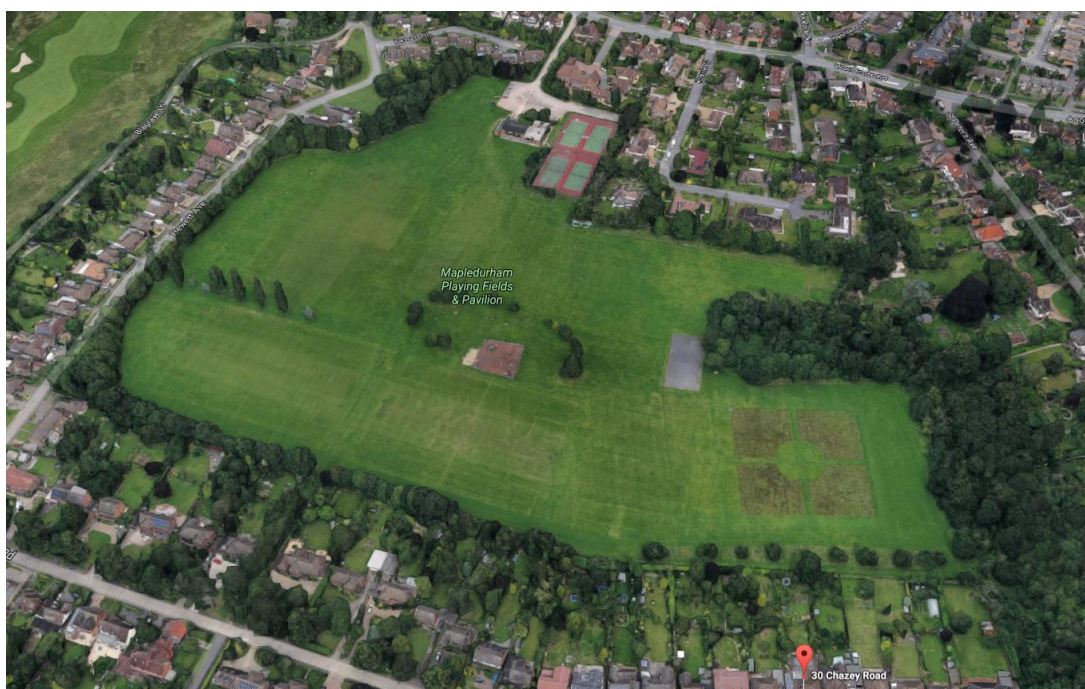


Planning Statement

Mapledurham Playing Fields Landscape Master Plan



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1. Introduction

This Planning Statement is submitted in support of a planning application for a landscape master plan made by Reading Borough Council in its capacity as the Trustees of Mapledurham Playing Fields (MPF), located at 129 Upper Woodcote Road, Caversham, Reading RG4 7LH.

The charitable purpose of MPF is: “the provision and maintenance of a recreation ground for the benefit of the inhabitants of the Parish of Mapledurham and the Borough of Reading without distinction of political, religious or other opinions.”

In August 2018 the Local Planning Authority (LPA) approved the location of The Heights Primary School with subsequent approval by the Trustees, which instigated the development of the landscape master plan.

This Planning Statement assesses the proposals against the policies in the Development Plan and other material considerations and should be read in conjunction with the other supporting planning documents.

2. The site and landscape master plan

The MPF is approximately 11ha in size and consists of a community car park accessed from Upper Woodcote Road, a pavilion which serves as changing and social rooms for the tennis and football clubs; 4no floodlit tennis courts; a children’s play area in the centre of the site (there is no footpath access to it); a small open hard surface ball area, a community orchard, and open areas of sports pitches which are in high use. There is a wooded area at the eastern end and the site has wooded boundaries with a number of informal entrances used by visitors on foot, particularly by dog walkers but no formal footpaths around or across the site. There is a secondary gated entrance off Chazey Road from the south.

The landscape master plan consists of defining access around and through the site with a new tree lined lit central avenue and perimeter footpaths, a new children’s playground accessible from the footpaths, a small trim trail. A small reinforced turf ‘overflow’ informal car park space is proposed north of the new primary school to allow for additional parking. On the eastern side of the new central footpath, an area of the grass sports pitches is proposed to be re-profiled and includes improved drainage (refer to the associated drawings for existing and proposed details).

3. Planning history and pre-application advice

In August 2018, the Local Planning Authority (LPA) approved the construction of The Heights Primary School on the northwest corner of MPF (planning ref 171023/FUL)

In February 2019 the LPA approved a minor material amendment to the original planning approval for The Heights Primary School (planning ref 182200/VARIAT)

Other planning history also relates to the pavilion and the tennis courts, the most relevant of which are:

890904 Single storey flat roof extension to the pavilion's changing rooms / permitted 10.1.1990
 930614 Creation of a tennis court / permitted 28.4.1994
 940439 Erection of floodlighting to two tennis courts / refused 19.10.1995
 981046 Provision of floodlighting to two tennis courts / allowed on appeal 8.4.1999

130613 Replacement and extension of roof, installation of new roof lights and construction of glazed veranda on east elevation / permitted 1.7.2013. These works have been started and therefore the planning approval is extant.

There is a current planning application to be considered by the LPA for new floodlights to the existing tennis courts (planning ref 182140)

Pre-application advice

The Council requested pre-application planning advice from the LPA and received a formal letter reply on 29th January 2019 (see appendices for full letter) which is summarised below:

Officers are generally supportive of the principle of the proposed works which would appear to be sympathetic and enhance the function of this District Park. The proposed works seek to enhance the playing field provision and offer of the part of the site to which they relate and are considered to comply with Policies SA16, CS28 and CS31.

However further detailed information would be required as part of any future planning application to allow a full assessment of the proposals. The main issues are:

- Noise and disturbance to nearby residential properties (particularly Knowle Close) from the relocation of the children's play area
- Visual impact of the proposal lighting columns and lighting itself on the open character of the playing field
- Impact of proposed lighting upon protected species (bats)
- Construction management in terms of storage of materials and plant and access and parking for construction vehicles.

Community engagement

The proposals were developed from a comprehensive consultation exercise in the summer of 2017 to establish the views of beneficiaries which generated 3,313 valid responses. For full details of the results see the separate report on the consultation results submitted as a supporting document.

These proposals have subsequently been reviewed by and feedback formalised through the MPF Management Committee with representatives of stakeholders and users of MPF. This has also been considered by the Trustees of MPF through the MPF Trustee Sub-Committee. Details and minutes of both can be found on the Reading Borough Council website:

<https://democracy.reading.gov.uk/mgCommitteeDetails.aspx?ID=175>

4. Planning policy context

Introduction

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

In this instance the Development Plan comprises the following Reading Borough Local Development Framework documents relevant to this application:

- Core Strategy (CS): adopted January 2008; updated 27 January 2015
- Sites and Detailed Policies Document (SDPD): adopted October 2012; updated 27 January 2015

The National Planning Policy Framework (revised July 2018) is also a material planning consideration in the determination of planning applications.

RBC is reviewing its main planning policies which will replace the CS and SDPD documents above (as well as the Reading Central Area Action Plan). Consultation took place on issues and options in early 2016 and on a full Draft Local Plan (dLP) between 1 May and 14 June 2017. This will in due course be submitted to the government for public examination.

National planning policy

National planning policy is contained in the National Planning Policy Framework (NPPF 2018). At the heart of the NPPF is a presumption in favour of sustainable development. In making decisions on planning applications: *“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”*

Local planning policy

Local development plan policies for the area are contained within:

- Core Strategy (adopted January 2008; updated 27 January 2015)
- Sites and Detailed Policies Document (adopted October 2012; updated 27 January 2015)
- Draft Local Plan (May 2017)

The relevant policies from the CS, considered in this document:

- CS1: Sustainable Construction and Design
- CS5: Inclusive Access
- CS7: Design and the Public Realm
- CS28: Loss of Open Space
- CS30: Access to Open Space
- CS36: Biodiversity and Geology
- CS37: Major Landscape Features and Strategic Open Space
- CS38: Trees, Hedges and Woodlands

The relevant policies from the Development Policies, considered in this document:

- SD1: Presumption in Favour of Sustainable Development
- DM1: Adaptation to Climate Change
- DM2: Decentralised Energy
- DM3: Infrastructure Planning
- DM4: Safeguarding Amenity
- DM17: Green Network
- DM18: Tree Planting
- SA16: Public and Strategic Open Space

The site is the subject to two designations: Public and Strategic Open Space (SDPD Policy SA16 refers) and Air Quality Management Area along Upper Woodcote Road (SDPD Policy DM19). At the eastern end of the MPF site, a major landscape feature (North Reading Dry Valleys, CS Policy CS37) and a local wildlife site (CS Policy CS36 and SDPD Policy DM17).

5. Proposal Assessment

As mentioned previously the application concerns the master landscape plan for the playing fields and this is considered against the following:

- Loss of open space
- Sport England policy
- Design
- Ecology and trees
- Flood risk
- Noise
- Archaeology

Loss of open space

The site is a designated open space and thus CS policy CS28 applies which reads as follows: *Development proposals that will result in the loss of open space or jeopardise its use or enjoyment by the public will not be permitted. In exceptional circumstances, development may be permitted where it is clearly demonstrated that replacement open space, to a similar standard, can be*

provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space. The quality of existing open space should not be eroded by insensitive development on adjoining land.

The first part of this policy is restated in SPDP policy SA16: *Important areas of Public and Strategic Open Space, as shown on the Proposals Map, will be protected from development. Proposals that would result in the loss of any of these areas of open space, or jeopardise their use or enjoyment by the public, will not be permitted.*

The landscape masterplan does not result in the loss of open space but looks to manage and enhance the existing space with amongst other improvements a new footpath network, sports pitch drainage and a new children's play area as detailed in the design and access statement. A small reinforced turf 'overflow' informal car park space is proposed north of the new primary school to allow for additional parking for events that take place on the playing fields. This is insignificant in the overall scheme and is considered acceptable when set against the wider context to improve the landscape.

Sport England policy

Sport England is a statutory consultee on planning applications affecting playing fields under the terms of the Town and Country Planning (Development Management Procedure, England Order 2015). Sport England considers proposals affecting playing fields in the light of the NPPF (in particular para 74), and its Playing Fields Policy: 'A Sporting Future for the Playing Fields of England'. Its policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, unless one or more of the five exceptions stated in its policy apply:

- E1: An assessment has demonstrated that there is an excess of playing fields in the catchment and the site has no special significance for sport
- E2: The development is ancillary to the principal use of the playing field and does not affect the quantity/quality of pitches
- E3: The development only affects land incapable of forming part of a playing pitch and would lead to no loss of ability to use/size of playing pitch
- E4: Playing field lost would be replaced, equivalent or better in terms of quantity, quality and accessibility
- E5: The proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of playing field

The landscape masterplan shows a significant improvement in the quality and accessibility of the playing fields with over 20,000m² of new pitch drainage and new footpaths to help accommodate the future usage of the site. The removal (and replanting) of the central arc of trees and relocation of the children's play area to the north provides a more flexible playing field space in this central area of the playing fields for sports and informal play.

Design

A number of local policies encourage good design, centred principally around CS Policy CS7, which reflects current national policy on good design: *"The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."*

The landscape masterplan, detailed in the design and access statement, illustrates a sustainable designed approach to the future longevity and use of the playing fields.

There are currently no pushchair or cycle friendly accessible footpaths at MPF. The introduction of a lit tree lined 3m wide central footpath and 1.5m wide perimeter footpaths on the western side of the site improves access into, around and through the playing fields. The relocation of the children's play area to the north from a remote central location (with no footpath access) improves its access from the community carpark, pavilion and is linked by the footpath network. This reflects the requirements of CS Policy CS7.

It is proposed that the central footpath will be lit with LED lighting with shielded lamps on 5m columns and directed in line with good practice to avoid light spillage. There is currently no footpaths or lighting through the playing fields which limits the safe use of the site at dusk or early evenings for dog walkers and other users. The introduction of a lit access route will help reduce the potential for crime and safety issues to arise. The new school, multi-use games area, carpark and existing tennis courts are all floodlit on higher columns (6m-10m tall) and a new planning application to extend the floodlights at the tennis courts is being considered. Planning permission for the tennis court floodlights was allowed on appeal in 1999. In allowing the appeal, the Inspector noted that there would be no significant light spillage into back gardens and that the boundaries were in any case heavily-vegetated. The same reasoning applies here with the properties on Hewett Avenue and Chazey Road. The potential ecological impacts of the footpath lights are addressed later.

In summary, the landscape masterplan is the product of detailed consideration in its design and has been scrutinised by members of the MPF Management Committee and the MPF Trustees Sub-Committee. It will have very little direct impacts on adjoining residents. The design thereby meets the requirements of CS Policy CS7 and SDPD Policy DM4.

Ecology and trees

The landscape masterplan is supported by an Ecological Appraisal carried out by John Wenman Ecology and a tree report carried out by Reading Borough Council Parks Department.

CS Policy CS36 seeks to protect features of biodiversity interest. Development which would have a direct or indirect impact on the site will not be permitted unless the need for the development outweighs that interest or if appropriate mitigation is incorporated. SDPD Policy DM18 promotes tree planting as part of development proposals. CS Policy CS38 protects trees, hedges and woodland.

An extended Phase 1 habitat survey was undertaken in November 2018 and a summary is below:

The site is not statutorily designated for its wildlife interest and the proposals will not affect land designated for its wildlife interest or habitats of principal importance for conservation.

The trees to be removed are planted semi-mature parkland trees of no significant ecological value beyond the site level and lack features suitable for roosting bats. The grassland directly affected by the works is regularly mown grass of negligible ecological value.

The proposed 5m high columns along the central pathway will have warm white LEDs which is considered an appropriate luminaire specification to limit impacts on bats. Dark corridors will be retained in the thin perimeter woodland and along the defunct hedge thus there will be no negative impact on commuting and foraging bats.

Existing survey data shows that the proposals are unlikely to affect badgers or their setts; however a walkover survey should be taken before any ground excavations regarding the re-grading the land and installing drainage in order to confirm that badger activity has remained unchanged.

The trees removed suitable for nesting birds should be timed to avoid the bird nesting season (march to august) or take place only after an ecologist has confirmed that nesting birds are not present.

New tree planting should make use of locally sourced native woody species to enhance the ecological value of the playing fields.

The landscape masterplan main impact on trees as detailed in the tree report is the arc of 15no trees in the centre of the site. The tree report shows that the 15no existing trees in the centre of MPF are to be removed consisting of a mix of sycamore, ash and lime, 5no of these are native trees. The perimeter trees are mixed lime and sycamore, although the woodland on the site is richly varied. Given the large number of sycamore and lime on the site, and the current ban on moving ash for planting, it is not proposed to replace the trees like for like. An avenue of 40no new trees is to be planted the site, which will be a strong landscape feature. It would not be appropriate to plant small trees, as the size of the site presents a superb opportunity to plant large avenue trees.

The planting of ornamental trees has been proposed, as the avenue is as much for visual beauty as for summer shade. The rest of the site and surrounding area is well endowed with large trees with wildlife value. Liquidambar trees do well in the locality, and are proposed as being of suitable profile and size, as well as having a strong autumn colour.

On the western side of the playing fields, the line of poplars will be retained. Lombardy poplars are relatively short lived. At around 40 to 50yrs these trees start shedding branches and are very likely to be blown over in high winds, with each successive tree lost exposing the neighbouring tree creating a domino effect. Poplars also have spreading invasive roots that negatively impact on sports turf. One tree has been lost in recent years. As the Lombardy poplars reach the end of their life and start to fail it is proposed to replace all 10no trees with 10no fastigate English oaks (a tall thin columnar variety of the native oak).

In addition to the 40no Liquidambar avenue, the following trees are to be planted:

- 6no specimen trees are to be planted as shown on the landscape plan. Given the almost complete absence of evergreen vegetation on the site, the 6no new trees will consist of 3no Scots pines (*Pinus sylvestris*) and 3no Holm oaks (*Quercus ilex*); the former are native to the UK, the latter to Europe.
- 5no new English oaks (*Quercus robur*) are to be planted to the north east of the playing fields.
- 6no ornamental trees (*Cornus* 'Norman Hadden') are to be planted on the periphery of the pavilion outdoor area

In summary 15no trees would be removed and 57no trees would be planted across the site.

In order to ensure the successful integration of retained trees during the construction works various tree protection measures will be incorporated into the design which is intended to maintain the trees in a safe and healthy condition.

In ecological terms, the scheme will accord with CS Policy CS36. Tree planting and tree protection measures will be carried out in line with SDPD Policy DM18.

Flood Risk

As the application site is over 1ha in size a flood risk assessment has been carried out detailing the low flood risk nature of the site. The site is located in a Flood Zone 1 area, is at a low risk of fluvial flooding with a similarly low risk of surface water or groundwater flooding. The sports pitch sustainable drainage scheme has been designed to current guidance to improve the quality of the sports pitches which will improve the use of this area.

Noise

SDPD Policy DM4 seeks to safeguard residential amenity, including in relation to noise. External noise levels on-site are generated mainly by the school, tennis courts, users of the sports pitches, children's playground and aircraft and traffic on Hewett Avenue. There is no proposed change to the existing users of the site. The only change is the location of the children's play area. Various locations were proposed including just south of the existing tennis courts. These were reviewed by the MPF Management Committee who proposed a new preferred location south of the new school MUGA (multi-games area). This location is circa 40m from the nearest residential boundary on Hewett Avenue and circa 100m from the nearest residential boundary on Knowle Close. This complies with the pre-application advice received to avoid a previous proposed location close to Knowle Close due to previous concerns over noise. The new location is still located further away from residential properties than the existing tennis courts, pavilion and approved new school with their associated outdoor play areas and MUGA. The scheme is unlikely to result in any significant noise impacts above existing noise sensitive receptors and there is no risk of significant adverse impacts on health; and in this context a noise assessment is considered as not required. The design therefore reflects the noise requirements of SDPD Policy DM4.

Archaeology

Archaeological investigations were undertaken by Oxford Archaeology in 2018 and the report is submitted as a supporting document. Evidence of an early roman enclosure was found in the western side of the site which has helped inform the landscape design. As a result the sports pitch drainage works has been relocated to the eastern side of the site.

6. Conclusion

This Planning Statement is submitted in support of a planning application made by Reading Borough Council for a master landscape plan for the Mapledurham Playing Fields. The MPF site is a designated open space as well as being held in trust for the provision of recreational facilities to the benefit of local people. The proposals set out a scheme that meets these requirements and provides an opportunity for the sustainable development of the site without any adverse impacts in planning terms.

7. Appendices

Appendix 1: Pre-application advice

Appendix 2: Policy extracts from Core Strategy and Site and Detailed Policies Document

Appendix 1: Pre-application advice



Giorgio Framalicco
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Andy Lockwood
Reading Borough Council

Our Ref: 182012/PREAPP

Direct: ☎ 0118 937 3625
e-mail: matthew.burns@reading.gov.uk

29th January 2019

Your contact is: Matt Burns Planning & Building Control

Without prejudice

Dear Andy

182012/PREAPP - Mapledurham Playing Fields Upper Woodcote Road Caversham - External works to the c.30,000m² of the playing fields to improve drainage and use of the area. This will involve relocating the children play area to nearer the pavilion, removing the existing tarmac basketball court and removing a bank of trees. A new tree lined and lit central footpath would be installed, with a perimeter path on the western side and a trim trail and new seating

Introduction & Site

Mapledurham Playing Fields is the largest area of public open space in Caversham. The site is accessed from Upper Woodcote Road to the north and it has boundaries with Chazey Road in the south and Hewett Avenue to the west and the rear gardens of properties on St. Peters Avenue in the east.

Although owned and managed by the Council's Leisure and Recreation Service, the land and buildings are operated by the Mapledurham Playing Fields Trust. As Trustee of the Recreation Ground Charity, Reading Borough Council is responsible for delivering the objectives of the Charity which includes the provision and maintenance of the recreation ground for the benefit of the inhabitants of the Parish of Mapledurham and the Borough of Reading.

Planning permission (ref. 171023) was granted on 14th August 2018 for the erection of 2FE primary school (350 pupils) with associated landscaping, multiuse games area (MUGA), car and cycle parking, and servicing in the north-west corner of the playing field.

As part of this permission, a number of mitigation measures in relation to the retained areas of the playing fields were secured by S106 agreement. These mitigation measures require planning permission in their own right and are subject to this pre-application advice request.

Proposals

Pre-application advice is sought in relation to proposed to external works to c.30,000m² of the playing fields. Significant engineering/site re-grading works are proposed and planning permission is required. The proposed works include:

- Re-grading and drainage improvements to the playing field surface
- Relocating the children's play area to the north of the site nearer the pavilion and removal of the existing tarmac basketball court
- Removal of a central bank of trees
- Provision of a new tree lined and lit central footpath and a perimeter path on the western side of the playing field together with a trim trail and new seating

Relevant Planning Policies

National Planning Guidance

National Planning Policy Framework (2018)

Reading Borough LDF Core Strategy (Adopted January 2008, 2015)

CS7 Design and the Public Realm

CS20 Implementation of the Reading Transport Strategy

CS28 Loss of Open Space

CS31 Additional and Existing Community Facilities

CS33 Protection and Enhancement of the Historic Environment

CS34 Pollution and Water Resources

CS36 Biodiversity and Geology

CS37 Major Landscape Features and Strategic Open Space

CS38 Trees, Hedges and Woodlands

Sites and Detailed Policies Document (Adopted October 2012, 2015)

SD1 Presumption in Favour of Sustainable Development

DM1 Adaptation to Climate Change

DM4 Safeguarding Amenity

DM12 Access, Traffic and Highway-Related Matters

SA16 Public and Strategic Open Space

SA17 Major Landscape Features

Emerging LP

Appraisal

Principle

The site is designated as Public and Strategic open space under Policy SA16. This policy states that important areas of Public and Strategic Open Space will be protected from development. Proposals that would result in the loss of any of these areas of open space, or jeopardise their use or enjoyment by the public, will not be permitted.

Officers sought the response of Sport England on this pre-application, but received no response. They will need to be a consultee on the planning application.

Policy SA16 is linked to Policy CS28 (Loss of Open Space) which states that development proposals that will result in the loss of open space or jeopardise its use or enjoyment by the public will not be permitted.

The NPPF defines open space as 'all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity'.

Policy CS31 encourages the provision of new, extended and improved community facilities.

As referred to above, the basic principles of the open space mitigation works were agreed as part of planning permission ref. 171023 for the new school and as such were required to be secured by way of the s106 legal agreement attached to this permission.

The RBC Leisure and Recreation Officer is supportive of the proposal which would provide improved capacity for sport and recreation.

The proposed works seek to enhance the playing field provision and offer of the part of the site to which they relate and are considered to comply with Policies SA16, CS28 and CS31.

Re-grading and Drainage Improvements

I understand that following the findings of archeological investigations the re-grading and drainage improvements are proposed to the eastern part of the site only.

No information regarding the extent of the regrading or drainage improvements have been provided as part of the pre-application request. Details of existing and proposed levels and sections should be provided as part of any planning application along to demonstrate the extent of regrading whilst the proposed drainage improvement measures should also be fully detailed.

The site is located within flood zone 1 which covers areas at the lowest risk of flooding but as a site of over 1ha. (10, 000m²) an application would be required to be accompanied by a flood risk assessment. Details of what information would be required to be provided as part of a flood risk assessment can be found via the following link: <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas>

A construction method statement should also be supplied as part of an application to demonstrate how vehicles, plant and equipment would access and park at the site, as well as where and how materials (earth) and plant/equipment associated with the regrading and drainage improvements would be stored/kept on site. Measures to control and protect nearby residents from noise and dust during constructions works should also be set out in this document.

Re-location of Children's Play Area and Removal of Basketball Court

The existing children's play area is to be relocated from its central position within the playing fields to the northern part of the site near to the existing pavilion and tennis courts. This is to facilitate the consolidation and reconfiguration of the existing playing pitch provision as a result of impacts on pitch availability due to the proposed new school. The existing tarmac basketball court on the eastern edge of the playing field is to be removed. I understand the new play area would be slightly larger than existing, but it would offer a significantly wider range of play equipment as a LEAP.

It is considered that the upgraded play area would offer enhanced children's play facilities at the site and in this respect would accord with Policies CS31 (Additional and Existing Community Facilities).

I understand that removal of the basketball court was considered when permission was granted for the new school with a community use agreement ('dual use') for use of the new school hall and MUGA agreed to mitigate for this loss.

In terms of the position of the replacement play area, three potential locations are proposed within an area to the north of the site: one directly to the south of the existing pavilion, one directly to the south of the tennis courts with the other potential site in between the two.

Relocation of the play area to the north of the site in any of the three proposed positions would move it closer to residential properties than the existing location. The residential properties most directly affected are those to Knowle Close to the east. The main issues would be increased noise and disturbance to these properties. Policy DM4 of seeks to safeguard the amenity of existing and future occupiers of residential properties.

Fields In Trust guidance (Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard) includes recommended buffer zones for play areas between play activity areas and the boundary of dwellings. I understand the proposed new play area would be around 600m² which, in accordance with Fields In Trust guidance would be classified as a Local Equipped Area for Play (LEAP) for which a 20m minimum separation buffer is recommended. The location directly to the south of the tennis courts would fail to achieve this recommended buffer distance and my advice is that for this reason, this option should not be pursued. Furthermore, the Council's Environmental Protection Officer has similarly raised concerns regarding the noise impact to residents.

Based on the above, it is my opinion that the site to the south of the tennis courts and closest to Knowle Close would not be suitable for the relocation of the play area and would be very likely be considered contrary to Policy DM4 and harmful to the residential amenity of the nearest properties on Knowle Close in terms of noise disturbance. Notwithstanding this, an assessment of the noise impact of the other two option areas should be supplied with an application to demonstrate their suitability towards the nearest affected properties.

The separation buffer of the other two sites identified would exceed the recommended 20m and therefore these sites only should be considered for the new play area.

Removal of a Central Bank of Trees and New Tree Lined and Lit Central Footpath

The playing fields comprise mainly amenity grassland, hardstanding, broadleaved woodland in the eastern boundary and a strip of woodland to the north-west of the site, small areas of dense continuous scrub, a strip of introduced shrub to the southeast, and a number of scattered trees across the site.

A central horseshoe shaped bank of trees surrounding the existing play area is proposed to be removed to facilitate the upgrading and reconfiguring of the playing field layout with replacement tree planting proposed along the suggested new central footpath.

The Council's Natural Environment (Tree) Officer has reviewed the proposals and has advised that given the proposed works would come close to the south and west perimeter of the site then the impact on any trees around the perimeter, either on-site or just off-site, needs to be considered as part of any future planning application, especially if formal paths are being proposed around the outer edges.

The Tree Officer notes that the east portion of the site is a designated habitat and green link in the Development Plan (CS36, DM17) and needs to be protected from development activity. There does not appear to be any new development proposed in this part of this site such that there would not be conflict with these policies in this respect.

In terms of tree/landscaping information, the following documents should be submitted as part of any future planning application to avoid pre-commencement conditions (if this is desired) (in accordance with Policy CS38 Trees, Hedges and Woodlands and Policy DM18 Trees Planting):

- Tree survey and Arboricultural Impact Assessment
- Details of protection measures for retained trees
- Details of protection of the western?? portion of field from development works
- Detailed landscaping scheme

The Tree Officer also advises that landscaping to mitigate the visual impact of the raised ground and MUGA may be worth considering.

The Council's Ecology consultant has also reviewed the proposals and note that the preliminary Ecological Appraisal (Campbell Reith, March 2017) submitted under the now approved application (171023) for the new school assessed the trees that are now proposed to be removed as having "negligible" potential to support roosting bats. As such, it is unlikely that the proposals would adversely affect roosting bats.

However, the Ecology consultant does advise that the site offers suitable habitat for foraging and commuting bats and therefore given the proposal includes the addition of lighting columns to the new central footpath any planning application must be accompanied by an artificial lighting assessment in relation to bats. The consultant advises that this assessment is likely to need to be informed by bat surveys over the summer months in order to accord with Policy CS36 (Biodiversity and Geology) which seeks to retain and protect features of biodiversity.

Other than bats there are unlikely to be any significant ecological constraints to the proposals.

The visual impact of the proposed lighting columns and lighting itself upon the open character of the existing playing field must be considered. Policy CS7 seeks that development should maintain or enhance the character of the area of Reading within which it is located. I understand a total of 13 columns are to be installed, however it is unclear as to what height the columns would be. Efforts should be made in terms of colour and a slim line profile of the columns as well as measures to control lighting glow and exposure to reduce their visual impact. A long section view of the lamp columns should be provided as part of any application to assist in the assessment of the visual impact.

Environmental Protection Officers have also reviewed the proposed lighting columns and have advised that any application for lighting should be accompanied by information setting out times of operation of the lighting, a layout plan with beam orientation and a schedule of equipment in the design (luminaire type; mounting height; aiming angles and luminaire profiles) as well as an isolux contour map to show light spill levels (down to 2 lux if operating between 23:00 and 07:00, or down to 10 lux if operating only between 07:00 and 23:00). The plans should identify neighbouring buildings so that the predicted impact on them can be assessed. The applicants should demonstrate that light levels will not exceed the relevant guidance lux levels specified in the table below. Information should also show how glare will be controlled.

Environmental Zone - Brightness	Light trespass (into windows) Ev [Lux]	
	Pre-curfew (before 23:00hrs)	Post-curfew (after 23:00hrs)
E3 - Suburban	10	2
E4 - Urban	25	5

Institute of Lighting Professionals : Guidance Notes for the Reduction of Obtrusive Light
GN01:2011

Archaeology

Berkshire Archaeology has also reviewed the pre-application proposals and understands that following the archaeological investigations on the wider playing field site as part of the school application, significant works is no longer proposed to the northwest corner of the site where Roman Archaeology has been identified. The officer recommends that any future application should refer to the existing archaeological evaluation report, and confirm that archaeology will be preserved either by record or in situ. Mitigation can then be secured by way of condition.

Other Issues

The Section 106 Heads of Terms for the open space mitigation secured as part of the application for the new school also stipulates provision of '*landscaping and ecological surveying and tree planting/habitat enhancements to Mapledurham Playing Fields*'. Further, details of materials for hard landscaping for the new footpaths and location, design appearance of the proposed seating/outdoor furniture for the trim trail should also be included as part of any planning application. Whilst it is appreciated that the levels changes will improve drainage at the site, a SUDS report will need to be supplied with the application and particular this should detail percolation and any hard-surfacing treatments.

Conclusion

Officers are generally supportive of the principle of the proposed works which would appear to be sympathetic and enhance the function of this District Park. However further detailed information, as outlined in the letter above, would be required as part of any future planning application to allow a full assessment of the proposals. The main issues are:

- Noise and disturbance to nearby residential properties from the relocation of the children's play area
- Visual impact of the proposal lighting columns and lighting itself on the open character of the playing field
- Impact of proposed lighting upon protected species (bats)
- Construction management in terms of storage of materials and plant and access and parking for construction vehicles.

If you were to submit an application, please note the validation requirements set out in the Validation Checklist. Please refer to the [Council's website](#) for details.

This advice is given on a without-prejudice basis and not all policies have been considered. This advice is in good faith and will not over-ride the formal consideration of a planning application by the Council. If you wish to discuss the contents of this letter, please contact me on the number given above.

Yours sincerely,

Matt Burns
North / Central Team

Appendix 2: Policy extracts from Core Strategy and Site and Detailed Policies Document

Policy CS4: Accessibility and the Intensity of Development

The scale and density of development within the Borough will be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities. Sites will be assessed in terms of their level of accessibility to a defined district or local centre with a good range of facilities by pedestrian routes, and to a bus stop served by a strategic bus service. Unless it can be demonstrated that the accessibility of a site is to be significantly upgraded, for example, by providing high quality pedestrian routes or providing access to good public transport services, any new development must be at a scale, density and intensity appropriate to that level of accessibility as set out in other policies in this document, other Development Plan Documents or Supplementary Planning Documents.

Policy CS7: Design and the Public Realm

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; 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; and 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 and minor developments should be accompanied by a design and access statement that deal with all the above matters.

Policy CS28: Loss of Open Space

Development proposals that will result in the loss of open space or jeopardise its use or enjoyment by the public will not be permitted. In exceptional circumstances, development may be permitted where it is clearly demonstrated that replacement open space, to a similar standard, can be provided at an accessible location close by, or that improvements to recreational facilities on remaining open space can be provided to a level sufficient to outweigh the loss of the open space. The quality of existing open space should not be eroded by insensitive development on adjoining land.

CS30: Access to Open Space

In areas with relatively poor access to open space facilities (possibly as a result of severance lines), new development should make provision for, or contribute to, improvements to road and other crossings to improve access to green space and/ or facilitate the creation or linking of safe off-road routes to parks.

CS36: Biodiversity and Geology

a) Development should retain, protect and incorporate features of biodiversity or geological interest (including protected species and their habitats) found within the application site into their schemes. On sites with recognised biodiversity or geological value, development will not be permitted where there would be a direct or indirect adverse impact on the site, unless it can be clearly demonstrated that:

- i. The need for development clearly outweighs the need to protect the value of the site; and
- ii. Appropriate compensation, impact minimisation, mitigation and compensation are provided.

b) Local Nature Reserves and Wildlife Heritage Sites will be safeguarded and where possible, enhanced. Permission will not be granted for any development that would adversely affect a designated nature reserve or Wildlife Heritage Site.

c) Any development that would sever or threaten the integrity of an established wildlife link, as indicated on an adopted proposals map, will not be permitted. Where applicable, developments should be designed to protect, consolidate, extend and enhance the network of wildlife links and corridors in and adjoining the Borough, working with neighbouring authorities where appropriate.

CS37: Major Landscape Features and Strategic Open Space

Planning permission will not be granted for any development that would detract from the character or appearance of areas designated as a Major Landscape Feature. The designated areas are: The Thames Valley; The Kennet and Holy Brook Meadows; The West Reading wooded ridgeline; The East Reading wooded ridgeline; and The North Reading dry valleys.

CS38: Trees, Hedges and Woodlands

Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal, and the Borough's vegetation cover will be extended.

SD1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then permission will be granted unless material considerations indicate otherwise - taking into account whether:

Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework indicate that development should be restricted.

DM4: SAFEGUARDING AMENITY

Development will not cause a significant detrimental impact to the living environment of existing or new residential properties, in terms of: Privacy and overlooking; Access to sunlight and daylight; visual dominance and overbearing effects of a development; Noise and disturbance; Artificial lighting; Vibration; Dust and fumes; Smell; or Crime and safety. The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy. As well as immediate impacts, other aspects to which this policy applies will include matters such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). Proposals which would generate regular movements of HGVs on residential roads will not be acceptable. Where an otherwise acceptable development could change its character to a use that would have a greater impact on amenity without needing planning permission, conditions will be applied to restrict such changes; compromise the safe movement and free flow of traffic on the network or the safe use of the road.

DM17: GREEN NETWORK

The identified Green Network comprises Local Wildlife Sites, Local Nature Reserves, Areas of Biodiversity Action Plan (BAP) habitats and designated open space plus both existing and potential Green Links, all of which are shown on the Proposals Map. It also includes Biodiversity Opportunity Areas, shown in Figure 4. These Green Links shall be maintained, protected, consolidated, extended and enhanced. New development shall demonstrate how the location and type of open space, landscaping and water features provided within a scheme have been arranged such that they

maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

DM18: TREE PLANTING

New development shall make provision for tree planting within the application site, 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.

SA16: PUBLIC AND STRATEGIC OPEN SPACE

Important areas of Public and Strategic Open Space, as shown on the Proposals Map, will be protected from development. Proposals that would result in the loss of any of these areas of open space, or jeopardise their use or enjoyment by the public, will not be permitted.

SA17: MAJOR LANDSCAPE FEATURES

The following areas, as shown on the Proposals Map, are defined as Major Landscape Features: The Thames Valley; The Kennet and Holy Brook Meadows; The West Reading wooded ridgeline; The East Reading wooded ridgeline; and The North Reading dry valleys. Where the urban area meets the Chilterns Area of Outstanding Natural Beauty (AONB), as shown on the Proposals Map, there should be no development which would have a detrimental impact on the AONB in terms of scale, design, layout or location.

Appendix 3