

Memo

To: Gary Miles, Planning

From: Amy Daly, Assistant Natural Environment Officer, Planning

CC:

Date: 3rd April 2025

Re: Consultation on an Application

Planning Application Ref: PL/25/0342

Application Type: Full planning permission

Address: Thameside Primary School, Harley Road, Caversham, Reading, RG4 8DB

Proposal: Proposed upgrades to (Special Educational Needs and Disabilities) SEND play equipment and new 3m security fencing to enclose the proposed play area within the existing site boundary, following demolition of existing play equipment.

Thameside Primary School is located within an AQMA. It does not lie within a Conservation Area, nor does it have any TPO's present on site. Conclusions have been drawn upon analysing the Arboricultural Impact Assessment for SEND Space at Thameside Primary, 28th February 2025, Ref: PB/AIA-25/01.09, the Design and Access statement and existing plans.

With reference the Design and Access statement and AIA, it is proposed that T1 is removed as it is in falls within the area for the new playground. This tree is placed in category B and it is stated that removal '*will have a minor loss of amenity locally and no negative impact on the wider landscape character*'. However, removing a category B tree is not ideal, as it goes against the BS5837 recommendations. As this is an AQMA, replanting is required. Ideally 3no. specimens should be replanted in line with EN14 but specifically in relation to Council replacement planting and Tree Strategy aims. There is certainly room for this to take place but would be best demonstrated in a landscape plan. In section 6.2 of the AIA, it is stated that '*There are no landscape reasons to mitigate the loss of this tree*', contrary to this, replanting does need to take place to meet policy requirements and aims of the Tree Strategy

The development also takes place within the RPA of all 5no. of the remaining trees. This requires an Arboricultural Method Statement to be submitted to show how harm is going to be minimised to the retained trees, as per the AIA recommendations. This is important as the BS5837 2012 states, "*To avoid damage to tree roots, existing ground levels should be retained within the RPA. Intrusion into soil (other than for piling) within the RPA is*

generally not acceptable'. So, in order for this to be acceptable, evidence is needed to show that RPA's are going to be respected. Also, within accordance with the BS5837 2012, *'New permanent hard surfacing should not exceed 20% of any existing unsurfaced ground within the RPA'*. With reference to Table 1 within the AIA, it shows that the construction of Wetpour surfacing will encroach on 21.5% of T2's RPA as well as 33.6% of T6's RPA. With reference to the existing plans and Table 1 of the AIA, there appears to be soft landscaping within these RPA's, which are proposed to be replaced with hard landscaped surfaces, but it is difficult to assess the surface type percentage change. The impact of this may be mitigated with an AMS, but this is generally not acceptable.

According to the Design and Access statement, *'the 3m high fence proposed to surround the site for safety reasons will encroach onto the RPAs of T2, T3 and T5. Approximately 7no. fence post footings with associated foundations will be required to be located within the RPA of trees T2-5. Additionally, 1 no. Play equipment structure (bird's nest swing) will require 4 no. Post footings, 2 of which are to be located on the boundary of the assumed RPA of T2, T3 & T5, and 2 of which only within the boundary of the RPA of T5'*. The footings are not plotted on the TPP within the AIA, so it is inconclusive to where they lay in the designs and RPA. The BS5837 2012 recommends that *'To avoid damage to tree roots, existing ground levels should be retained within the RPA. Intrusion into soil (other than for piling) within the RPA is generally not acceptable, and topsoil within it should be retained in situ. However, limited manual excavation within the RPA might be acceptable.'* If roots are over 25mm in the areas in which the post footings are found, there needs to be an alternative plan for where the footings can be placed to minimise harm, as severing roots over 25mm isn't acceptable.

The AIA also states *'There is no requirement for crown pruning to facilitate the development works'*, so it is assumed there is enough clearance between the tree canopy and the ground, that the fence can be installed without coming into contact with tree branches. This should be checked in the final AMS.

In conclusion, L1 would be applicable here as there is going to a reduced amount of trees and soft landscaping, with an increased amount of hard landscaping. A pre-commencement scheme of hard and soft landscaping should be submitted (note that L1 currently states 'pre-occupation'). As a tree in an AQMA, on Council land, is being removed, replanting should be implemented in a suitable area. In addition, some other soft landscape features would be beneficial here, hence the need for a landscape plan. L3 also applies, a plan indicating the positions, design, materials and type of boundary treatment to be erected needs including as new fencing is being proposed and submitted plans lack clarity. Condition L7 is also applicable in relation to protecting retained trees with an AMS, and in accordance with EN14 of Reading Borough Local Plan 2019 and adopted Tree Strategy.