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Ethne Humphries
Planning Department
Reading Borough Council
Civic Centre
Bridge Street
Reading RG1 2LU

7 May 2020

Portal Reference: PP-08357218

Dear Ethne,

**Planning Application for Extensions
The Abbey Senior School, 17 Kendrick Road, Reading, RG1 5DZ**

I write to submit evidence that the removal of the 4no. scot pine trees is required and justified. Please find enclosed the following documents:

1. Addendum Letter prepared Eight Associates dated 6 May 2020.
2. Outline Planting Schedule prepared by The Landmark Practice
3. Drawing number 181006-1200 Rev P02 Existing Site and Ground Floor Plan
4. Drawing number 181006-1400 Rev P05 Proposed Site Plan

Justification for the Removal of the Trees

The reason and justification to that the access road where the trees are in situ, is the only vehicular access the school has to this part of the school campus. The other access road is owned by Reading University and they have controlled use of hours over this. The conditions that the existing trees are subjected to, in an urban environment is having a detrimental effect on the growth of the trees, shown by the suppressed form that the trees display with the inverted upper branches.

The addendum to the submitted Tree Report, prepared by Eight Associates provides a detailed explanation, setting out that the existing trees are subject to a much shorter life span than normal due to the constrained conditions that the trees have.

It is proposed to replace the existing 4no. Scots Pine trees with 10no. new semi-mature evergreen specimens. The replacement scheme will include the planting of:

1. 4no. Scots Pine trees at the boundary of the school to the east of the existing trees. This will require the removal of existing hard-surfacing of the car parking area to the south of the Netball Court.
2. 4no. Stone Pine and further 2no. Scots Pine specimens in planters adjacent to the new 6th Form Parking Spaces.
3. Semi-mature trees of 20-25cm girth and heights of 4.5-5.0 metres from a reputable UK nursery.

The 4no. replacement Scots Pine trees at the southern boundary are proposed to be planted approximately 1.5 metres into the site from the southern boundary. The area available would provide more than adequate soil volume in soft ground for the trees to establish and thrive. This greatly improves upon the current conditions associated with the existing trees. These four trees have been positioned at **approximately 7.5 metre spacings, providing enough space for the crowns to develop into maturity**, whilst minimising future conflict with the Netball Court to the north and access road to the west. The four new trees will be located directly adjacent to an existing tree belt. Thus, providing potential for improved connection for wildlife habitat.

Planning Policy Position

Policy EN14 seeks to protect trees from damage of removal where they are of importance, stating new development shall make provision for tree retention and planting within the application site, 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 contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

Whilst the policy states trees are to be protected and retained, **supporting para 4.2.68** sets out:

“New development should seek to incorporate strategically sited trees that will provide shade and cooling to developments, particularly to street frontages, large hard landscaped areas and other areas of public realm. Off-site tree provision will be appropriate in some cases where it has been demonstrated that acceptable development cannot provide an appropriate level of mitigation planting (where trees are to be removed) and/or new planting within the site. This will be of particular importance where such sites are within or on priority tree planting areas/routes, as defined in the Tree Strategy. There will be a need to use appropriate large canopy species that are adaptable to future predicted climatic conditions (native species if possible and where appropriate in order to deliver biodiversity benefits), particularly the higher temperatures and potential drought conditions predicted in summer. Tree stock should either be UK grown or sourced from a domestic nursery that retains its trees for a minimum of one year (a full growing season) within the UK before sale to ensure plant health and non-infection by foreign pests or disease.”

This supporting paragraph recognises that there are instances where mitigation is appropriate, where the development is acceptable.

The quality of the proposed development itself has been confirmed as being acceptable and the only reason that RBC wish to refuse the application is due to the loss of these 4no. scot pine trees.

The benefits the proposed planting scheme will deliver are as follows:

1. 4no. Mature replacement scot pine trees, in a location which will allow the trees to flourish and have a longer life span.
2. 6no. further additional trees to enhance the landscaping provision in this particular part of the site, seeking to reduce the carbon footprint and increase biodiversity.
3. Provide additional landscaping throughout the campus to seek to meet RBC's objectives to contribute to the provision of landscaping throughout the Borough.
4. A planting after care plan to ensure that the measures agreed are maintained in accordance with the planning process.

In relation to these trees, which are being subject to a Tree Preservation Order, the **RBC Tree Strategy 2010** sets out:

“The Council will seek to prioritise the protection, maintenance and planting of trees that contribute to:

- Preserving and enhancing the character and appearance of the environment of areas of the town, particularly designated conservation areas, and the amenity of other areas where trees are a notable and important characteristic of the local environment;*

Objective 6: The role of new developments.

New development will be expected to make a positive and sustainable contribution supporting the objectives of this strategy in enhancing Reading’s urban environment. Such planting should be used to enhance streets and other public realm as part of planning permissions for all relevant new developments, particularly in higher density urban developments.

7.3.5 Planting on new development sites

New development increases the pressure on green infrastructure and it is reasonable to expect new development to incorporate new trees within the boundary of a site, wherever possible. The Local Planning Authority will continue to secure tree planting as part of landscaping schemes associated with new development proposals where appropriate.

*The Local Planning Authority will exercise its powers to require replacements for trees to be planted in landscaping schemes or protected by a Tree Preservation Order **unless there are valid reasons why it should not to do so.**” (my emphasis)*

This letter sets out valid reasons as to why these TPO trees should be replaced. For clarification these are:

1. This is the only vehicular access to the school campus and the urban environment in which the trees are growing is restrictive, which is impinging on the quality and life span of the trees. This has resulted in the lower categorisation of the trees (B and C).
2. The views of these trees from Morgan Road is obscured for over 2m by the boundary treatment and there are very limited open views due to the enclosed urban environment, which results in lower amenity value that is afforded to these trees.
3. There is suitable and in excess compensation to mitigate against the loss of the trees, with the proposed planting scheme.
4. There would be appropriate planning conditions to ensure the longevity and aftercare of the newly planted trees.

We therefore respectfully request that RBC consider this information, which would provide significant educational benefits and provide a conditional approval of the planning application.

I look forward to a response from you before 15th May 2020.

Yours sincerely,



Kathryn Williams BSc (Hons) MA MRTPI
Managing Director
KEW Planning