

Consultee Feedback

RBC Natural Environment - Objection

Proposal: Proposed new MRI unit in a temporary modular building, for a period of 5 years

The site of Berkshire Independent Hospital is subject to TPO 175/06 and TPO 195/06 which includes the majority of trees on site, as shown in Appendix 3 of the AMS. There are several 'A' and 'B' category trees on-site, including a veteran Sweet Chestnut tree. The trees along the frontage contribute to the character of the street scene.

With reference to the Arboricultural Method Statement, July 2025, Ref: edp9335_r001a, I note the following:

1.6 states *'The development proposals are for the delivery, lifting and placement by crane of an industrial unit containing medical equipment within the Site.'* 3.4 states *'Overall, the items identified across the Site are primarily of moderate to high quality category A and B items. These category A and B items are located throughout the Site and so represent a constraint for any potential development activities'.* This recognises that the 'A' and 'B' category trees pose a constraint to the operations required to install the temporary structure.

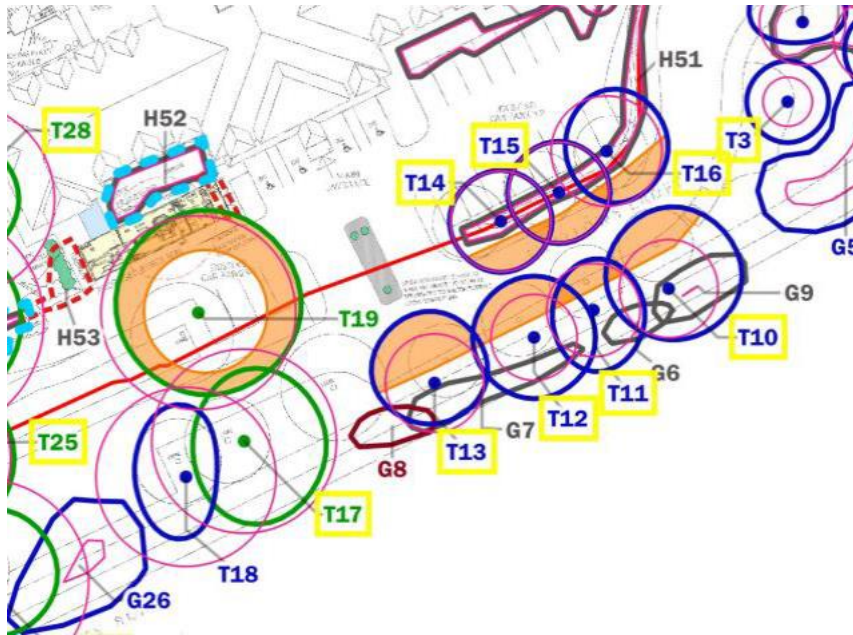
Table EDP 8.1 describes H52 and H53 as a *'partial removal'*, being unspecific in that it doesn't state a measurement of the hedge to be removed, making it difficult to appreciate the amount of vegetation loss. As sections of hedges are to be removed it is expected that this vegetation loss is mitigated, yet no mitigation is described.

7.7 states *'The tree stock within the Site is biased towards maturity and would therefore benefit from new planting to ensure succession to the tree stock.'* The report does not provide any further recommendations for this statement.

3.1 states *'1 item has been categorised as U and is considered unsuitable for retention'* yet doesn't propose this item (a group of trees) is to be removed.

8.10 *'These works will be required to facilitate the delivery, lifting and placement of the industrial unit. A proposed 4.5m clearance is required within the entrance of the Site. A*

diagram of this is requirement is provided within the Crane Working Area diagram (Appendix EDP 10) and will necessitate the crown reduction of T10, T11, T12, T13, T14 and T15 to achieve this clearance. The setting down of the unit will require the selective pruning of T19; this will be to the branches adjacent to the final location of the unit to allow for the required clearance.' The specifications for the canopy reductions are not mentioned in the report. However, they are shown in the Tree Protection Plan, 10th July 2025, Drawing No. edp9335_d002a, as the orange areas below.



T19 is an 'A' category, mature Hybrid Black Poplar tree. The TPP proposes a significant overall canopy reduction. I note that the tree has previously been pruned to form a pollard yet the works required are not described as a 're-pollard'. This would be an acceptable form of maintenance to the tree however clarity on the pruning specification is required.

T10-T16 are six 'B' category, early-mature Lime trees. The TPP proposes significant partial canopy reductions to all of these trees to facilitate the requirements for the crane access. A specific pruning specification has not been provided and no significant defects are recorded. The unclear pruning specification does not give us security or clarity of the true extent of the works. The Natural Environment Team are only supportive of significant canopy reductions where significant defects are present and that the trees structural integrity and stability are questionable. The extent of the canopy reduction

appears to be detrimental to tree health, appearing to be more than one third of the canopy removed which does not follow the BS3998 2010 recommendations. The proposed reductions will leave the trees with an extremely unbalanced canopy structure which is not justified.

I note 8.10 states '*A proposed 4.5m clearance is required within the entrance of the Site*' – it is unclear whether this clearance is needed from ground level or in width across the access path. I encourage that an alternative lesser pruning specification is proposed to meet with the clearance requirements, as the current clearance requirements are unclear and the proposed canopy reductions will have a detrimental impact to tree health. I note in an email sent from W H Bence (Coachworks) Limited it is stated that '*We would need full height clearance in the pick area, so no branches overhang the lift.*' and '*Tree cut back full width road & pavement to min 4.5m clearance*' – this appears to imply a crown lift to 4.5m for the full road width, hence would not necessitate the crown reductions indicated on the TPP. Yet this is not specified in the report and for reasons stated above it is not acceptable to prune the trees in such a way to achieve this. Clarity on the clearance requirements should be sought so that the impact of the crane operations can be fully assessed.

The trees mentioned above, alongside others, contribute to the street scene of Swallows Croft and Wensley Road. The proposed pruning poses a detrimental impact to tree health which will lead to tree health decline and death – resulting in the need for the trees to be removed in the future. The proposed pruning will contain them to a forever lesser size and lesser amenity value and risks the requirement to remove them in the future should they decline/die, negatively impacting the street scene.

To conclude, the Natural Environment Team object to this application. The extent of the works required to the six 'B' category early-mature Lime trees protected by a TPO are not justified to facilitate the installation of a temporary structure. The canopy reductions demonstrated in the TPP will remove a significant amount of the foliage from the trees and leaving them structurally sub-optimal. The pruning specifications are vague and offers us little clarity or security regarding the extent of the works. The impact to the trees will be permanent and detrimental and are not justified, particularly given the structure is temporary and no significant defects were recorded for these trees. The trees are protected and of high amenity value and supporting this application would potentially set an unwelcome future precedent to significantly prune TPO'd trees to facilitate developments. There is also no specified mitigation for the loss of hedges.

RBC Ecology – no objection subject to condition

The application is for a new MRI unit at the Berkshire Independent hospital located on Wensley Road. The MRI unit will be located close to the site entrance and remain in place for five years

Plans show that the unit will be located on an existing area of hardstanding.

There is however a risk that the proposal may affect nesting birds and as such a condition should be included within the decision noticed as follows

Condition: All trees, hedges and shrubs or similar vegetation where birds may nest which are to be removed as part of the development, are to be cleared outside the bird-nesting season (March - August inclusive) or if clearance during the bird-nesting season cannot reasonably be avoided, a suitably qualified ecologist will check the areas to be removed immediately prior to clearance and advise whether nesting birds are present. If active nests are recorded, no vegetation clearance or other works that may disturb active nests shall proceed until all young have fledged the nest.

Reason: To ensure that wildlife is not adversely affected by the proposed development in line wildlife legislation.

RBC Conservation officer – no objection on basis it is a 'temporary provision'

- The modern hospital building lies within the listed curtilage, which has been substantially altered in terms of its layout since the 1950s (along with the introduction of Wensley Road), according to the OS Map Regression. As such, the original eastern route/path of the Grade II Listed Coley Park House ([COLEY PARK HOUSE COLEY PARK HOUSE COLEY PARK LODGE, Non Civil Parish - 1113457 | Historic England](#)) is not legible today. Therefore, the location and position of the proposed MRI unit would have a potential impact on the setting of the listed building visually.

- Although the finish material for the proposed 'portacabin' would closely match the existing brickwork of the host building, due to its low-quality design and prominent position at the front of the main hospital building, it would have a negative impact on the host building and the visual setting of the listed building. This impact would be less on the setting of the listed building than on the hospital building itself.

- From the submitted Design and Access Statement, I noted that this new MRI unit would replace the existing one located inside the listed building. As such, this can also be considered as a little beneficial, subject to what is proposed for its place.

- Just because of the temporary nature of the proposed unit, it would have a reversible impact on the host building and the setting of the listed building. I would suggest submitting another application which considers alternative locations and better designs for the permanent structure/extension to the main hospital building. If the existing MRI unit is removed, then listed building consent would be required for the new works to the historic fabric.

- To sum up, no objection due to its potential beneficial impact on the significance of the listed building and temporary impact on the setting/listed curtilage.

RBC Environmental protection – no objection subject to condition

The noise assessment demonstrates that the noise from the plant including the MRI will be acceptable, however as mitigation is required as part of the works, a condition is required to ensure that the plant and mitigation are installed as per the noise assessment.

RBC Transport – no objection

This application relates to the delivery and installation of a purpose- built modular MRI unit at ground floor level constructed at the front of the Hospital located on the existing car parking area.

The new MRI Unit will replace the existing old MRI facility which is housed in the Listed Mansion building with the new unit being attached to the existing Hospital's Radiology department.

Four existing standard parking car parking bays will be lost as a result of this proposal bringing the total provision for the site to 107 standard bays and 6 disabled bays.

Given the medical facility has its own car park and the reduction in parking bays is limited and there is no detrimental impact on the Highway, there are no Transport objections to this application.