

Memo

To: Matthew Burns, Planning

From: Sarah Hanson, Natural Environment Officer, Planning

CC:

Date: 16 September 2024

Re: Consultation on an Application

Planning Application Ref: PL/24/0846
Application Type: Full planning permission
Address: Napier Court Napier Road Reading
Proposal: Demolition of existing buildings and erection of new buildings of 11 and 12 storeys, with amenity space at roof level (part indoor and set back), to provide 576 build to rent residential dwellings (Class C3) with residential amenity space, parking, landscaping and associated engineering works.

In terms of expectations for tree retention and planting, a number of trees on the site are subject to a TPO ref 13/10 (EN14); the site is within an AQMA (EN15); the site backs on the railway, which is a designated 'treed corridor' in the adopted Tree Strategy, and the site is located opposite Kings Meadow – a Major Landscape Feature (EN13). As such this makes tree retention and planting a higher priority and there is an expectation that landscaping is incorporated to improve air quality, to enhance the railway corridor (taking into account Network Rail planting restrictions), along with enhancing the Napier Road frontage (outside the MRT zone) to acknowledge the MLF. Whilst on the edge of the RSAF area, the Framework Design (Fig 8.3) indicates a continuation of tree planting on the Napier Road frontage continuing east of the new Thames Quarter development, hence inclusion of this is also expected.

The site was subject to a pre-application in 2022 and comments provided on this made the above clear, along clarifying that landscaping should provide a net gain in tree number (ref EN14) and follow the principles in our Tree Strategy and BAP and that if any elements included flat roofs, green roofs will be expected (blue/green or brown roofs could also be considered).

The provision of landscaping in accordance with the above has to allow for the safeguarded MRT route (existing green strip to the front), hence space outside this should be adequate on the frontage to enable provision of meaningful landscaping whilst not impacting the route.

Policy CR11i is specific to this site, stating:

CR11i, NAPIER COURT:

This area will be developed for residential. The design must avoid detrimental effects on the adjacent Thames Valley Major Landscape Feature, and building heights should reduce from west to east across the site. Land on the Napier Road frontage will be safeguarded for Mass Rapid Transit. Development of the Network Rail depot will be dependent on an alternative location at the railway triangle to the west of the centre becoming available. Development should take account of mitigation required as a result of a Flood Risk Assessment.

Landscaping

With reference to the DAS dated June 2024, this advises the inclusion of: Roof top private amenity space and external terrace (11th Floor level) ; a courtyard to the rear of Block B; a pocket park (including covered walkway) between Block B & C; public realm fronting Napier Road.

I note that 2 small green roofs are proposed at first floor; one between Blocks A & B (rear of landscape courtyard) and one between Blocks C & D. In addition, 2 small green roofs are proposed at floor seven in the same locations and at the ninth level 4 small green roofs are proposed located centrally in each Block. These are shown on **Roof Plan RG-LD-102 P5**. PVs are included at roof level, however, no green / blue/green or brown roofs are included alongside these (the two are mutually inclusive) – clarity on the omission is required. Similarly, Roof terrace at Level 11 includes a PV array – why can't this be a biodiverse green roof too?

I note each Block is 'stepped-in' in the centre of the Block on the frontage to allow some landscape space, which is otherwise severely restricted by the provision of the footway/cycle and MRT zone (grass verge between path and road). However, this still results in restricted space for tree planting, being then hemmed in by 3 sides.

The Pocket Park is shown in the visual below:



The DAS suggests this provides a 'Visual link to Kings Meadow'. However, I would suggest the visual benefit of this park is significantly limited by the covered walkway (associate pillars) and boundary treatment combined – tree species are all relatively small

as well. A more open visual to the park would be more appropriate to help soften the frontage and provide that 'link'.

I note that within the Pocket park, trees are included in raised planters – clarity on why would be welcome (as opposed to in the ground). I note that no detail of these planters is provided nor dimensions to demonstrate their soil volume to ensure it is appropriate to trees. This is required.

A Landscape Strategy plan is provided in the DAS as follows:



6.9 provides the 'Tree Strategy' to the proposed planting. This include predominantly *Amelanchier arborea* 'Robin Hill' along the frontage with 3 multi-stem *Cornus kousa* var. chinensis at the west end of the frontage. Whilst I have no objections to the use of either of these in a landscape scheme, they are both very small trees (5-7m tall at maturity) hence do not provide sufficient scale for softening of the proposed buildings. This, along with the comments made above, makes the proposals inadequate in this respect, leading to the domination of a hard building elevation(s). The inclusion of taller but narrow species should be considered. The use of Liquidambar is not positive in terms of biodiversity benefit, and, in any case, I question the appropriateness of this species/cultivar in the location proposed (rear courtyard) given its ultimate size.

Planting also includes single species hedging on the frontage and mixed native hedging to the rear, along with shrub planting.

Regarding the illustrative concept for the landscape links to Kings Meadow, it is difficult to put much weight to this as it appears discussions with RBC are ongoing, with nothing agreed. The principle is worth exploring though.

Various drawings have been submitted to show landscape details:

Softscape diagram SK02 P,

Proposed Trees Diagram SK03 P (shows existing and proposed),

Overall Landscape Reference Plan RG-LD-101 P6,

Hard & Soft Landscape GA Sheet 1 of 4 RG-LD-200_1 P6, Hard & Soft Landscape GA Sheet 2 of 4 RG-LD-200_2 P6, Hard & Soft Landscape GA Sheet 3 of 4 RG-LD-200_3 P6, Hard & Soft Landscape (Spec Sheet 4 of 4) RG-LD-200_4 P3,

Landscape Typical Details_Planting RG-LD-400-1 P4 (shows typical tree pit detail in soft landscape and pavement make-up around retained trees)

The building proposals are significant in their size (height and width of the Blocks combined) so create a substantial hard face opposite Kings Meadow. The planting on the front is confined by the need to provide a cycle/pedestrian route and the leave an MRT zone, and further confined by the limited set-back provided from these. Tree planting on the frontage is therefore very constrained in its size and this, combined with the limited pocket park views and no views of the green roofs, results in a predominantly hard elevation. It would perhaps have been more visually useful, in terms of softening, to have greater insets to the buildings and/or courtyards visible from the frontage, to allow more softening.

If you are content with the hard / soft balance from a visual point of view and do not intend to push for any amendments, landscaping should be secured by standard condition L2 – the current details are not acceptable.

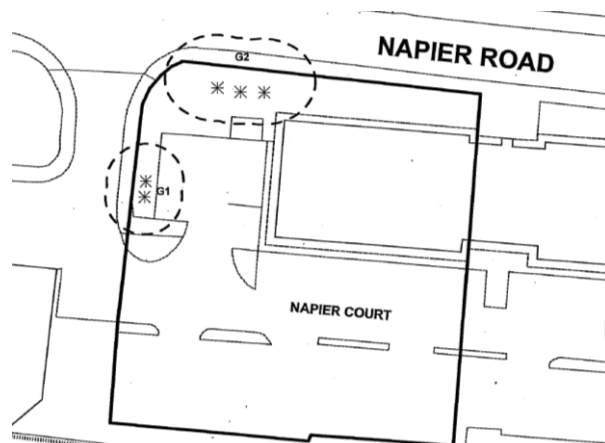
It is assumed that the Cleaning & Maintenance Strategy within the DAS also relates to access for green roof maintenance – the illustrations in 7.3 would appear to indicate this.

The Sun Path analysis in 7.15 & 7.16 indicates shading of the rear courtyard, pocket park and green roofs. I assume this is being looked at in more detail to ensure the amenity spaces are 'useable' and landscaping is not too shaded.

Trees (existing)

With reference to **Tree Retention & Removal plan RG-LD-100 P5 & Arboricultural Assessment & Method Statement Rev G dated June 2024 from FPCR Environment and Design Ltd**

TPO 13/10 include 5 Maples, separated into two groups:



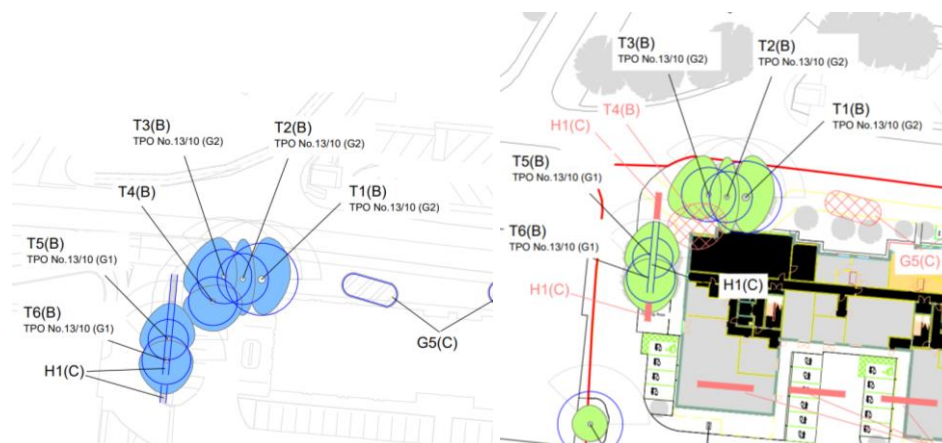
The DAS and Arb report acknowledge the TPO.

4.1 states that *'A total of seventeen individual trees, five groups of trees and two hedgerows were surveyed as part of the Arboricultural Assessment'*. Table 1 in 4.4 indicates that the individual trees are made up of 12 'B' category trees and 5 'C' category trees; with the 5 groups made up of 3 'B' category and 2 'C' category groups. T1, T2, T3, T5 & T6 are the TPO trees (all 'B' category).

Table 3 in 5.2 advises that the proposals require the removal of 6 'B' category trees, 4 'C' category trees, full or part removal of 2 'B' category groups and 1 'C' category group (no tree numbers given), along with full/part removal of two hedges. Hence removal of 10 individual trees, removal of 3 full/part tree groups and full/part removal of two hedges. Given the lack of clarity on the number to be removed (due to unspecified 'part' removals), a net gain has not been demonstrated with the landscaping.

5.4 advises that a new 'tree friendly' path will be constructed within the RPAs of the TPO trees and that *'Facilitation pruning will be required on T1, T2, T3, T5 and T6 [the TPO trees] to allow sufficient room for construction purposes'* and further works to these trees is specified in Appendix C1 – discussed further below.

Focusing on the protected trees on the west side, a comparison of their relationship with the existing building footprint and proposed can be seen when comparing the tree survey drawing and tree protection plan:



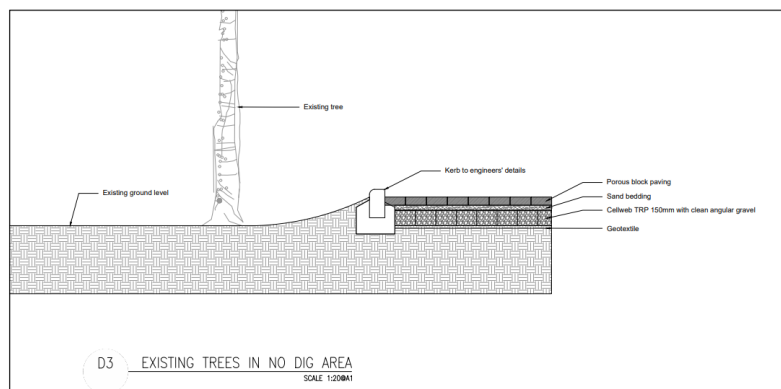
It can be clearly seen that the proposal is considerably closer to the trees than the existing. The proximity is demonstrated by the acknowledgement of the need for facilitative pruning, which goes beyond minor branch pruning, with overall crown reductions being proposed in Appendix C1. The fact that this work is required to create a sustainable relationship indicates that the proposal is too close and hence unacceptable.

In addition, there is likely impact on the RPA of T1 at least. In the first instance, the circular RPAs are questionable given the adjacent structures and hard surfacing – the RPA of T1 presented as a circle includes the corner of the existing building, which is unlikely to form part of the rooting environment. Even if the RPAs were an accurate representation, the proposed building is right on the edge of the RPA (as currently shown) of T1 meaning that to construct foundations will involve impingement into the RPA. This is somewhat glossed over in the Arb report, with Appendix C3: 'Excavation Under Supervision – Working Methodology', stating that: *'Due to the requirement for excavation within the root protection areas of T1, T2, T3, T5 and T6 it is not possible to use "no-dig" construction for all proposed works. The cutting of roots shall not entirely be avoidable during the removal of existing ground material to construct the certain parts of access*

road and residential plots' It goes on to state how this would be done to minimise damage but makes no comment on the acceptability of this, as I would expect in an AIA.

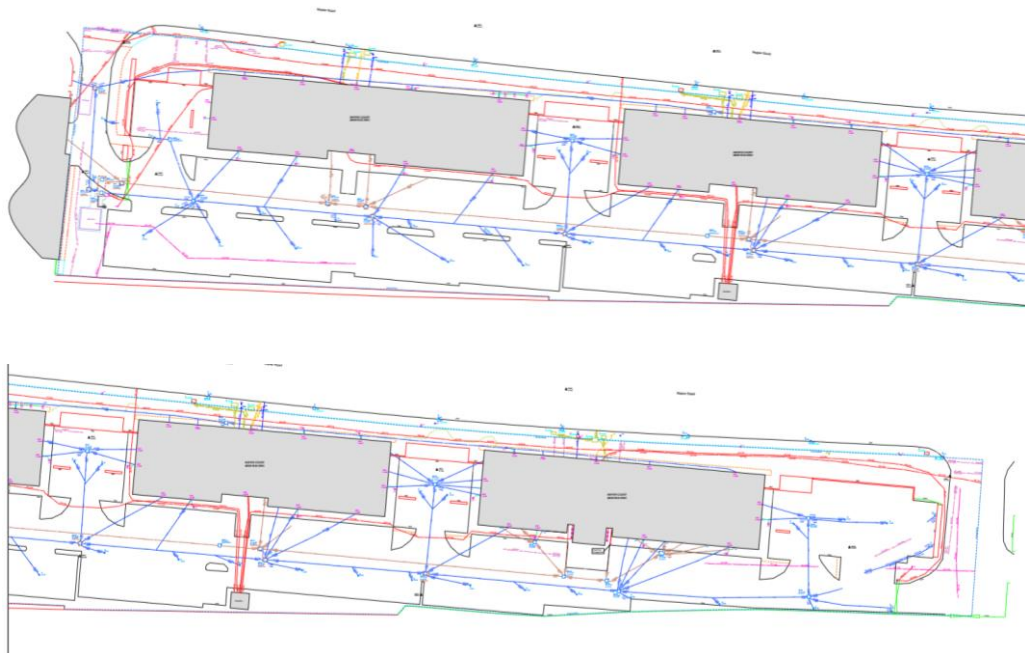
With regard to the new hard surfacing, Appendix C4: 'Supervision of Uplift of Existing Hard-standing – Working Methodology' focuses on the removal of hard surfacing, with no mention of other structures.

In relation to the construction of new hard surfaces within RPAs, only the principles are provided with Landscape Typical Details_Planting RG-LD-400-1 P4 showing the pavement make-up around retained trees, as below:



This is insufficient to understand how this will be actually achieved, including marrying levels, in the areas shown below:





These needs to specifically be considered alongside landscaping proposals, together with proposed service routes indicated in the **Utilities Statement ref: T2223208/SEL/001** (plus any others) to demonstrate that the landscaping, as currently shown, can feasibly be implemented.

I note that **DRAINAGE STRATEGY PLAN SHEET 1** has been provided showing the drainage strategy for half the site.

7.3.18 of the document states: *'However, additional capacity is proposed to be incorporated through the use of additional localised SuDS features within the soft landscape and rain garden areas'*. However, no rain gardens are proposed and it is unclear how the drainage strategy is landscape led (the default required re EN18) given the lack of blue-green roofs, rain fed tree pits and attenuation tanks from which water can be pumped to maintain landscaping. Alongside the issues with provision of the required electricity supply (mentioned in submissions), there appear to also be issues regarding foul sewer/water provision. Measures should therefore be designed to reduce the amount of potable (treated, drinking quality) water needed for landscaping maintenance and to reduce the amount entering the sewer system.

Conclusion

The proposals fail to demonstrate no harm or future pressure to fell or prune protected trees of high amenity value. Proposals also fail to demonstrate appropriate landscape provision and its feasibility. The proposals are therefore contrary to EN14 and to Reading Borough Council adopted Tree Strategy 2021.

Not supported - objection