

Memo

To: Jonathan Markwell, Planning

From: Sarah Hanson, Natural Environment Officer, Planning

CC: GS Ecology

Date: 9 June 2021

Re: Consultation on a Discharge of Application

Application Number: 210866
Application Type: Approval of Conditions
Address: Wensley Road Reading
Proposal: Discharge of condition 23 (hard and soft landscaping scheme) of planning permission 200122, as granted on 16/12/2020.

With reference to **Reading Borough Council Wensley Road : New Build & Estate Improvements, Hard & Soft Landscaping Report RBC-WLR_HTA_L_RP_1710 dated May 2021:**

This document includes details on the play areas and equipment. I will leave Leisure to comment on this (and for condition 29). The only comment I have is to reiterate the importance of following the approved AMS (section 4.12) as installation of the equipment is likely to involve ground works within RPAs of retained trees.

4.0 Tree Strategy states: *'Overall we aim to propose the planting of 209no new trees'* and further explains that: *'In a development from the Planning Submission, we have proposed additional tree planting within the play area to create a woodland aesthetic. An additional 43no new trees are currently proposed in Phase 2, which can be further reviewed during that planning application. This currently provides an overall total of 252no new trees'*

210621 HTA response: not entirely sure where these figures are being referenced from? As per the Planning Approval for Phase 1, 209no trees with a minimum of 70no trees within Phase 2 to achieve minimum 279no trees across both Phases will be met.

Firstly, this not as per the overall tree planting requirements of 275+ trees but falls short with no information on off-site tree planting to compensate (as allowed by the S016 for 200122). Secondly, these figures are not consistent with those given for application 210549 for Phase 2 in which it is stated that the overall tree provision will be 279 trees, including 70 within Phase 2, albeit it appears from that application that more than 70 are proposed (see comments for 210549). *210621 HTA response: notes re Phase 2 tree numbers will be responded to in 210549. Tree numbers cannot be absolutely confirmed*

between Phase 1/2 at this stage as we are still coordinating with existing below ground services/infrastructure etc and finding unsurveyed services on site. Where possible we are relocating tree positions, however a few trees may be relocated into Phase 2 locations. For these reasons, at this moment in time we can confirm the minimum number of 279no trees across both Phase 1 and 2. If for any reason this number cannot be met, we still have the option for off-site tree planting as allowed by the S016 for 200122.

TREE STRATEGY –	
Number of trees to be removed	66 individuals (34 C Cat, 22 B Cat, 10 U Cat)
	209 trees from within 13 groups (169 C Cat, 40 B Cat)
Total number of trees to be removed within both Phase 1 and Phase 2	275
NOTE	<i>It was agreed following a site meeting between ACD and the Tree Officer (Parks) and Carolyn Jenkins that Turkey oaks T87, 90 & 93 would be shown to be removed as they are due to be felled for H & S reasons (unrelated to development and therefore unrelated to this planning application). These three trees are therefore not included within the total number of trees to be removed.</i>
Proposed new trees AGREED AT PHASE 1 PLANNING APPROVAL	Phase 1 = 209 Phase 2 = a minimum of 70 trees = overall tree replacement of 279no trees
Number of trees proposed AT PHASE 2 PLANNING	A minimum of 70no trees will be planted to ensure that an overall replacement of 279no trees is achieved across both Phases 1 and 2. It is anticipated to be in excess of this number.
Summary:	As part of the reconfiguration of the open space, there is a requirement to remove a total of 66 individual trees and 209 trees within groups which will also facilitate Phase 2 works. Separate to this, three Turkey Oak trees are proposed for removal by Reading Borough Council due to health and safety reasons that are not associated with the proposed development. A total of 279 new trees will be planted as part of the proposed and second phase of works.

The Woodland edge planting confirms (as it does for 210549) that Silver birch, Scots pine and Rowan and proposed, however it also includes Holly which is not mentioned in the Phase 2 application or in the planting plans for this site. *210621 HTA response: the*

Phase 2 planting strategy has been refined. Our response will be made in comments on that application.

Street tree planting across the site includes Silver Lime, upright Field maple, a double flowering Wild Cherry, very upright form of Hornbeam, River birch, Silver birch and English Oak. The central play place includes 'succession' planting of English oak and Sessile oak, with 'specimen' trees of Scots pine, Cercis canadensis and Silver birch.

I have some concerns about the planting palette in that it includes Lime and Cherry which are the two more dominant genera in the Borough (on Council land) hence are those we are discouraging in landscape schemes until at least 2025. In addition, when looking at the number of each species included, from the illustrations, there is a domination of Birch (see later comments). The inclusion of Sessile oak is understandable as one of the two natives, but unusual as the south-east is outside its normal distribution range (of western areas). *210621 HTA response: Please confirm whether you would prefer to replace all the Sessile Oaks with the English Oak.*

In relation to railings, also see comments under 210549 regarding the question of areas where they appear to be omitted on the perimeter. When details for condition 24 (boundary treatment) are submitted, this may clarify matters. *210621 HTA response: please refer to our response on Phase 2 comments*

8.0 indicates the central space lighting strategy and from this indicative plan there would appear to be direct conflicts between trees and lighting columns so initial comments on that is sought as lighting is included in part b of condition 23, albeit detailed lighting locations will be assessed through condition 37 when submitted. The design of the lighting columns is positive for the setting and the ability to combine with CCTV could be useful although the latter will require consideration of existing and future tree canopies to avoid requests for pruning in the future. If CCTV doesn't have its own condition (I can't see one), then condition 23 arguably covers this, hence details should be confirmed.-

210621 HTA response: lighting columns have been coordinated with tree positions. CCTV locations are proposed to be mounted to lighting columns. CCTV to external landscape areas will be installed and management by RBC as a separate phase of works.

With reference to the following plans:

Landscape GA HTA-L_DR_1900 Rev C – no particular comment apart from the difference between shrub and hedge planting is difficult to distinguish without zooming in considerably. Landscape layout around the tower blocks is consistent with that shown for Phase 2 under 210549.

Landscape GA HTA-L_DR_1901 Rev C – comments as above.

Levels Plan 1 of 2 RBC-WLR-HTA-L_DR_1902 Rev C – my primary concern would be changes in levels within the RPAs of retained trees, hence I have focused on the central play area where there appears to be increases and decreases. It would be helpful to have a clear statement on changes in levels within RPAs, why, what and how they will be managed. *210621 HTA response: levels have been designed to even out the hard surfaced space in the play area, omitting small steps, and sudden changes in awkward levels that currently exist on site. This allows the play area to be more easily used and safe. The use of Cellweb is key in the RPA's and the levels here have been typically*

'raised' by 150mm to minimise damage to the RPA. These levels have been set as the fixed parameters that the remaining play space levels/grades have had to tie into. We have enclosed an updated levels drawing as some refinement has taken place since issuing.

Levels Plan 2 of 2 RBC-WLR-HTA-L_DR_1903 Rev C – as above, my primary concern would be changes in levels within the RPA of the retained tree shown. It appears that existing levels are shown around the perimeter of the RPA and only proposed levels within it, where it appears there are changes. Clarification is required.

Soiling Plan 1 of 2 RBC-WLR-HTA-L_DR_1920 Rev A – the principles shown on this plan are largely acceptable. However, in the notes it is stated that tree pits will have *350mm depth approved imported topsoil BS Standard 3882 over 400mm depth free draining approved imported subsoil*. BS3882: 2015 Specifications for topsoil says tree pits should have 600mm subsoil with 300 topsoil (total depth 900mm). This would relate to all trees, even those with adjacent root cells as those are planted within soft beds. I note the Rootspace is 600mm deep which is sufficient within the over tree pit design. In relation to the Cellweb (or similar) areas I note the intended 75mm depth which is fine for paths/pedestrian areas only, hence I assume that no vehicular access will be required for these areas, ever. Confirmation would be useful. Root volume provision noted and appears acceptable for the tree species currently proposed.

210621 HTA response: the specification of 350mm depth topsoil over 400mm subsoil is widely accepted as good practice in this situation. We regularly collaborate with Tim O'Hare Associates and this detail follows their guidance.

With regards to the Cellweb specification, we shall amend to the 100mm depth product to futureproof for a small maintenance vehicle.

Soiling Plan 2 of 2 RBC-WLR-HTA-L_DR_1921 Rev A – comments as above

Landscape Planting Plan 1 of 2 RBC-WLR-HTA-L_DR_1922 Rev A and Landscape Planting Plan 2 of 2 RBC-WLR-HTA-L_DR_1923 Rev A – these show tree, shrub and hedge planting across the site, excluding that within the play areas and Phase 2 areas. Plan 2 of 2 includes no planting schedule so I assume the one on Plan 1 of 2 covers both plans. *210621 HTA response: correct.*

Within this the tree planting includes 1 Cercis, 12 Betula nigra (River birch), 32 Betula pendula (Silver birch) – total of 44 Birch – 12 Tilia Tomentosa Brabant (Silver Lime), 34 Prunus avium Plena (Wild cherry), 15 Acer campestre Streetwise (upright Field maple) and 2 Carpinus betulus Frans Fontaine (very upright Hornbeam). The planting is not consistent with the location of species across the site as shown in Section 4.0 Tree Strategy, e.g. no Oak is included in the north-east corner, very few Carpinus are included (replaced by Prunus) and no Holly is included. Clarification is required. *210621 HTA response: due to a software error, the numbers for Hornbeam and Birch were mixed. We can confirm that these drawings should have read 15no Hornbeam and 19no Betula pendula which would be consistent with the Tree Strategy. We will issue the latest Planting Plans that have corrected this error. Due to an existing Stormwater easement, the oak in northeast corner has been replaced with tree planting elsewhere on site. Holly planting was shown in Phase 2 areas – please refer to Phase 2 proposals. Due to anti-social behaviour on site and liaising with Secure by Design, we are ensuring to specify clear stem trees to maintain visibility across site, hence the removal of Holly from both proposals.*

Detailed Planting Plan HTA-L_DR_1931 Rev A and Detailed Planting Plan 2 of 2 HTA-L_DR_1932 Rev A - these show the tree, shrub and hedge planting within the play areas and appears consistent with that shown in 4.0 Tree Strategy.

I have some concerns about the density of (Birch) planting and whilst I appreciate the intended nature of the planting, I am concerned that this will result in crowded/suppressed planting with each tree fighting for light and become tall & thin with canopy confined to the top and/or leaning to reach light, i.e. I question the longer-term success of the planting. *210621 HTA response: this approach has been discussed with and even suggested by the RBC Parks dept during the development of the planting strategy. We have found this to be a successful typology in similar urban contexts and it is not uncommon.*

The diversity of species proposed is not acceptable. Our aim for landscape schemes (with ref to the Council's Tree Strategy) is to have a 30:20:10 ratio of Family:genus:species respectively to increase diversity across the borough. *210621 HTA response: The RBC Tree Strategy has recently been revised in March 2021 so we were unaware of this new requirement.*

From some quick calculations, the total number of trees (from the plant schedules on the plans) for Phase 1 is 205 (yet a different number). Of these, 124 (60%) are Birch with 112 (55%) being *Betula pendula*. *Betula*, along with *Carpinus*, belong to the same family, meaning tree planting is dominated by one family (*Betulaceae*), particularly one genus. The planting includes 34 (17%) *Prunus*, specifically *Prunus avium* which is more than the ideal 10% of one species and given that *Sorbus* (proposed under Phase 2) belongs to the same family (*Rosaceae*), this may result in too many from this family too. In addition, as mentioned above, *Tilia* and *Prunus* are over-dominating in the borough hence the number of *Prunus* proposed, at least, is not acceptable.

The tree planting palette needs to be reconsidered in view of the Council's Tree Strategy and a statement of diversity should be included.

210621 HTA response: we have reviewed tree species where appropriate. Please see the attached spreadsheet which shows the current breakdown of species and a second proposed schedule of species. This spreadsheet currently refers only to Phase 1 tree planting. The total number of trees currently stands at 206 no due to the reasons aforementioned regarding underground services coordination. We will review the Phase 2 planting schedule as we progress with detailed design of that Phase. As the planning for this project precedes the new recommendations, we hope that a compromise can be met regarding the birch woodland planting.

Typical Details – planting RBC-WLR-HTA-L_DR_8930 Rev A – this shows tree pit specifications. In relation to the Typical Detail - Tree pit in hard with tree grille – this appears to show a solid root director in the drawing but 'Root deflector ReRoot 2000' is specified; ReRoot 2000 being a flexible root barrier – clarification is required. *210621 HTA response: this should read as RootDirector RD1400A – we shall amend annotation .* Also, I'm not clear why subsoil or Rootoil 20 (as per the root cell fill) is not included under the root ball but sand instead, as roots will need to grow down into this area before spreading laterally into the root cells – clarification is required. *210621 HTA response: we shall amend detail accordingly.* In relation to Typical Detail - Tree pit in soft, the depth of soil is not as per BS3882: 2015 Specifications for trees (see comments above for the Soiling plans). *210621 HTA response: 350mm topsoil over 400mm subsoil meets requirements. Please see response to soiling plans above*

I note there is no reference to root barriers for the Trees in Soft ground hence I assume the applicant is happy that none are adjacent to hard surfacing or services – confirmation is required. *210621 HTA response: we shall ensure that a clause is in the specification*

I note 'Utilities & Root space Guide' from GreenBlue Urban and their 'Urban Trees, Highways & Utilities' guide – these have been submitted, I assume, to demonstrate the appropriateness of RootSpace (a specific root cell), its load bearing capacity and ability to allow service routes to pass through. The use of this is positive and will obviously have to be installed under expert guidance.

With reference to **Landscape Specification STAGE 4 - FOR INFORMATION B 22-04-2021** this includes a vast amount of information that others will need to check, hence I have only focused on that relating to soft landscaping details and specifications (required by part d of condition 23). This is a document containing standard information hence is largely acceptable except for the following, mostly commonly raised, issues:

- Q30 – 610 – rectification is required whatever the reason for failure, including theft and malicious damage *210621 HTA response: seeded turf areas only occur in private gardens, hence exclusion of theft or malicious damage*
- Q31 should make reference to 4.7.3-4.7.5 of the approved Arb Method Statement which relates to planting. *210621: HTA response: noted – will amend*
- Q31, 245 – reference to biosecurity labelling should be made as we expect all plants to be responsibly sourced. *210621 HTA response: noted – will amend*
- Q31, 260 (2) – approval should be from the LPA *210621 HTA response: noted – will amend*
- Q31, 720 – replacements are required whatever the reason for failure, including theft and malicious damage Spec says only for duration of Rectification period *210621 HTA response: correct. Replacements due to theft and malicious damage that occurs within the contract (incl Rectification Period) are included. We can amend the wording in spec better to avoid any confusion.*

No details on plant establishment is provided within this document as required by part c of condition 23, but I'm happy for this to be dealt with under condition 25 (Landscape management plan) at the appropriate time. *210621 HTA response: noted*

No details of services have been provided, as required by part d of condition 23 – this requires all services and I note there will be an overlap with condition 40 (SUDs)

In conclusion, condition 23 should not yet be discharged for the reasons above.

As an aside, once landscaping is finally determined, particularly tree species, soil type should be checked and if liable to seasonal volumetric change (mainly clay), foundations should be designed to take into account the mature size (height and spread) of adjacent proposed trees.

In Summary;

HTA Response 210816 - The newly planted trees as part of the Wensley Road Residential Phase 1 delivery, will be maintained by Glenman throughout the 12 months defects period from Partial Possession/Handover of each phase of the works.

- With regards to damage or unlawful removal of trees commencing from Partial Possession/Handover of each phase of works, replacement of trees will be undertaken by Reading Borough Council up to 5 years from Partial Possession/Handover of each phase of the works