triggers the requirement for new public open space or civic squares.

4.2.14 Criterion ii of policy CR3 provides further policy on the form of the open space provision:

“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;”

4.2.15 Paragraph 5.3.11 of the supporting text provides further guidance, stating that:

“Additional open space or generous public realm such as town squares or wider streets that can have multiple functions would assist in creating a sense of place in the centre, and are encouraged. Indeed, these types of space are likely to present the main opportunities for additional spaces in the centre. These can act as locations for leisure activities and public gatherings and events. The provision of new public open space should be accessible and of a usable size and shape. It should be capable of use for a range of activities, across a range of age groups.”

4.2.16 Policy CR11 (Station/River Major Opportunity Area, CD4.56) is the policy that specifically identifies this site, together with a number of other nearby sites, for development. Criterion v of the policy states that development will:

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

4.2.17 The policy also outlines the importance of sites within the same sub-area being developed in a comprehensive manner, which is of relevance here where there is more than one development proposal within the CR11e sub-area. Criterion viii states that development will:

“Demonstrate that it is part of a comprehensive approach to its sub-area, which does not prevent neighbouring sites from fulfilling the aspirations of this policy, and which contributes towards the provision of policy requirements that benefit the whole area, such as open space;”

Reading Station Area Framework

4.2.18 The **Reading Station Area Framework** (RSAF, CD7.1) is a Supplementary Planning Document (SPD) adopted in 2010. Paragraph 5.4.9 of the RBLP confirms that this document continues to apply in this area.

4.2.19 The RSAF identifies ten public realm priorities in paragraph 5.6. The priorities of particular relevance to the open space provision on this site are the Station Square North and the Kennet-Thames Spine, as well as the pedestrian grid generally.

4.2.20 Paragraph 5.7 highlights the need for the Station Squares North and South to provide high-quality, multi-functional town squares, thus again referring back to the need for flexible spaces to accommodate a variety of events and uses. It should be noted that the application at 80 Caversham Road, immediately to the south of the Appeal Site, and part of the same CR11 RBLP allocation, and for which there is now a resolution to grant, includes a reconfigured Station Square, which *“seeks to provide an enhanced public space at the entrance to the Station and the site”* (Para. 11 of the Committee Report - CD7.57).

4.2.21 Figure 8.2 of the RSAF sets out the broad urban design structure, and identifies a number of locations for a *“public space/square, important intersection and point of orientation”*. This includes identification of the Station Square North, but also includes important spaces or locations at the Vastern Road/Caversham Road roundabout, the point at which the Kennet-Thames Spine crosses Vastern Road and the point at which the east-west link along the southern boundary of the site meets Caversham Road.

4.2.22 Paragraph 8.21 identifies the Royal Mail and Vastern Road Retail Park and Station Car Park site as one of seven key opportunities for delivery of the framework objectives, with one of the key reasons for the selection being that, *“they are the locations for the principal public open spaces and links in the framework”*.

4.2.23 Paragraph 9.13 identifies that around 4 hectares shall be laid out as streets, squares, open spaces and footpaths. Paragraph 9.14 states that:

“The Council expects these to be taken into account in development proposals and will seek contributions from developers to assist in implementing new spaces, major improvements to existing open spaces and/or better links to them.”

4.2.24 It is therefore clear that policy consistently seeks open space provision on site. Within the town centre there is a particular emphasis on provision of civic squares, and also a strong focus on providing on-site open space and public realm that is flexible to accommodate a variety of events and uses.

4.3 Other Guidance

4.3.1 Guidance is available to provide information on the size and equipping of recreational open space. The Fields in Trust (FiT) guidelines, first published in the 1930s, are based on a broad recommendation that 6 acres (2.4 hectares) of accessible green space per 1000 head of population enables residents of all ages to participate in sport and play (‘The Six Acre Standard’). These were updated to the ‘Planning and Design for Outdoor Sport and Play’ (PDOSP) in 2008. The FiT guidelines, particularly in respect of children’s playgrounds are generally accepted as a national standard; a survey in 2014 found that 75% of local authorities use the PDOSP or guidance that promotes equivalent levels of provision demonstrating the continuing relevance of FiT Benchmark Guidelines.

4.3.2 The latest revised FiT guidelines of 2015 (set out within CD7.54, 2020) provide new recommendations for accessibility, advising a minimum of 0.25 hectares

of play space per 1,000 people, which includes the provision of local areas of play within 100m (or less than one minutes' walk from every home) and equipped local and neighbourhood areas of play at between 5 and 12 minutes' walk (400m to 1,000m) from every home. The distances are less relevant than walking times, because it needs to be recognised, when applying these benchmarks, that local obstacles to pedestrian and cycle movement should be taken into account. There are also guidelines for minimum areas for sport and other activities, which could be provided through an off-site S.106 contribution towards enhancing facilities at Christchurch Meadows (on the north side of the Thames).

- 4.4 The details set out above make it clear that policy consistently seeks open space provision on site. Within the town centre there is a particular emphasis on provision of civic squares, and also a strong focus on providing on-site open space that is flexible to accommodate a variety of events and uses.

5.0 REASON FOR REFUSAL 10 (RFR10)

5.1 RfR10 states:

The proposed development fails to provide appropriate, well-designed public spaces of a flexible size and shape due to the location and alignment of development plots related to the Station Square North and the area of open space at the western end of the east-west link, and as a result fails to demonstrate that it is part of a comprehensive approach to its sub-area which contributes towards the provision of policy requirements for open space that benefit the whole area, contrary to policies CR2 b, CR3 ii, CR11 viii of the Reading Borough Local Plan (2019) and the adopted Reading Borough Supplementary Planning Document Reading Station Area Framework (2010).

5.2 The requirement for well-designed, adequate and appropriate public open space is clear in all policy documents. All new development should make provision for appropriate open space based on the needs of the development. In the town centre in particular, new developments should include spaces that provide suitable functions and interest, a sense of place and safe and convenient linkages to adjoining areas. In particular, all proposals on sites of more than 1 hectare within the central Reading boundary need to provide new public open space integrated with surrounding development, flexible in function and evidencing high quality landscape design. The direct landscaped link between the station and the River Thames (The Thames-Kennet Spine) is particularly important.

5.3 The provision of on-site open space on a site of this scale is expected. The developer is required by the Council's policies to integrate and consolidate any development on this site and any additional open space provision around the planned North Station Square.

5.4 The following are the main concerns that form part of RfR10:

- a. transition between north-south spine and Station Square North;
- b. relationship of Plot D with east-west avenue;
- c. extension of Plot D over part of square from second floor upwards; and
- d. adequacy of pocket park along east-west avenue.

a. transition between north-south spine and Station Square North

5.5 The North-South spine travels between proposed Plots C and D opening into Station Square North. The RSAF illustrative proposals (figure 14.1) shows an ‘hourglass’ shape with the north-south spine widening as it approaches Vastern Road to the north and the station square to the south. In this way the north-south spine contributes to a more expansive station square and a more open character towards Vastern Road. This accords with LP Policy CR3i and ii which requires civic squares to be integrated with surrounding development, promotes the imaginative uses of such spaces, and requires them to be a size and shape to be flexible enough to accommodate their desired uses. In the proposals, the parameter plans contain no such physical transition or integration. Essentially the North Station Square and the north-south spine (Kennet-Thames Spine) are physically separate open space entities so that their use is prevented from being continuous or spilling from one to the other.



Figure 1 Parameter Plan with RSAF illustrative scheme traced in blue

b. relationship of Plot D with east-west Avenue

- 5.6 The built form of Plot D directly adjoins the southern boundary of the site where the east-west Avenue travels through the North Station Square to join Trooper Potts Way. Vehicular access is to be provided from Trooper Potts Way into the Appeal site, close up against Block D and cutting the Station Square north in two. The 80 Caversham Road scheme proposes a more southerly alignment that allows better integration with the square (see Figure 2 below). The vehicular east-west route becomes the immediate frontage to Plot D rather than any public realm integrated with the North Station Square itself. Creating a more regular shape gives the flexibility required to accommodate a variety of uses (which could include outdoor events, temporary installations etc) to which spaces can be put as required by LP Policy CR3 ii and 5.3.11, as well as making through routes more legible. The proposal therefore fails to take the opportunity to create a more imaginative use of open space which integrates with this civic square as required by Policy CR3.



Figure 2. Appeal illustrative scheme collaged with the 80 Caversham Road Proposals showing a more southerly alignment for the east west spine set away from Plot D and altogether better integrated with the station square as a whole.

c. extension of Plot D over part of square from second floor upwards

- 5.7 The parameter plans allow the building on Plot D to extend over part of the square from second floor level upwards. This is an important part of the site, as it is where the station square meets the North-South and East-West links, as well as the northern interchange. The proposal would cause the development to intrude into this part of the open space from a relatively low height. This will restrict the flexibility and useability of this part of the open space by ensuring that, over a certain height, the square is an irregular shape that will reduce flexibility of use. Overhead intrusion into the space restricts the use of the land under it for planting or for the erection of temporary structures, such as performance stages or film screens, for instance. This would limit the *“imaginative uses of open space and the public realm, which contribute to the offer of the centre”* contrary to Policy CR3ii.

d. adequacy of pocket park along east west avenue

- 5.8 Whilst the inclusion of a modest pocket park to the west along the east-west avenue is welcomed, no detailed assessments have been made to determine the increased recreational needs of the new residents of the Appeal Site. This failure to consider in detail the open space requirements of the site means there is a failure to demonstrate that such modest standalone provision, unintegrated with the wider CR11e allocation and the North Station Square, will make any meaningful contribution to meeting the overall need of the occupants.
- 5.9 The Open Space Statement of Case (Appendix M to the Council’s Statement of Case) in paragraph 3.9 argues that the location of this pocket park conflicts with the RSAF, specifically figure 8.2, the framework structure. Whilst figure 8.2 is intended to be general in nature rather than defining exact open space boundaries, the location shown on that figure is actually within the adjacent former Royal Mail site and sits outside the red line boundary of the appeal site. With that in mind, Planning Application Committee’s decision of 30th

March to grant permission to application 182252 on that site subject to signature of a Section 106 agreement is an important change. That application provides a widening of the avenue at this junction that emphasises the junction with Caversham Road and Northfield Road, although not specifically a dedicated area of open space. The lack of provision of a more formal open space at this junction did not constitute a reason for refusal for application 182252. In that context, my objection to the specific location of this pocket park on the appeal site falls away but the configuration, setting and general design nevertheless raises concerns -as Mr Doyle sets out in his evidence.

- 5.10 While the on-site provision of play facilities is welcomed, these need to be seen as ‘private’, providing the bare minimum of proximate play space for small children as set out in the FiT standards. They make no contribution to the wider neighbourhood in terms of either amenity or landscape value, as required by the Open Spaces Strategy, as they are effectively ‘defended’ against use by non-residents of the development by being inaccessible to outsiders. Nor do they address the more demanding play and general recreation requirements set out in the national guidelines, in terms of size, variety and accessibility. These needs will therefore need to be met via an off-site contribution to play, sports and other recreational facilities, as included as an obligation for inclusion within a S106 legal agreement set out under RfR 12.
- 5.11 The wording of RfR10 is clear that the proposals fall short of the requirement for integrated and well-designed spaces that benefit the whole area, particularly in terms of alignment of spaces and links between them.

6.0 CONCLUSION

- 6.1 The site is an important gateway site, in a town centre location covered by the RSAF SPD, in an area of the centre of Reading that is poorly supplied with public open space. It presents a significant opportunity to provide, on site, appropriate, well-designed public open space that contributes to a thriving neighbourhood.
- 6.2 National policy stresses the importance of high-quality open spaces for the health and well-being of new communities.
- 6.3 At a local level, a suite of Council policies and supplementary guidance set out the local requirements, seeking to make the town a place for thriving communities in a healthy environment and inclusive economy. It is clear that policy consistently seeks open space provision on a site of this size. Within the town centre of this regionally-significant town there is a particular emphasis on provision of civic squares, and also a strong focus on providing on-site open space that is flexible to accommodate a variety of events and uses.
- 6.4 The Fields in Trust guidelines are regarded as a national standard for the size, equipping and accessibility of recreational open space.
- 6.5 The provision of on-site open space on a site of this scale is therefore expected. The developer is required by the Council's policies to integrate and consolidate any development on this site and any additional open space provision around the planned Station Square North.
- 6.6 I have argued that the proposal fails to provide the appropriate, well-designed public spaces of a flexible size and shape required in terms of:
- the transition between the north-south spine and North Station Square;
 - the relationship of Plot D with the east-west Avenue;

- the extension of Plot D to cover part of the square from second floor level upwards; and
- the adequacy of the pocket park along the east-west avenue.

6.7 In terms of the transition between the North-South spine and North Station Square, the proposal does not open out into the existing public open space so as to integrate the linking spine with adjacent civic space. Essentially the North Station Square and the North-South spine are physically separate open space entities so that their use is prevented from being continuous or spilling from one to the other.

6.8 In terms of the relationship of Plot D with the East-West Avenue, Plot D intrudes into the contiguous open space, effectively dividing it, and creating a less regular shape that reduces the variety of uses to which it can be put as an outdoor civic venue of the type that Reading lacks.

6.9 In terms of the extension of Plot D over part of square from second floor upwards, this effectively ‘sterilises’ the area underneath the overhang for a range of potential activities or design features, reducing flexibility of use.

6.10 In terms of the adequacy and location of the pocket park along the east-west avenue, the Planning Applications Committee’s decision of 30th March to grant permission to application 182252 on the former Royal Mail site subject to the signing of a Section 106 agreement is an important change, in the context of which, my objection to the specific location of this pocket park on the appeal site falls away. I remain of the view, however, that the proposals, unintegrated as they are with the wider CR11E allocation and the North Station Square, do not make any meaningful contribution to meeting the overall need of the new occupants.

6.11 The on-site provision of private play space makes some ‘bare minimum’ provision for small children living on the site but does not address the more demanding play and general recreation requirements set out in the national

guidelines in terms of size, variety and accessibility. These needs will need to be met via an off-site contribution to play, sports and other recreational facilities.

- 6.12 The proposal therefore fails to provide appropriate, well-designed public spaces of a flexible size and shape to meet the need of its occupants. It also fails to demonstrate that it is part of a comprehensive approach to its sub-area which contributes towards the provision of policy requirements for open space that benefit the whole area. This is contrary to policies CR2 b, CR3 ii and CR11 viii of the Reading Borough Local Plan (2019) and the adopted Reading Borough Supplementary Planning Document Reading Station Area Framework (2010).
- 6.13 The proposal therefore fails to make provision for appropriate open space based on the scale of the development or the needs of its occupants and neighbours.