

Response to RBC Planning Officer Comments

Please see in the document below the list of conditions and associated RBC comments. All responses from the Applicant/Consultant will be noted in **Blue** or **Green** and all relevant documents will be referenced and attached to the correspondence as part of the response.

Condition 9 (EV Charging Points)

The RBC Transport Development Control Manager has commented as follows:

The proposed drawing illustrates 2 EV charging locations in calculation area 1 (north-west corner of the site) that are not highlighted blue but may still create confusion. I would suggest that reference to these is removed from the drawing but I would not object to the discharge of condition should these be retained.

Condition 9 (EV Charging Points) - Applicant/Consultant Response

The applicant has confirmed that the 2 EV charging locations in calculation area 1 (northwest corner of the site) will not be provided. This was a graphical error on the previously submitted drawing.

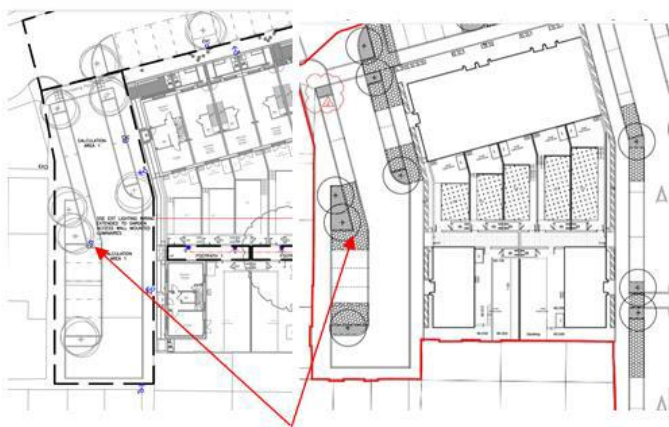
Please find attached revised drawings that remove these highlighted areas from the plan and address the comments noted above. Revised Drawing:

- **EV Parking Strategy locations (RBC-WLR_HTA-A_XX_00_DR_0132 - Rev. B)**

The RBC Natural Environment officer has commented as follows:

First Comment:

My previous memo highlighted one particular location (as below) in relation to the conflict with root cells and queried why all e-duct routes were not shown.



In response, the applicant has provided revised Electric Engineering drawings (I note the drawings don't reflect latest trees planting proposals):

2131-NBP-XX-XX-GA-E-140 C20 Sheet 1 of 3)

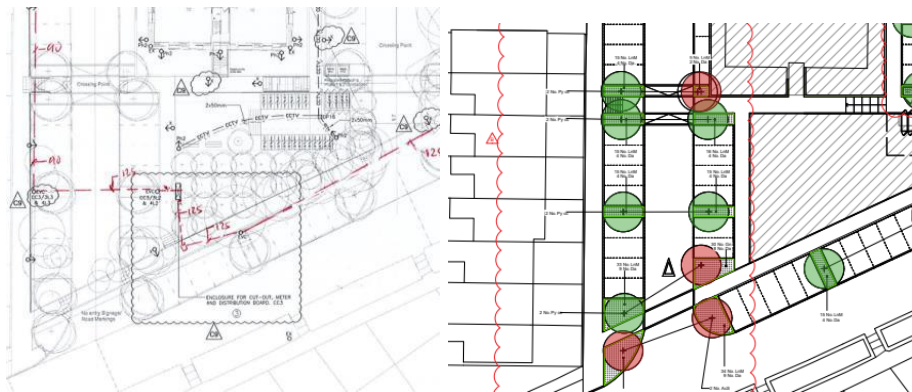
2131-NBP-XX-XX-GA-E-141 C22 (sheet 2 of 3)

2131-NBP-XX-XX-GA-E-142 C20 (sheet 3 of 3)

In relation to the location shown above, as included on 2131-NBP-XX-XX-GA-E-140 C20, I note the particular EV charging point has been omitted, which I assume is acceptable with Transport. However, the drawing still has text stating 'electric car charging points' in this car park area when none are shown, which is confusing and which should be removed if none are proposed.

Second Comment;

In addition to the above plans, 3 'EV ducts' drawings have been provided (hand drawn on the External Electrical Site Services layout sheets 1-3). These appears largely acceptable, with the e-routes going to the rear of pavements and not through tree pits. The exception to this, which needs reconsideration, is south-west or Irving Court where the duct appears to go through 2 tree pits:



Why can these not go under a park space (in this case to the north given root cells to the south of the trees) to avoid the soft landscape strip?

Condition 9 (EV Charging Points) - Applicant/Consultant Response

First Comment

Regarding the EV charging located to the north-west of the site, as noted in the response to the Transport consultant, the EV charging for this location has been removed, eliminating any potential conflict with the root cells in this area. We have submitted a clear drawing showing the provided EV charging locations to clarify the positioning of both the EV spaces and tree locations. Revised Drawing:

- EV Parking Strategy locations (RBC-WLR_HTA-A_XX_00_DR_0132 - Rev. B)

Second Comment

*Regarding the ductwork shown south-west of Irving Court where ducts were indicatively shown through the root cells on the drawing - this was queried with the applicant who has confirmed that the duct routes **have been built and do not pass through the tree pits, but instead run directly through the car spaces.***



Condition 15 (Bus Stop Details)

The RBC Transport Development Control Manager has commented as follows:

The Highway Authority are happy that the previous shelter is to be reinstalled on site however the condition can only be part discharged given that the shelter has not been installed as yet.

The RBC Natural Environment officer has commented as follows:

I note the intended re-use of the bus shelter removed and the applicant's comment (in relation to a potential green roof shelter) that:

'The bus stop with a green roof was considered by the client, but was ruled out due to prolonged lead in time and associated costs, due to the reasonable condition of the existing shelter the decision was made to reuse the removed shelter for the site'.

The project has been ongoing for years, so I don't understand the 'lead in time' comment. In any case, re-use in this case seems reasonable in terms of cost effectiveness.

Condition 15 (Bus Stop Details) - Applicant/Consultant Response

The applicant acknowledges the comments provided by both the RBC Transport Development Control Manager and the RBC Natural Environment Officer in relation to Condition 15.

With regard to the Transport Development Control Manager's comment, we note that the previous shelter is acceptable for reinstatement, and we understand that the condition can only be part discharged at this stage, pending physical installation on site. We confirm that arrangements for the reinstallation of the shelter are in place and that it will be reinstated in accordance with the approved plans as part of the site completion works.

In respect of the Natural Environment Officer's comments, we would like to clarify that while the project timeline has been extended, the decision regarding the potential provision of a green roof bus shelter was made relatively recently in line with the evolving programme for final site works. At the time of decision, the procurement and installation lead-in time for a bespoke green roof shelter was assessed against the project programme, budget constraints, and the condition of the existing shelter. On balance, and to avoid further delay and cost escalation, the decision was taken to reuse the original shelter, which remains in a good and serviceable condition.

We trust this clarifies the applicant's position and the rationale behind the approach taken.



Condition 24 (Boundary Details)

The RBC Transport Development Control Manager has commented as follows:

The Highway Authority are happy that this condition can be discharged.

The RBC Natural Environment Officer has commented as follows:

Condition 24 states; Prior to the first occupation of the development hereby approved, a plan indicating the positions, design, materials and type of boundary treatment to be erected, shall be submitted to an approved in writing by the Local Planning Authority. Where appropriate the boundary treatment shall include the provision of mammal gaps. The boundary treatment shall be implemented in accordance with the approved plan before the development is occupied or otherwise in accordance with a timescale agreed in writing by the Local Planning Authority and shall be retained as such thereafter.

Reason: In order to protect the privacy of adjoining and future occupiers and in the interests of the visual amenities of the locality and local wildlife in accordance with Policy CC7 and EN12 of the Reading Borough Local Plan 2019

I previously stated: 'As per Ecology comments, none of the above show any mammals gaps which should therefore be included (positions and size) unless sound reasons for omission are provided'.

In response, the applicant advises:

Please note, the Submitted Plans (Boundary Treatment Site Plan Pages 1 to 3 (RBC-WLR_HTA-A_XX_00_DR_1120 rev E, RBC-WLR_HTA-A_XX_00_DR_1121 rev E, RBC-WLR_HTA-A_XX_00_DR_1122 rev E) have been updated to note the inclusion of mammal gaps in the garden wall types and their general locations. Additionally, a Garden Wall type drawing (RBC-WLR_HTA-A_XX_SE_DR_8050 rev B) has also been submitted to show construction detail and to cross reference the boundary treatment plans.

Exact location and position of the Mammal gaps would need to be observed on site.

I note that GS Ecology have accepted these in their email of 25/3/25 and Transport DM in their email of 31/3/25. I'm not sure what the last sentence means but assume installation will be checked.

Condition 24 (Boundary Details) - Applicant/Consultant Response

The applicant acknowledges the comments provided in relation to Condition 24.

We note that the submitted Boundary Treatment Site Plans (RBC-WLR_HTA-A_XX_00_DR_1120 Rev E, RBC-WLR_HTA-A_XX_00_DR_1121 Rev E, and RBC-WLR_HTA-A_XX_00_DR_1122 Rev E), together with the Garden Wall Type drawing (RBC-WLR_HTA-A_XX_SE_DR_8050 Rev B), have been reviewed and accepted by both GS Ecology (email dated 25/03/2025) and the Transport Development Control Manager (email dated 31/03/2025).

The inclusion of mammal gaps has been noted on the updated plans, with general locations indicated. We confirm that the built position and installation of the mammal gaps can be checked on site. Should the consultant wish to review these positions, the project team can organise a site visit at a convenient time.

We trust this provides sufficient clarity and are happy to assist with arranging any further inspections as required.



Condition 25 (Landscape Management Plan)

Please note that the latest response from the HTA Landscape Comments is stated in Green.

Please find attached revised reports address the comments noted below. Revised Drawing:

- **5 Year Landscape Management Plan (RBC-WRL-HTA-L_SP_1700 - Rev. B)**

The RBC Natural Environment Officer has subsequently commented as follows:

Condition 25 states; Prior to the first occupation of the development hereby approved, a landscape management plan, including long term design objectives, management responsibilities, timescales and maintenance schedules for all landscape areas, other than privately owned, domestic gardens, shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall thereafter be carried out in accordance with the approved details and for the period specified.

Reason: In order to ensure that provision is made to allow satisfactory maintenance of the landscaping hereby approved in accordance with Policy CC7, EN12 and EN14 of the Reading Borough Local Plan 2019.

I raised four points with the LMP previously submitted. My comments and the applicant's responses (in blue) are below to which I've added further comment in red:

- 5.2 'New Tree Planting' lists one of the reasons for pruning as: 'To reduce the risk of tree-related subsidence damage to buildings by limiting trees' foliage area and subsequent water demand'. This implies that either new build has not been designed with new trees in mind and/or that species have not been selected in view of soil type and foundations – is this the case? The pruning reason does imply, of course, that the soil is a clay type soil – is this the case? I also wonder who / how RBC are going to determine how much pruning will be required to prevent the potential risk as it is far from an exact science? Responses are required in relation to all matters raised.

HTA Landscape Comments: This is a standard note within our management and maintenance documentation. As with all projects, consideration of tree species and location has been a key part of the decision process, as well as following best practice guidance for planting and planting in relation to services and built structures. We are not aware of any specific issues with subsidence; however, it is not possible to rule out the occurrence of subsidence in the future on any site. As such we have made provision for this in the standard clauses.

I note the comment on species choice and location, which is positive and expected. However, the requirement of this clause in terms of pruning to reduce the risk of tree-related subsidence is not feasible in practice. The amount / size at which a tree should be retained is not known so there is no specific guidance for the management – it is an unreasonable expectation for the Council to take on (I have spoken to the arb contracts manager at RBC and he agrees). Subsidence cases, if they occur will be dealt with if/when they occur in line with normal procedure. (no comment on soil type is given, as requested, so likelihood has not been provided – confirmation of non-clay soil type could rule it out)

HTA Landscape Comments: HTA to remove note from management and maintenance schedule.

- 5.2 goes on to say that street trees should be removed if, along with other reasons: 'As a result of an insurance claim where evidence has been presented implicating a tree and no other practical steps are available to resolve the problems'. Comments as above. This is not a normal element to see included in a landscape management plan. Hence, I wonder if there is a high incidence of tree-related subsidence claims in Wensley Road? If so, considerable thought should have gone into tree selection and foundation design. Clarification and responses are required.

HTA Landscape Comments: Again, this is a standard note within our management and maintenance documentation. As with the point above it is not possible to rule out instances where a tree could be the cause of an insurance claim, as such again provision is made within the management and maintenance schedule to cover the possibility.

Why just 'street trees'. Again, this is not necessary – maintenance will be taken on by RBC



and if alleged tree relates subsidence occurs (no comment on soil type so likelihood has not been provided) it will be dealt with in line with normal procedure.

HTA Landscape Comments: HTA to remove note from management and maintenance schedule.

- *Typical 5 year Maintenance Schedule – largely acceptable, but it would be helpful to add some watering amounts for trees please?*

HTA Landscape Comments: This can be added to the management and maintenance schedule.

No revised LMP has been provided to include this.

HTA Landscape Comments: HTA to update LMP

- *Planting Schedule and landscape plans – the landscape plans, hence schedule I assume, are not consistent with that submitted under 231252/NMA which I assume are the latest planting plans (albeit I'm not clear where that application is at). Please clarify?*

HTA Landscape Comments: Please refer to the 231252/NMA schedules, which note the latest information.

This confirms that, as I thought, the LS plans in the LMP are not the latest hence a revised document should be provided once plans under 231252/NMA are agreed.

HTA Landscape Comments: Plans have been updated to most current



Condition 37 (External Lighting)

The RBC Transport Development Control Manager has commented as follows:

The submitted EXTERNAL ELECTRICAL SITE SERVICES LAYOUT drawings identifying the locations of all the lighting are acceptable and as such the Highway Authority are happy for the condition to be discharged.

The RBC Natural Environment Officer has commented as follows:

*Revised Drawings & report have been provided:
External Lighting Proposals (Rev. 10 - Dated January 2025)
2131-NBP-XX-XX-GA-E-140 C20
2131-NBP-XX-XX-GA-E-141 C22
2131-NBP-XX-XX-GA-E-142 C20*

My previous comments were that the plans showed trees to be removed, which was confusing, and didn't show the latest tree planting layout. The former point has been addressed but not the later. However as both Transport DM and Ecology are satisfied with the lighting, I won't pursue this point.

Condition 37 (External Lighting) - Applicant/Consultant Response

Based on the response and the review of the External Lighting Proposals (Rev. 10 – January 2025) and associated drawings (2131-NBP-XX-XX-GA-E-140 C20, 2131-NBP-XX-XX-GA-E-141 C22, and 2131-NBP-XX-XX-GA-E-142 C20) by the consultant team, we trust that this will satisfy the requirements for the discharge of this condition.