

Memo

To: Ethne Humphreys, Planning

From: Sarah Hanson, Natural Environment Officer, Planning

CC:

Date: 19 June 2025

Re: Consultation on an Application

Planning Application Ref: PL/25/0620

Application Type: Full planning permission

Address: Land adjacent to, 43 Upper Redlands Road, Reading, RG1 5JE

Proposal: Self-build erection of a single dwellinghouse, with associated access, parking and landscaping, including the relocation of a boundary wall and the removal of a bunker structure

Trees

As you are aware, a Section 211 Notice (tree works notice) was submitted in February this year (validated in March) for the removal of 26 trees in the rear garden, consisting of Ash and Sycamore (ref PL/25/0378, approved on 9/4/25).

As the removals were being proposed outside of any planning approval or application, I questioned the necessity of proposing the removals separate to any planning proposals. The agent (same as for this planning application) confirmed the reason to be *'to facilitate the removal of a sub-surface structure which is causing restricted growth to the trees and an unlevel ground surface'* and *'bunker structure is to be removed as it is a danger to future residential occupation and has no heritage value'*. This implied that there was also the intention to remove the bunker outside of any planning application, for which I assume the agent was satisfied required no input from Planning (including the Conservation Officer). I note this current application description specifically includes bunker removal.

It is somewhat frustrating that this planning application was received such a short time (2 weeks) later, implying that the tree removals could have waited and have been dealt with as part of the application, negating the need for additional officer time to have been spent on the S.211 Notice.

As a result of the above, the **AMS ref PRI34678_ams_A and associated TPP** submitted is out of date and needs to be revised to take into account the S.211 outcome, which has been implemented (trees removed).

Following the request to the agent, the Tree Survey has been submitted which is also now out of date.

The AMS is insufficiently detailed with regards to the new / relocated wall on the west boundary (Section 19). This is within the RPA of the A category off-site Tulip tree and close to it. Given the importance of this tree, greater detail on the design of the wall foundations is required in the form of engineering input, minimising the excavated foundations (to minimise root loss, regardless of root diameter), i.e. use of lintels in long sections with minimal pads (in number and size). Without trial digs, there will have to be some flexibility for the hole/pad locations but I would expect changes couldn't be made ad-hoc on site due to the resulting structural impact. Further consideration is required.

I also note that the nearest parking space is within the RPA of this Tulip tree and is being dealt with by way of 'sensitive excavation'. The incursion is considered, in the report, to be minor, hence being dealt with by careful excavation and clean severing of any roots found. The comment on incursion is based on the BS5837 calculated RPA. However, we know from air spade excavations done in 2018 that the root spread far exceeded that predicted by BS5837. The diameter of the Tulip is given in the tree survey as 720mm, from which the RPA radius would be 8.7m (from Annex D of BS5837) and I assume that is what is represented on the TPP. In 2018, roots were recorded in excess of 12m from the tree. As a result, the AMS/TPP approved under PL/24/1296/APC showed the following:



However, this has not been taken into account in the current AMS/TPP, with no reference to no-dig / cellular confinement surfacing, hence reconsideration of the hardsurfacing specification and method of installation is required.

Some trees within G9, along with the whole of G8, are shown to be retained on the rear boundary. I assume this has been considered very carefully alongside the bunker removal to ensure it is actually feasible given that the G9 ones at least appeared to sit at a higher level, potentially on made ground, as shown in the photo below. Perhaps the situation is clearer now multiple trees have been removed (post AMS date) – has the arb consultant revisited?



Landscaping

The DAS indicates tree planting, along with a 'bird green wall' and 'bee bricks'.

The location of the 'bird green wall' is shown on **Eco Enhancement Plan PRI24678_66_A** and mentioned in **BNG Net Gain report PRI24678_BNG Rev B**. The specification for the green element does not appear to be given anywhere; with the Plan stating 'as per architectural drawing' – not sure which drawing that is? If we don't have these details, they should be submitted. (this green wall is not shown on the Landscape Proposals Plan)

I note that one of the hedgehog highway gaps is within the south end of the new brick wall (on west boundary), hence will have to be factored into its construction. I note the photo of a hedgehog gap included on the plan only shows a gap in a fence gravel board.

With reference to **Landscape Proposals Plan PRI24678-11C**, this includes the planting of 10 new trees consisting of 1 *Prunus avium*, 1 *Sorbus aria*, 2 *Prunus padus*, 2 *Acer campestre*, 3 *Malus sylvestris* and 1 *Acer campestre* 'Streetwise'. Taking into account the 26 trees recently removed, this does not provide a net gain in tree number as expected

and creates issues, particularly alongside the biodiversity loss highlighted by GS Ecology. Additional tree planting should be considered in the rear garden and could perhaps include some small/medium species trees to provide an understorey to the retained trees.

In addition, the proposed trees do not provide the diversity expected, using the 30:20:10 rule – no more than 30% from any one family; no more than 20% from any one genus and no more than 10% of any one species. Apart from the Sorbus (species and genus) and Prunus avium (species), the diversity exceeds these ratios. The Family certainly needs reconsideration as currently 70% of the trees are from the same family (Rosaceae).

The plan includes wildflower areas across the entire south boundary and part of the west boundary. However, these will be shaded by existing, retained trees and new trees (the number of which is to be increased) hence I question the feasibility of these. GS Ecology may be able to confirm.

As you are aware approval 210308 included a biodiverse green roof. For consistency, this current application could consider this on the small single-storey element at the rear (on which the green bird wall is proposed) and would also help compensate for the omission of the wildflower areas if these are not deemed as feasible.

I note the mixed native hedge across the south boundary and west boundary, with native shrubs against the latter (in the south-west corner), along with single species Hornbeam hedge on part of the east and north (front) boundary, which are all positive.

In conclusion, whilst the principle of development is established here, however, the current proposal is not supported on tree or landscaping grounds for the reasons stated above.