

Jonathan Markwell
Principal Planning Officer
Reading Borough Council
Civic Offices
Bridge Street
READING
RG1 2LU

Our Ref L.448.026.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 26.**

At: **55 Vastern Road, Reading, RG1 8BU**

Further to submitted details related to photovoltaic panels, planning application ref PL/25/0383, the Case officer and RBC Natural Environment Officer have requested further clarification as set out in this letter. Some point were raised under a separate application PL/24/1443 relating to condition 28.

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).

Comment relating to condition 26 was received on 16 June 2025, stating as follows:

“How the PV panels interact with the green roof queries fed into you as part of separate approval of details application PL/24/1443 as part of the consideration of condition 28?”

The 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.

Yours sincerely,



Eva Erjavec RIBA
Architect

