

Memo

To: Jonathan Markwell, Planning

From: Sarah Hanson, Natural Environment Officer, Planning

CC:

Date: 23 April 2026

Re: Consultation on an Application

Planning Application Ref: PL/25/1706

Application Type: Outline planning permission: Some matters reserved

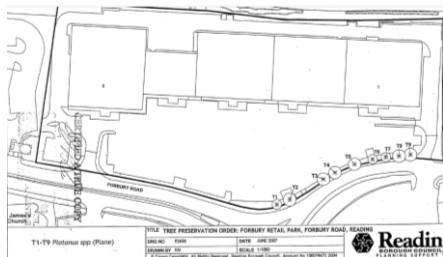
Address: Forbury Retail Park, Kenavon Drive, Reading, RG1 3HS

Proposal: Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, partial basement excavation, up to 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement.

The site has been subject to pre-application discussion, for which I gave input in 2021, and for an Outline application in 2023, where constraints relating to trees and landscaping were highlighted and expectations in relation to existing trees and landscaping made clear.

Constraints and policy considerations

Site is subject to TPO 205/07 which includes (at the time of service) 9 Plane trees on the Kenavon Drive frontage:



EN14: TREES, HEDGES AND WOODLANDS

Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced.

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

With reference to the **Tree Strategy**, the site is within the AQMA, borders the railway which is defined as a 'treed corridor', and is on a busy route hence tree planting is of greater importance to contribute to the aims of the Tree Strategy in increasing canopy cover and improving air quality (objective 4). In addition, new development is expected to have due regard to protected and other quality trees on site and result in a net gain in tree number (objective 11). Large canopy trees should be factored in and space provided to allow these for the greater environmental benefit they provide.

New development also provides an opportunity for creative greening for biodiversity benefits, e.g. green walls, roofs, soft SuDs, along with due consideration of water use – all supported by policy and the **BAP and Climate Emergency Action Plan**.

CR13b, FORBURY RETAIL PARK: *This site would be the focus of the new residential community, and, alongside residential, additional retail, leisure and community uses at a scale to serve the Kenavon Drive area would be appropriate. It should include a new area of open space and enhance the frontage to the canal, including a buffer zone to the top of the canal bank to reflect its wildlife significance. Implementing this policy may involve complete redevelopment or using new additional development to improve the existing urban form of the area. Some parts of the site are likely to be implemented in the long term.*

Water & SuDs

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

Proposals for new development, including the construction of new buildings and the redevelopment and refurbishment of existing building stock, will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.

To meet these requirements:

☐ *All non-residential development or conversions to residential should incorporate water conservation measures so that predicted per capita consumption does not exceed the appropriate levels set out in the applicable BREEAM standard. Both residential and non residential development should include recycling greywater and rainwater harvesting where systems are energy and cost effective.*

CC3: ADAPTATION TO CLIMATE CHANGE

All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into development:

☐ *All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change*

The aforementioned policies CC2 & CC3 refer to water conservation and minimising run-off. It should be remembered that the development (approx. 700 units) will significantly increase water usage (compared to existing) and significantly increase the production of grey water and foul sewer requirements. In addition, the landscaping will require water to ensure establishment and continued survival. Given that water is a finite resource that is likely to have control measures enforced in the future as a result of climate change (hotter, drier summers), added to the finite capacity of Thames Water to process dirty water, all development must include creative measures to minimise use of 'clean' water and reduce output into the sewers (which includes grey water) particularly in view of likely increased 'storm' events. Without this the borough as a whole (taking into account other significant developments) will have to cope with limitations on water supply in drought conditions, flooding, probable increased discharge of sewerage into water courses and failure of soft landscaping.

The drainage should be designed to harvest rainwater and direct this to water the landscaping; storing it for this purpose during high rainfall or when watering is not required (winter for example). Greywater could also be considered for this use in addition to/as well as recycling for use within the dwellings. Policy and aims of the adopted Climate Emergency Strategy supports these measures hence the applicant should consider their stance on this. The applicant confirmed their intention to consider water usage.

EN18: FLOODING AND SUSTAINABLE DRAINAGE SYSTEMS

'...Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology...'

Para 4.2.104:

Sustainable drainage systems aim to replicate natural drainage as closely as possible and minimise the impacts of development. In the first instance, schemes should consider the provision of SuDS through landscaping, with reference to Part D of the CIRIA SuDS manual, and in any case should consider the following:

- Integration with existing landscape;*
- Tree planting provision fed by groundwater runoff that functions effectively in place of attenuation tanks;*
- Additional capacity to cater for future development; and*
- Techniques including, but not limited to, permeable pavements, swales, basins, rain gardens, green roofs, rainwater re-use, infiltration trenches, ponds and wetlands.*

SuD's should be soft landscape lead with the inclusion of SuDs & tree pit combinations which has the added benefit of watering trees.

Landscaping

CC7: DESIGN AND THE PUBLIC REALM

All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located.

The various components of development form, including: -

- *Landscape;*

will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives: -

- *Quality of the public realm and provision of green infrastructure and landscaping*

Developments will also be assessed to ensure that they: -

- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*

EN9: PROVISION OF OPEN SPACE

Provision of green space with development - overview of requirements Policy EN9 provides for public open space in residential developments of over 50 dwellings.

However, there are a variety of policies that ensure that all new residential development within the Borough makes some form of contribution to green infrastructure, through:

- *Private and communal green space in accordance with Policy H10*
- *Landscaping, in accordance with Policy CC7, and linked into a wider Green Network wherever possible in accordance with Policy EN12;*
- *Innovative solutions in the high density town centre such as green roofs, green walls and roof gardens in accordance with policies CR2 and CR10;*
- *Tree planting in accordance with policies CC3 and EN14*

Adopted Tree Strategy 2021 – landscaping should meet the aims of Objectives 2, 4, 7 & 11 in providing a diverse, wildlife friendly tree palette, incorporating large canopy species, significant planting on the frontage and on the railway boundary (treed corridor and wildlife corridor).

The proposals

The proposal is for 'up to' 700 homes, therefore it is appropriate for the applicant to demonstrate that this number of units can be provided within all the constraints identified.

I note the development is to be referred to as 'Kings Meadow View' (KMV).

Planning Statement

5.102 states (in relation to the cycle route): *'This will route between the east and west site accesses, and route north of the TPO trees, although one TPO tree will have to be removed to facilitate the indicative cycle route and changes to the eastern access junction. the indicative cycle route could be delivered in accordance with the Parameter*

Plans, displaying a connection that will be made to the shared footway/cycleway along the northern edge of Forbury Road, routing north of the TPO trees. The eastern connection will require the removal of one TPO tree west of the eastern access. Further details will be provided via the reserved matters application'. However, I assume Transport will need satisfaction on this element prior to a decision on this application.

6.1.0 provides principles for the 'Landscape and Public Realm' which appear sound.

6.2.1 Planning Background makes reference to the 2010 Tree Strategy, which is no longer relevant. The 2021 Tree Strategy is referred to, which is the relevant document. I did point this out in 2023.

Design & Access Statement dated November 2025:

I note the statement that '*This DAS is not submitted for approval and all drawings and illustrations in this document are for illustrative purposes only*'. I assume, however, that separate plans submitted are consistent with the DAS indications and principles.

2.3 Landscape & natural features – does not mention existing, TPO trees.

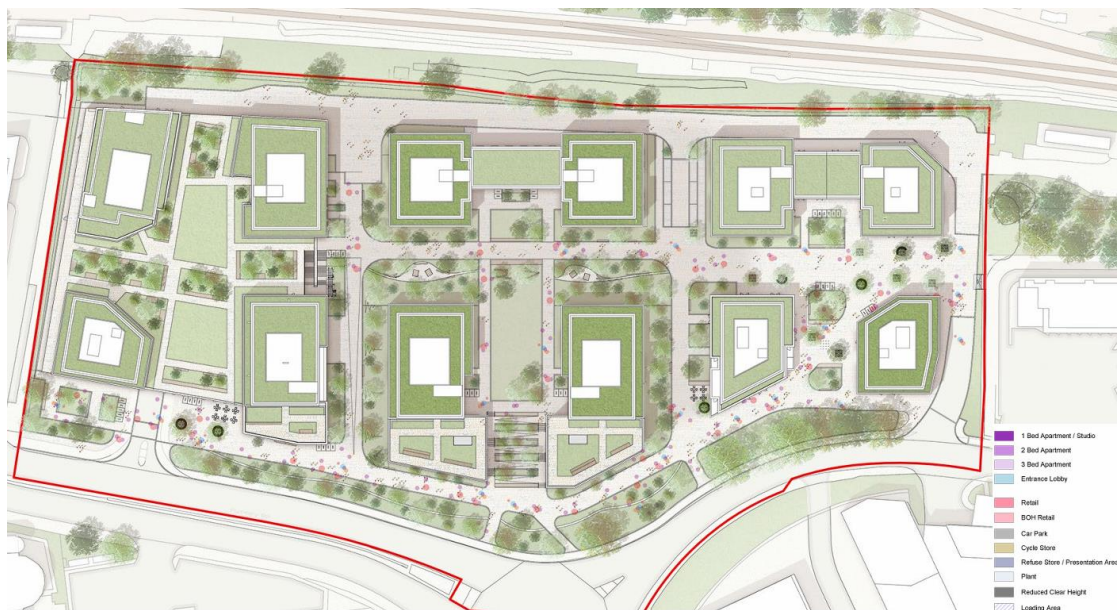
2.5.1 (Daylight and Sunlight) advises that: '*Key open spaces including Plummary Gardens to the South, and the East & West Courtyards, have been carefully coordinated with the landscape strategy to provide high performing spaces from a daylight / sunlight perspective*'. I will assume you are content that the relevant submitted report confirms this. This element was a matter for significant debate at pre-app to ensure the amenity space provision was adequate in this respect



May 2023 - Previous Submitted Scheme



Currently proposed Ground Floor Plan

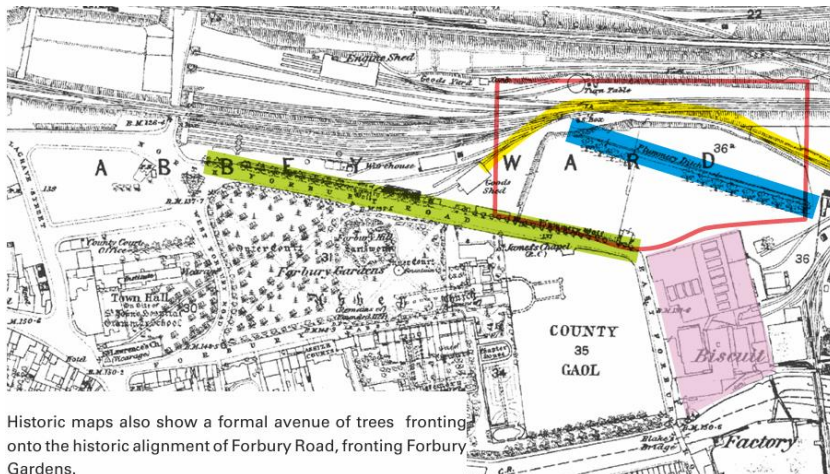


Roof plan

Whilst these are not labelled on the Roof Plan in 4.10.7 (P.113) of the DAS, I assume all green areas will be green roofs.

Illustrative views





6.4.1 includes 'key design principles', a few of which have a '*where possible*' caveat which as a concern as (from experience) it means that the applicant could argue at the reserved matters stage that it was not possible. However, as they have specifically stated that they are not seeking the DAS to be an approved document and I will comment further under the Design Code comments.

An Illustrative Masterplan is included on P. 157:



And on P. 159:



6.5.3 confirms the removal of one of the TPO Plane trees with ref to Stantec's Highway Design, which is shown on **drawing 50582-STN-HGN-SW-DR-CH-0011 P02** within **Appendix C of the Transport Assessment dated November 2025**:



I have discussed the above with Transport DM and understand that the loss is as a result of the combination of access widening to allow two way traffic and provision of the required cycle route through to the east and that the loss of the tree cannot be avoided. I note clarity is sought from Transport to confirm visibility splays Vs vegetation.

6.5.3 of the DAS refers to a survey of existing trees done by 'Treework Environmental Practice in October 2021 (refer to appendix iii for full report)' – this would be too old now so I assume an updated survey has been done. I can't find this appendix anyway. In any case, 1.3.5 of The Environmental Statement Volume 1 refers to an AIA and this is expected, as was made clear in 2023 comments. We have both requested this document during the processing of the current application but it has not been provided or any response to the request given.

A tree & vegetation removal plan is given in 6.5.4 and confirms the Plane tree removal, along with others:



The details of the trees to be retained and removed is provided in a table on P.165. This indicates that 22 individual trees and 1 group of 5 trees (total 27) are to be removed. The number of trees to be planted will have to exceed 27 to provide the required net gain, but I don't see that as being an issue within the proposals, as can be seen from the Illustrative Masterplan above, indicative plan on P. 167:



I note Ecology's comments below in which tree loss is not consistent with the above, hence clarity is required:

The BNG metric calculation itself includes a comment the line regarding 'Urban Trees' stating "34 small moderate trees at baseline/ 16 small- moderate condition trees to be

removed” and these 34 trees appear to be those along the southern area of the site (although the baseline habitat map shows 35 trees, which will also need to be clarified)

Indicative tree planting types are provided on P.161, albeit it's almost impossible to tell the difference between 'medium' and 'large' scale trees from this.



P. 162-163 provides a tree palette the applicant is considering. I've no objections to the inclusion of those shown, albeit the number of Lime should be limited due the over-representation of this genus in the borough. However, only 6 species are shown - I suspect considerably more will be required to achieve the required diversity ratio of 30:20:10 – no more than 30% of any one family; no more than 20% of any one genus and no more than 10% of any one species.

6.5.6 Planting - Plummery Gardens – given the water elements proposed in the zone, appropriate species have been chosen – Common Alder and River birch. This garden is the primary garden in terms of prominence and contribution to the street scene hence it would be disappointing not to include any large size species (height and spread). It is clear from sections in the DAS, that the water elements are confined to rills, hence it is unclear why the species chosen are necessary. It may be apparent once a greater explanation of the link between tree planting and the drainage strategy is provided – this is currently lacking.

6.5.7 Planting - Woodland Gardens – this includes Prunus, which the tree strategy identifies as being overrepresented in the borough hence should be reconsidered.

6.5.8 Planting - Green Streets – no tree palette given.

From the tree species / cultivars proposed, I am concerned that there appears to be a lack of large canopy species, the inclusion of which is supported by policy, the Tree Strategy and the Sustainable Design & Construction SPD.

6.5.10 Planting – Hedge – two tree species are given so I assume the intention is to plant a hedge with intermittent hedge trees, albeit this is not confirmed anywhere else? The native hedge with trees appears to be only in the rear, north-west corner, although the trees proposed don't fit with the 'small native or semi-native' trees indicated here on the plan on P.161 (above). I note this include Prunus avium – as a native and as long as too many are not incorporated (ref over-presentation) then it's acceptable.

6.5.11 gives details of the proposed biodiverse roof which I note are proposed alongside PV panels, which is positive. Species appear positive but I'll leave GS Ecology to confirm this and whether this type of roof is best for Black Redstarts – I note reference to inclusion of log piles in the Design Codes.

6.5.15 Sustainable Urban Drainage Strategy – the strategy refers to both biodiverse roofs and blue roofs, with the blue roofs being shown in the same location as the green/biodiverse roofs. It is confusing as to whether these are blue-green roofs as this term is not used. I would welcome clarity. In addition, this shows tree pits in hard landscape to be included in the strategy, however it is not clear how.

6.5.18 External Lighting Strategy – this includes tree uplighting. I have concerns if this is going to be on during all dark hours as 24 hour light is detrimental to trees, interrupting their natural cycle. This will need to be addressed – inclusion of motion detector lighting should be considered where safe to do so.

6.5.20 Soil Strategy – this is noted and as indicated, larger trees should be provided with a 1000mm depth of soil.

6.5.21 Public Realm and Daylight to Ground Requirements – it is noted that there is a significant amount of the amenity space receiving less than 2 hrs sunlight in the March assessment. You may consider that this is acceptable as other areas are available that improve on this.

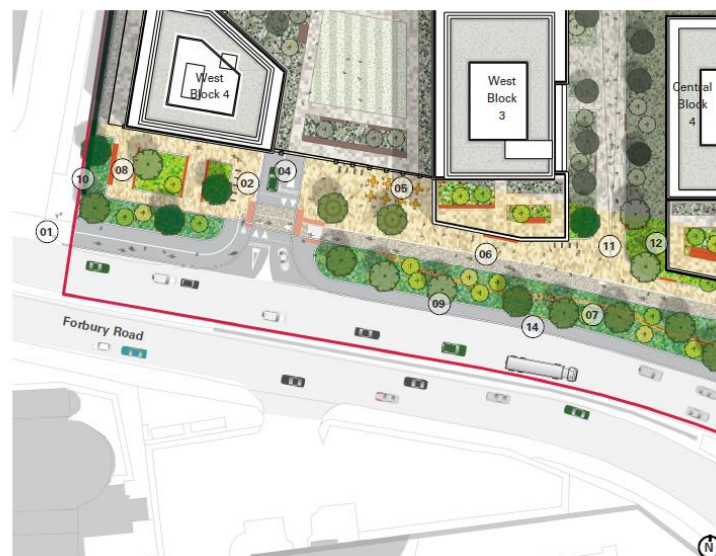
6.6.1:

Plummary Gardens will form the primary public space along the southern frontage of the development linking the Railway Station and Forbury Gardens to the west and Huntley Wharf, and future development plots to the east.

Size
Circa 250m long (development Frontage) and 10m-20m wide including pavement on the north side of Forbury Road

Use and Function
Shared cycle and pedestrian route
Linear Public Space providing a new frontage and address for the development

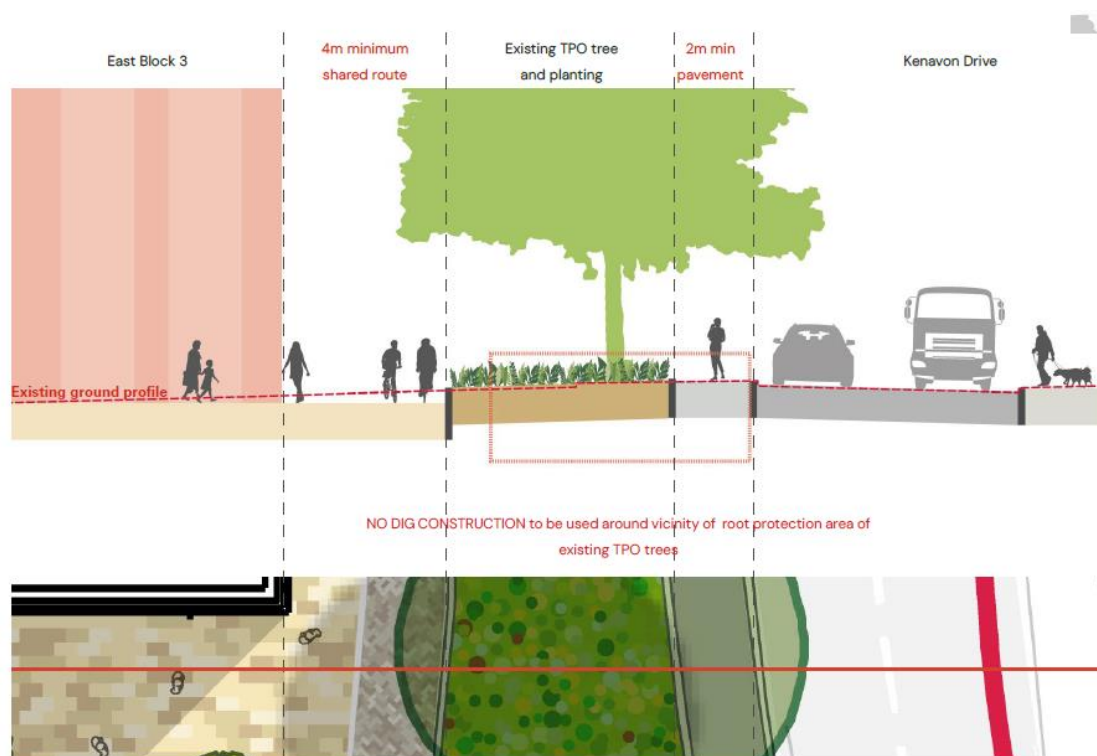
1. Connection to cycle network
2. Cycle stands
3. Access to Central Yard
4. Access to car parking
5. Retail breakout
6. Main route, Maintenance and Fire Access
7. Rain garden
8. Garden Rooms
9. Large scale street trees
10. Hedge
11. Threshold space to green street
12. Planting to buildings
13. TPO trees retained
14. Pavement to highway
15. New crossing
16. Vehicular Access





These indicate ‘large scale street trees’ (point 9) but no large canopy trees are proposed in the tree palette.

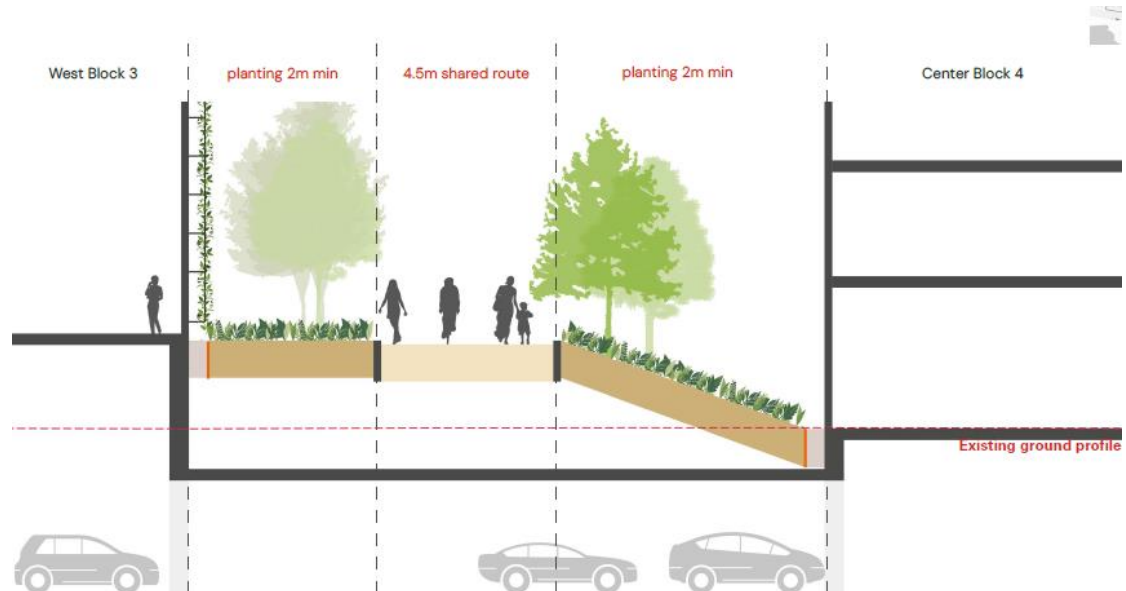
The section through relevant to the frontage of East Block 3 shows the following:



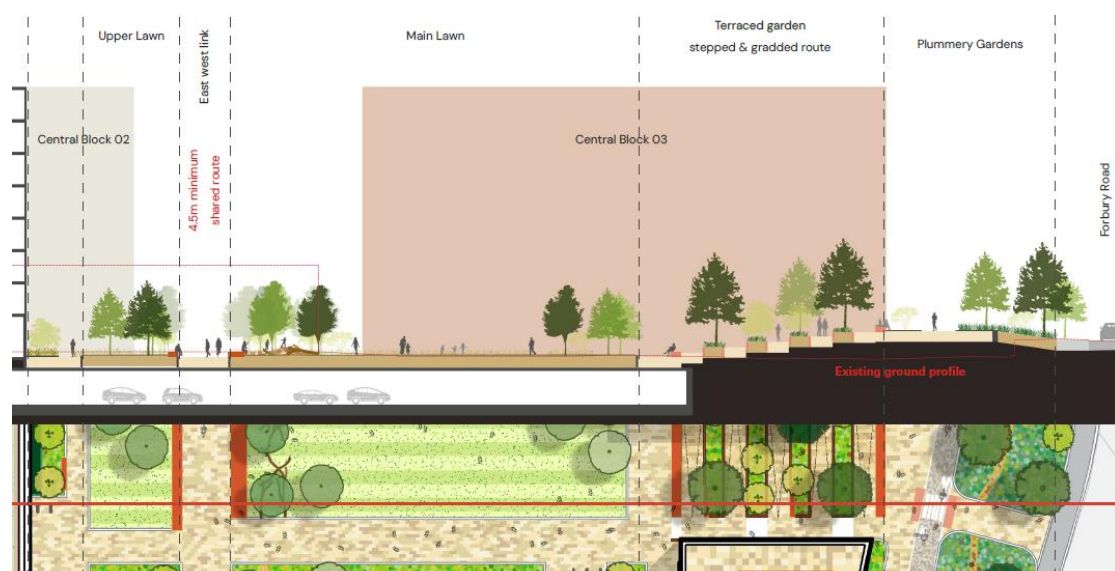
This both shows the existing ground level within RPAs to be lowered AND specifies a no-dig construction. Clarity will be expected on this prior to a decision – as I requested in 2023. The lack of AIA does not help to assist on this point. Such sections are not unhelpfully not included in the Design Codes.

6.6.2 Eastern Square – I would suggest that there is scope to include more 'large scale street trees' than just the one shown.

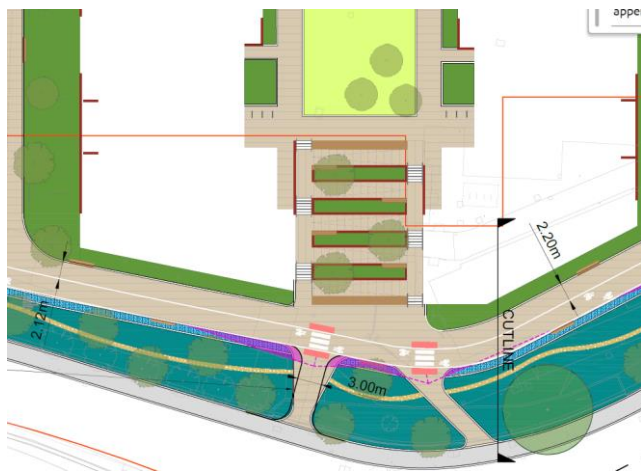
I note the gradient of the land as shown on P.210 & 211 between West Block 3 and Centre Block 4 and assume this is necessary – it is less favourable for tree establishment to be on sloped ground and this will need to be addressed in future landscaping specifications and maintenance details:



6.6.5 further demonstrates the challenges of levels across the site which demonstrates the need to consider and soil volume provision carefully to ensure every tree has a sufficient rooting volume:



On this point of soil volume, I note the steps up & ramp shown on drawing **drawing 50582-STN-HGN-SW-DR-CH-0011 P02 within Appendix C of the Transport Assessment dated November 2025** between Center Blocks 3 & 4:



The ramp seems to provide a long, winding route to access the upper level, with tight corners which does not appear user friendly to buggies or wheelchairs. I assume comments from the accessibility officer have been sought on this. Previous comments within the Urban Design Review from Doyle Design LLP (2023 application) queried whether lifts could be considered on this site (as per Station Hill). The benefit of this would be ease of access, compared to the ramp and would then allow reconsideration of the landscaping here, along with soil volume. If it's more likely that those needing the ramp would use the more level access to the east, is the ramp superfluous?

6.7.6 Western Court – this indicates the use of ‘semi-mature’ trees. On a general point, we would not push for this stock size as they come with a greater carbon footprint and require more water (a limited resource) to establish. A smaller stock size would be acceptable and preferable in sustainability terms (I reiterate this within the Design Code comments below).

6.6.7 Boundary Conditions & 6.6.8 Boundary conditions north – these only refer to hedge planting on the rear boundary, whereas incorporation of trees will be expected, as indicated earlier in the DAS.

6.7 includes Maintenance and Management Principles:

With reference to 6.7.2 Outline Landscape Maintenance - Year 1, this states that tree works will be done in September / October to avoid bird nesting. However, autumn (October-Nov), i.e. immediately before and during leaf fall, is not appropriate for significant works to trees. ‘Watering as necessary’ is not a sufficient specification. Tree replacements are specified in Jan-Feb – whilst this is part of the planting season, the season runs from Nov-March and planting earlier in the season allows plants to settle prior to spring. In relation to shrubs, the same comments on watering and replacement timing applies. I’m unclear why replacement for climbers are specified as being planted outside the planting season?

6.7.3 Outline Landscape Maintenance - Year 1-20 – same comments as above for tree works to existing trees. There is no inclusion of re-mulching, as would be expected. I note replacement planting ceases after 5 years. This is a 20 year management plan, hence I would expect replacement planting to be ongoing.

I’m unclear why maintenance and management principles have been included here and not in the Design Codes, given only the latter is sought for approval.

The applicant does not wish the DAS to be an approved document, providing it for 'illustrative purposes only', but the Design Codes should include principles within the DAS and be consistent.

Environmental Statement Volume 1 Main Report, dated November 2025:

1.3.5 includes an AIA in the list but one has not been provided.

2.2.2 acknowledges adjacent the railway designated under EN12 as AofBA hence supports the planting along the rear boundary.

The AQMA acknowledged in 2.3.4, again supporting a net increase in planting to improve air quality.

Biodiversity - acknowledges a TPO on 'a number of trees' and 'some tree loss'.

3.6 Landscaping & Amenity – confirms 3 courtyards, incorporating 2 goods yards and upper podium private residential gardens. Majority of landscaping at street level

3.7 Drainage – indicated inclusion of green roofs, water gardens

6 Planning Policy Context – no mention of the Tree Strategy or BAP and the ref to the Sustainable Design & Construction SPD in 6.2.8 focuses on sustainable buildings, however the SDP includes more than just building guidance – it includes reference to tree planting.

12.7.9 Wind – along western façade of West Block 4 – require mitigation measures.
12.7.11 Podium – mitigation measures required. 12.7.12 Terraces and Roof levels – not currently intended for roof levels to accommodate amenity space – if used for residents, mitigation measures required.

Design Codes October 2025 ("DC")

I note this document is intended for approval, alongside the Parameter Plans.

As a general point, whilst the purpose of this document is to provide clarity by the use of the 'must' of 'should consider' language, I note that a lot of the 'principles' don't use either so how secure are they?

Also, phasing is only mentioned once (1.3.2) and very briefly. I assume this is dealt with elsewhere, albeit the DC doesn't say where.

I note that 2.2 states (in relation to residential accommodation): 'Please see the illustrative scheme within the Design and Access Statement for further details'. The DAS is, as stated, not requested for approval hence the DC should include all elements sought for agreement in principle.

4.1 Street hierarchy, junctions and crossings includes the statement that '*Streets, routes and crossings to maintain and enhance a continuous wildlife corridor to north boundary and create new links*'. I suspect this is challenging with the level difference across the site and I assume Ecology have provided comment on whether this is likely to be achieved with the indicative proposals. I note that Section 4 does not elaborate on this or show this wildlife link on any of the plans provided here, however I note clarity is given later.

5.1 Public Realm and Nature - Mandatory Fixes (p.34) – the mandatory elements in the first box do not go far enough in terms of clarity of expectation that links clearly to Policy and other adopted documents. The following amendments (underlined) would be appropriate:

- *SuDS features must be coordinated with future drainage and sustainability strategies and must be landscape-led at reserved matters stage and must be included across the site.*
- *Tree planting opportunities should be maximised in public realm across all areas, including the use of large canopy trees where space allows.*
- *Tree planting must align with aims of the Reading Borough Council adopted Tree Strategy (2021)*

I also think that there should be a better commitment to lighting design to ensure it does not conflict with wildlife or tree planting, along the lines of:

- Lighting must be coordinated with tree planting and designed to minimise detrimental impact on wildlife.

I note the inclusion of the following, which is positive:

- *Loading allowance for landscape over structure will be 20 kN/m² and allow for a 1000mm depth soil profile without the need for upstand planters*

I would suggest that an additional point is required to fix the principle of sufficient soil volumes, as is indicated in the DAS, along the lines of:

- Tree planting will be coordinated with service routes, hard surfacing and other structures to ensure sufficient soil volume for the species to achieve its maximum potential

5.1 Public Realm and Nature - Mandatory Fixes (p.35) – this plan refers only to ‘blue roofs’, not green roofs (as is suggested elsewhere) or blue-green roofs, as should be considered to provide biodiversity and link landscaping to the SuDs strategy.

5.2 Public Realm Hierarchy (p.37) – the drawing indicates a ‘minimum’ 10m width for the Plummery Gardens, which would mean that at REM stage 10m would have to be acceptable. Given the 2m pavement width (roadside) plus 4m cycle/pedestrian path (shared route) within the site, this leaves 4m to incorporate play, the rill, tree planting and other soft landscaping hence does not seem generous.



I note Heritage objections, which are not surprising given the massing and dominance of the scheme; the comments for the frontage being:

'I find the proposed tree-lined 'Plummary Gardens' to be generated with minimum space and additional natural elements. This is easily noticed when the proposed view (illustrative) and the existing street view are compared below. It is the existing tree line and soft landscaping that is used by the proposed scheme, without any notable addition to the appearance. It is the proposed blocks that would define the site and the Forbury Road more than 'Plummary Gardens' and 'Plummary Garden Threshold'. All defined secondary space and territorial space would contribute to the quality of design itself, benefiting the residents. As such, I cannot define any heritage benefits from the proposed scheme'

'Directly related to my comments about the setback positions of the blocks, heights and footprints, I would prefer a wider (not 10m to 20m including pavement) primary greenway for Plummary Gardens'

5.3 Links and Connections (p.38) states the shared route should be a minimum of 4.5m whereas the DAS, in front of East Block at least states a minimum of 4m.

5.3 Links and Connections (p.38) includes: *'The Greenways may include attenuation features as part of the side-wide drainage strategy where shown'*. I'm not clear what the definition of a 'greenway' is and clarity would be prudent here.

5.6 Tree Planting (p.46) – this includes:

- The development should retain the existing trees (London Planes) protected by a Tree Preservation Order on the southern boundary.*
- Highway design on site may require removal of existing trees*

These are somewhat surprising statements 1) because we know they are proposing to remove one of the TPO Plane trees and 2) give the second point doesn't refer specifically to TPO trees and we know that the majority of existing trees are to be removed to allow for development, not just highway design; if this point was supposed to refer only to TPO trees, it's concerning that it refers to 'trees', plural.

It goes on to state:

- *Protect all vegetation to be retained during construction and operational phases in accordance with BS5837:2012. Upon commencement of works on site, protective fencing should be erected around the canopy spread of trees, woodland areas and hedges to be retained. Fencing to be retained for the duration of the project. Protective fencing to be of a sturdy nature using scaffolding poles or similar equivalent using cleft fencing in accordance with BS1722:Part 4i, Type CW120 or Heras security fencing. Any excavations, cultivations and grading beneath the canopy of the protected trees and vegetation shall be carried out by hand using hand tools.*

There's multiple issues with the above statement which should just be replaced, along with the subsequent points relating to 'within the protected areas', with something along the lines of:

- All trees and vegetation to be retained must be protected in accordance with the approved Arboricultural Method Statement.

I would also suggest that an additional point would be reasonable, along the lines of:

- Final design must ensure no impact on the long term health of retained trees and ensure surrounding features and structures do not create conflict such that their sustainable retention is impacted.

5.6 Tree Planting (p.46) – aside from some of the species not being currently promoted due to their high numbers in the borough or suitable for other reasons, I'm not sure it's entirely helpful to have a palette specified, as what will be acceptable / available / suitable may change between now and whenever a reserved matters application is determined. However, it is useful in providing clarity on what the applicant considers to be a 'large', 'medium' and 'small' scale trees. I note that 'large', 'medium' and 'small' appear to be defined by both their ultimate height and stock size at time of planting – the two do not have to correlate.

5.6 Tree Planting (p.47) includes the following:

Minimum planting sizes for different tree characters must be as follows:

- *Large feature tree planting: min. 6-7m height, 35-40cm, min. 2.2m clear stem.*
- *Medium size semi-mature tree planting: min. 5-6m height, 25-30cm, 2.2m clear stem.*
- *Small trees / multistem trees: 2-3m within soft landscaped areas.*

Tree rooting volumes must be:

- *Minimum 14m³ or greater for Small sized trees.*
- *Minimum 20m³ or greater for Medium sized trees.*
- *Minimum 25m³ or greater for Large sized feature trees.*

I think this lacks clarity as it gives the impression that the large, medium and small trees in terms of stock size (first 3 points) will be provided with the soil volumes in the last 3 points. An ultimately medium sized tree might be planted at a large stock size, for example. In any case, in view of predicted hotter, drier summers and likely water restrictions, the

planting of large stock size trees is not promoted as they require more water to establish and generally take years to start growing, the smaller stock sizes catching up. Large stock sizes come with a greater carbon footprint too, e.g. for transport, as less can be accommodated on a lorry.

The second box on this page includes:

Tree planting to comply with:

BS 5837:2012: Trees in Relation to Design, Demolition and Construction – Recommendations.

I'm unclear why BS 8545:2014 'Trees: from nursery to independence in the landscape - Recommendations' (included in the third box) would not be stated here too? Incidentally, reference to this BS should be: BS 8545:2014+A1:2026 as it was amended this year.

Lastly, I think the following point should be expanded, as per the underlined part below:

- *Tree pit accessories such as aeration / irrigation pipes / watering bags and drainage inspection pipes must be provided for all street trees to support successful establishment and to facilitate monitoring.*

5.7 Planting (p.49) – this includes: '*Instant impact in key locations through the use of larger growing trees and larger stock size at time of planting*'. I do appreciate why they've suggested large stock size for instant impact and in the past, this is something we would have sought, however not any more for the reasons explained earlier.

5.7 Planting (p.50) includes:

- *Trees along primary roads to be planted to ensure positive visual impact from the outset. Large growing trees, to be selected. Trees not to be planted as single trees, but as a minimum of 2 together, allowing for visibility splays and cross routing of services*

I would suggest that the last part (underlined for ease of reference) is a separate point and expanded to something along the lines of:

- Tree planting will be coordinated with all potential conflicts, including lighting, services, bin & cycle stores and visibility splays.

The same page also includes:

- *Tree selection to accord with NHBC guidelines in respect of tree species selection, ground conditions, proximity to new buildings, visibility splays and driveways*

I'm not sure visibility splays and driveways is needed here but would be covered in the suggested point above, albeit I'm not sure what the 'driveway' context is here. In any case, the point puts trees last, i.e. design the building then choose trees accordingly. This is not an acceptable approach – the landscape design is integral to the development so should come first, with building foundations then designed appropriately. I would imagine, given the nature of the proposals, that foundations would be extensive anyway.

5.8 Materials (p.53) states the following to which I've added an expansion of the point (underlined):

- *The materials palette must also adapt to accommodate an evolving SuDS strategy, where permeable or pervious surface materials may be required to parking courts, or roadways, or surrounding tree pits, where the underlying geology allows.*

5.8 Materials (p.58) – in relation to the litter bins, EP may wish to also ensure they are rat proof.

5.9 Surface Water Drainage SUDS – this refers to 'blue roofs' which are not mentioned when discussing green roofs earlier in the document. Clarity is required with consistency through the document. I note that 5.10 Public Realm and Daylight to Ground Requirements (p.61) refers to green-blue roofs.

I'm unclear why the '*Planting areas: soil depth - 1m*' is so limited on this drawing – appearing to only relate to the immediate perimeter of the western and central blocks.

5.12 External Lighting – this should include an additional point along the lines of:

- Lighting will be coordinated with tree planting and biodiversity enhancements to avoid conflict and avoid negative impacts on wildlife.

5.13 Access for All – refer to my comments above on drawing 50582-STN-HGN-SW-DR-CH-0011 P02 within Appendix C of the Transport Assessment dated November 2025, relating to the ramp.

5.2.1 Public Realm Character Areas (p.65) – refers to biodiverse roofs. Comments as above on the need to clarify roof proposals.

5.2.5 Western Courtyard & 5.2.6 Residents Terrace (and anywhere else with an 'edge') – should these also refer to the boundary / fencing principles for the edges?

5.2.8 Woodland Garden – the extent of this differs between pages 76 & 77. I note, again the reference to blue-green roofs.

5.2.9 Boundary Infrastructure (p.79) – it's not clear from this how tree planting would be accommodated. The extent of the rear boundary planting is not consistent with that shown in the DAS, particular in the north-west rear corner.

6.2 General Built Form Principles – should the point relating to wind considerations, be expanded as following (addition underlined):

- *Design of all building must mitigate against wind tunnel effects and downdrafts and all terraces provided with sufficient boundary treatment (hard and/or soft) for mitigation.*

6.3 Separation Distances – I note the following point:

- *Separations distances between blocks range between 16m and 21m with a minimum of 16m separations distances between sheer faces of residential blocks must be observed.*

The following point allows 2m protrusion of balconies & bays into this zone. If this was allowed on both sides, that's 4m less for tree canopy space and without constraint on the number of such elements, it could have a significant impact, and also, of course, create greater conflict with trees. It can be seen from the Illustrative Masterplan (in DAS) and indicative drawings in the DC, that planting strips are incorporated alongside buildings, adding to the concern. I recommend setting a clear width, including protrusions.

The Built Form section and Parameter plans set the maximum footprint – I have concerns about the proximity of Eastern Block 3 to the retained TPO Plane trees, particularly if balconies would then be allowed, i.e. in relation to conflict if the trees are allowed to reach their optimum potential, which they should be. As we have no AIA further comment is not possible, so concern remains.

Parameter Plan 04 Proposed Sewer Location No Build Zone – this shows the sewer easement along the rear boundary (no build zone), 'indicative location of existing sewer' and proposed new foul water sewer / proposed Kevavon Drive diversion. I note the proposed sewer is in the road hence should not impact the TPO trees.

Parameter Plan 09 Proposed – Maximum Deviation Plan Ground Level – this shows the footprint of the blocks (each divided into 4); the west block shown as one footprint. It is assumed that this represents the maximum footprint that would be allowed if development was approved, incorporating this plan. This, and any other plan that fixes potential building footprints, if approved, would allow a REM application to come forward with East Block 3 in the location shown, hence I am concerned, as above.

Parameter Plan 13 Proposed Site Levels Maximum Building Heights 18111-SQP-ZZ-05-DR-A-PL00013 Rev P2 – I note heights range from 61.5m on frontage (but 70.5 at west end and 67.5-73.5 at east end) up to 73.5. I understand (from the DAS) that this ranges from 5-11 storeys.

AVR's Verified Views in Appendix 13.4 (existing and proposed views) demonstrate the significant extent of built form proposed and the dominance of this from various points, particularly looking north along Forbury Road towards the site, from Kings Meadow (a Major Landscape Feature), from Forbury Gardens (heritage view)



In conclusion, multiple amendments are required the DC as detailed above as it is not currently acceptable. An AIA is required, which has been requested directly by me and then you without a response, and in any case the need for this was made clear in 2023, without which the proposals cannot be properly assessed in relation to existing trees resulting in clear 'failure to demonstrate no harm to high amenity TPO trees' contrary to policy. Currently the application is not supported.