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Civic Offices
Bridge Street
READING
RG1 2LU

Our Ref L.448.025.EE

24th June 2025

Letter of response

Proposal: Application under Town and Country Planning Act 1990 (as amended) for Approval of Details Reserved by a Condition in relation to permission LPA ref. 200188 / Appeal ref. APP/E0345/W/21/3276463 (granted on 17/03/2022) varied under Section 73 of the Town and Country Planning Act 1990 (as amended) application number 231673 (granted on 27/03/2024) - to discharge condition 28.

At: 55 Vastern Road, Reading, RG1 8BU

Further to submitted details of a comprehensive scheme of hard and soft landscaping proposals planning application ref PL/24/1443, the Case officer and RBC Natural Environment Officer have requested further clarification on a couple of points as set out in this letter.

1. Inclusion of green roofs with PV panels.

The letter dated 20 May 2025 received from the Natural Environment Officer states as follows:

"As an aside, I do note significant areas of PV panels shown on the approved roof plans (under 231673) and wonder why these areas have not been combined with green roofs as the two are mutually inclusive."

The applicant has provided a response to some of the reasons to the above as follows:

'We have not gone down the path of combining PV panels with green roofs due to BSR objection on the high-rise buildings for potential fire risks. Dry vegetation on green roofs can be combustible, increasing the risk of fire spread, especially in combination with electrical components. Vegetation can shade PV panels, reducing their energy output, and can also create damp conditions that may worsen fire risks. Details of the PV proposals are submitted under a separate condition'.



Additional comments were received from the officer on 29 May 2025, stating as follows:

As you are aware, we have (as a department) sought specific CPD from green roof experts in order to be able to respond to regularly cited concerns about green roofs. With regard to the fire risk, a properly maintained green roof (as one would expect) would not have dry vegetation. Green roof vegetation need not be tall hence shading should not be an issue.

It is commonplace for roofs to include both PVs and some form of green roof – the two are mutually inclusive. This combination is widely accepted within the profession and by developers and it is expected that inclusion is considered. Further advice and to reassure the applicant on its suitability, advice can be obtained from GRO in their Biosolar guidance and also Fire Guidance

In addition advice can sought from The Green Roof Organisation (GRO), The Environment Partnership TEP - The Environment Partnership - TEP is an award-winning environmental consultancy supporting sustainable development within the UK and Ireland. or from specialists such as Design, Supply, Install & Maintain - Bridgman & Bridgman

Further input is therefore still required on the green roof provision (alongside PV panels)."

Applicant's response:

As you are aware, planning permission for the development was granted under permission LPA ref. 200188 / Appeal ref. APP/E0345/W/21/3276463 (granted on 17/03/2022).

During this approval process, Condition 26 was agreed requiring details of photovoltaics to secure measures to adapt to climate change, in the interests of visual amenity and to protect local context and character. As set out on the approved drawings, there was never any intention or requirement to install green roofs alongside photovoltaic panels.

I would expect that you would agree that the purpose of the condition is to approve the reserved details as approved under the planning application, not revisiting the planning approved drawings and strategy.

Furthermore, as you are aware, we have provided a structural statement from the structural engineers and ensured that the green roofs (where proposed) have been accounted for and can be delivered. Again, revisiting a planning strategy to introduce additional green roofs that have never been part of any planning proposals, structural calculations, costs and designs is not achievable at this stage of the project without significant structural upgrades and shouldn't be enforced as a standard practice.

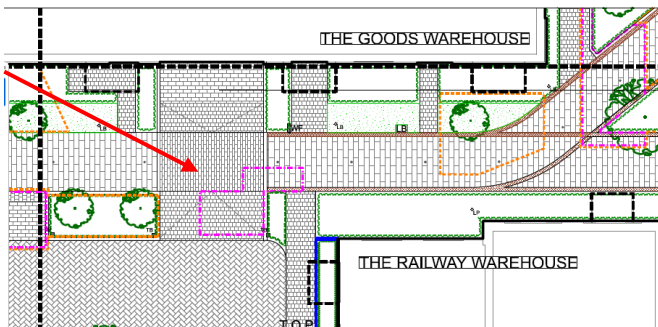
In addition to the above, we have also explained that the buildings are high-rise and subject to Gateway approval. Gateway Stage 1 has already been approved and is in line with the planning approved drawings granted under Appeal ref. APP/E0345/W/21/3276463. Gateway Stage 2 is imminent and is also following planning approved drawings, secured under the above approval. Any changes at this stage would be deemed as a major change to the project and would not be viable at this stage.

Based on all the reasons in addition to the previous responses, I would welcome your acknowledgement and agreement on this.

2. Root crates

Response received 29 May 2025 states as below:

"It appears to resolve this issue a section of root crate has been removed, as shown on Landscape GA Segment 6 0448-FIR10-XX-XX-DR-L-810-1006 P07 leaving a root crate area separate (the other side of the service corridor) to the tree pits – I'm not clear how the trees will then utilise this separated crate area, which is, in any case, crossed by approved drainage runs (see extract further below)."

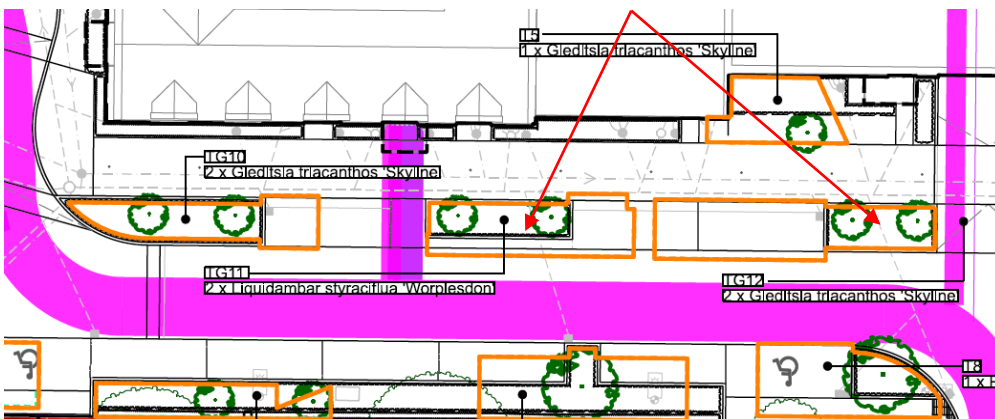


Applicant's response:

It appears to be a drawing mistake showing the additional crate. Please see amended drawing 0448-FIR10-XX-XX-DR-L-810-1006 P08 without the lines.

Officer's comment:

"However, there does seem to be a conflict with the drainage route, going through two areas surrounded by root barrier and through root crates, as indicated below:"



Applicant's response:

These are gully connections. In this instance, the gully runs identified will be deep enough that they will pass beneath the crated storage and not impact rooting volumes.

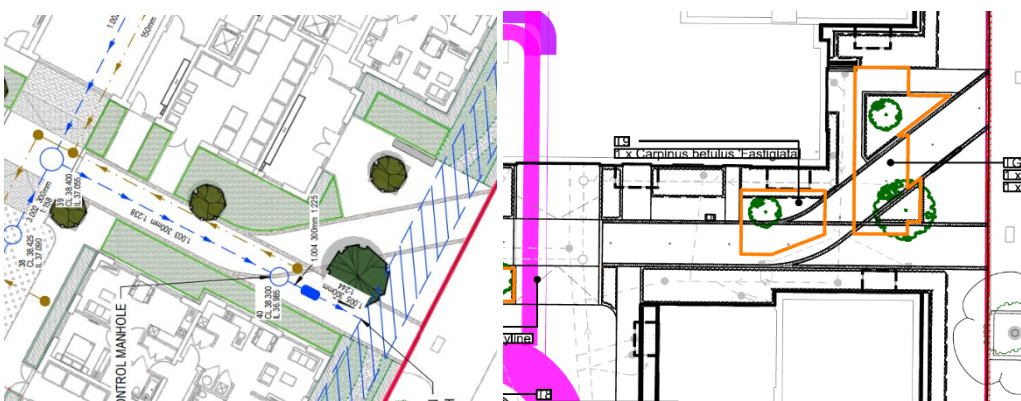
The tree pit details on drawing 0448-FIR10-XX-XX-DR-L-810-4001 are proposed to be 780mm deep. The level of the drainage and gully connection is between 1.2 and 1.4m below finish levels. I trust this provides you with enough information to see this clash will not cause any rooting volume issues.

3. Drainage Strategy

"I am aware that drainage was approved as part of the original consent (ref Proposed Drainage Strategy by Peter Brett Associates/Stantec Doc Ref R0001 Rev A dated 22/01/2020) but this does not seem consistent with the drainage routes shown above, with some routes not shown on the above plan (as indicated below):



The approved drainage shows this extending from the site to Vastern Road but this route is not shown on the Tree Pits Volumes plan and appears to create a conflict with the root crate / root barrier in this location:



Comment on this is required on the above given that Condition 14 requires drainage in accordance with the approved details."

Applicant's response:

We acknowledge that the drainage connection has changed from the original applications strategy.

Where water previous connected into the culvert on Vastern Road, it has been identified through detailed design that this connection was not favourable. As a result, the scheme now all flows towards the other outfall adjacent to the river.

The principles of the set-out drainage strategy follow the same route but adjusted closer to the buildings, reducing the pipe lengths to downpipes and the building's foul water connections. The reasoning for this update is that the further development of detailed designs (which weren't know at the planning stage) required coordination between drainage and other services and utilities.

The latest drainage drawings submitted under part e) of condition 28 are the accurate coordinated drawings.

4. Off-site ecological works

As per email received om 16/06/2025, the Case officer raised a query bellow:

"In relation to condition 44, GS Ecology are content that the off-site ecological works are acceptable from their standpoint in themselves. However, GS has raised a query that it is their understanding that you are required to consult the Environment Agency about the off-site reed planting you are proposing along the River Thames – can you please confirm and demonstrate your discussions / agreement with the EA in this regard.

I would also add to GS Ecology's comments by querying whether you have already received a separate flood risk activity permit from the EA Flood risk activities: environmental permits - GOV.UK for the off-site works? It would initially appear to me that this would be likely to be required and it would be beneficial for you to provide evidence of this being in place prior to discharging this condition. I would welcome your responses please."

Applicant's response:

We have submitted an EA application for the series of activities and our teams have been engaged with Environment Agency since starting on site. We can provide an email confirmation from Stuart Michael Associates Ltd that the application has been submitted.

Whilst the flood risk activity permit is underway, I fail to see why discharging the conditions in question should be restricted if the permit is not yet obtained. The planning conditions in question do not appear to require a Flood Risk Activity Permit under its wording.

It is also the sole responsibility of the developer or landowner to obtain the permit before starting any activity, therefore the Planning authority does not hold liability.

We would welcome further clarification and confirmation on the legal basis for withholding discharge.

5. Local resident engagement

As per email received on 16/06/2025, the Case officer raised a query below:

"In terms of your response in relation to further engagement from a local resident, I am disappointed that you appear to consider this unnecessary. I would have anticipated that you would have been keen to continue engagement with nearby residents and therefore repeat my previous offer of assisting in facilitating these further discussions (particularly as it seems it has not reached you). I would welcome your further reply on this matter."

Applicant's response:

I would like to confirm that throughout the application process, we have engaged consistently with local residents and stakeholders via the appropriate formal channels, and we are satisfied that those opportunities have been fully and fairly provided.

I appreciate your interest in continuing engagement and your offer to assist in facilitating further discussions. However, as previously outlined, we consider the engagement process on this matter to be complete and do not intend to pursue further dialogue with resident at this stage.

Should there be any additional matter that you might be aware of and that hasn't reached us, you are welcome to raise it with us.

We are grateful for the feedback received to date and remain committed to fulfilling our responsibilities through the relevant statutory and consultation processes should any further updates arise.

