

Memo

To: Jonathan Markwell, Planning

From: Sarah Hanson, Natural Environment Officer, Planning

CC:

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.

Further to my memo of 23 April 2026:

My previous memo reiterated expectations in relation to trees & landscaping, commented on the DAS and Design Code (DC) and reiterated the need for an Arb Impact Assessment.

Existing trees

In relation to the tree documents now provided, I note that the agent's email of 17/6/26 states that: *'These are submitted principally in response to the requests made by the Natural Environment Officer'*; a point reiterated in the Arboricultural Statement. It should, of course, be noted that the requirement for a tree Survey and AIA is clear within our validation checklist and is an expectation from the Council (not just me) and was made clear in 2023.

With reference to the **Arboricultural Statement from Treework Environmental Practice** (no ref or date):

This includes the statement that:

'A separate Arboricultural Impact Assessment report and Tree Protection Plan have been provided to cover the element of the application that is not a reserved matter, for which final layout details have been submitted, where it is possible to assess the impact on trees with a degree of certainty, i.e. limited to the impact of the construction of the two access roads'.

However, given the parameter (maximum footprint) plans provided and given my concerns about works around the TPO Plane trees and proximity to the East Block, it would have been wholly appropriate to include this part of the site as well; being the only TPO trees and retained trees (accordingly to the tree & vegetation removal plan in 6.5.4 of the original DAS for this application).

The conclusion advises that an AIA/AMS will be devised covering the reserved matters at a later stage and that *'The potential conflict between trees to be retained on the site and the proposed development, as well as any detailed engineering requirements will be considered during the design phase leading to the final layout'* and indicates arboricultural consultant input in this.

Whilst it's positive that arb input will factor into the final design, we have to comment on the potential maximum footprint, as shown in the parameter plans which, if approved, could be built out. It is reasonable, therefore, to express concern if these maximums result in potential conflict with existing trees and therefore to expect an AIA to cover these.

With reference to the **Arboricultural Impact Assessment from Treework Environmental Practice ref 260610-1.1-KMVR-AIA-PM, dated 10th June 2026:**

The Executive Summary confirms that the report *'provides an assessment of the impact of the proposal to construct two access roads.... This report is a supporting document for the elements of the outline application that have been applied for in detail: the two access points from Kenavon Drive and Forbury Road'.*

And that:

'Elements of the outline application that are reserved matters, such as the landscape design and indicative site layout presented on the Illustrative Masterplan may have further implications for tree retention and removal and will be supported by additional Arboricultural Impact Assessment reports at the appropriate time in the planning process'

And that:

'Widening of the eastern access road may involve excavations extending into the Root Protection Area of T21, the eastern London plane in the group of trees protected by a Tree Preservation Order, depending on how far the surfacing in this area is intended to be replaced. If excavations are required to replace surfaces or kerb-lines then careful consideration will need to be given to how this is achieved. If not then existing surfacing will protect the roots of this tree'.

In relation to the above, whilst this outline application seeks to reserve all matters, except access, we are being asked, through the Design Code (DC) to approve parameter plans showing the maximum footprint hence it is appropriate to understand the potential impact of these and how harm to trees might be mitigated (through an AIA) in order to demonstrate whether the proposals as a whole are acceptable and policy compliant. In

any case, the 3rd extract above, which is specific to the access for which the AIA is supposed to be covering, leaves questions open.

1.1.4 states:

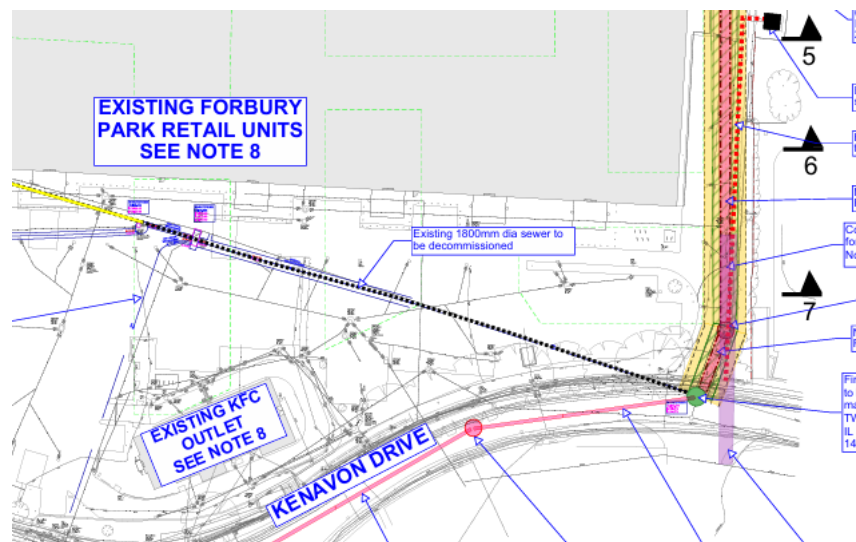
'This report is intended to consider the impact on those trees adjacent to the two proposed access roads only. The remainder of the trees across the site are discussed in a separate Arboricultural Statement, that considers the potential impacts of what are currently indicative layouts, presented on an Illustrative Masterplan. A further Arboricultural Impact Assessment will be submitted for future reserved matters applications, when the details become available for the remainder of the site'.

We do not appear to have this additional AIA?

The report confirms the removal of the eastern TPO Plane tree (T22 of the survey) to allow for site access widening – a point previously acknowledged as necessary. In terms of tree works, it is noted that crown lifting of adjacent T21 Plane to 4-5m is recommended for clearance purposes. Given the Tree Survey has the lowest branch of this tree at 4m (no direction stated) and crown clearance at 4.5m, the work is likely to be minimal, with removal of no main branches required.

3.3.4 states: *'As discussed in section 3.1.1 fencing will need to be erected to protect trees adjacent to the western entrance only if these are retained in the final landscape scheme which is currently a reserved matter'.* I would suggest that the final landscape scheme is only part of the picture. The question is whether these additional trees could be retained as part of the layout indicated on parameters plans.

3.5.1 states that *'There are no utilities or services associated with this element of the application...'*. However, as per the DAS, this confirms decommissioning of an existing sewer in this location:



Tree Constraints Plan/Illustrative Masterplan (Appendix C) & Tree Protection Plan (Appendix B) – both dated June 2026 - indicate the retention of multiple trees, over and above the TPO Plane trees, which is not consistent with any proposed plans. The TPP deals with protection (in basic detail) for the trees shown as retained adjacent to the two

access points only; limited (as indicated above) to the detailed matters included within this application.

My previous memo on this application, and in 2023, raised specific concerns relating to the development as indicated on parameter plans and in the DC. It is appropriate for these to be addressed, which the current AIA does not, limiting the content only to the two access points.

In conclusion on 'existing trees' matters, I don't consider the submissions give sufficient comfort that the proposals will not harm protected trees, both directly and indirectly.

Design & Access Statement dated June 2026

I understand that the changes to this are limited to page 30 (2.2.11 Listed Buildings & Conservation Areas) and page 43 2.3.2 (Existing Context - Consented and Emerging), as shown by blue text.

Neither of these changes impact comments made in my memo of 23 April 2026.

It would have been appropriate to update 6.5.3 'existing trees' in view of the additional arboricultural documents submitted.

The details of the trees to be retained and removed is provided in a table on P.165 and on the plan on P. 164 and remains as it was in the original version. This indicates the removal of all trees, except the TPO planes (except 1) – as per my comments above, this is confusing sitting alongside the AIA & TPP now provided.

I made numerous comments, however, these can/should be dealt with in the DC given the DAS is not sought for approval.

Design Code - June 2026

This document is sought for approval, alongside parameter plans, hence should include sufficient detail to demonstrate acceptability at the reserved matters stage. I made multiple comments and suggested amendments in my previous memo.

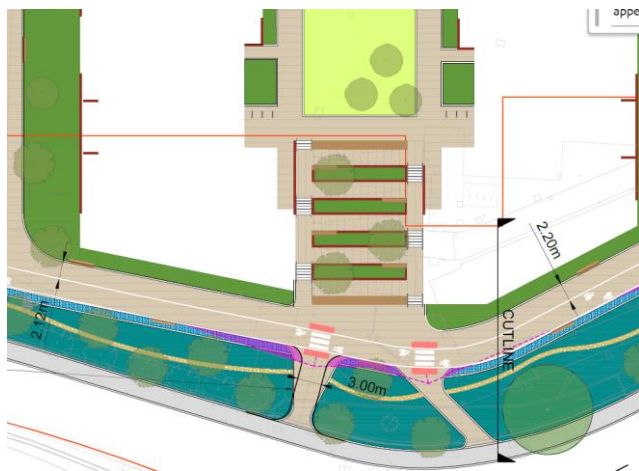
Changes (those that need a response in bold for ease):

- 3.1 (P.22) – no comment
- 4.1 (P.26) – no comment
- 5.1 Public Realm and Nature - Mandatory Fixes (P.34) – changes noted, incorporating my suggestions
- 5.1 Public Realm and Nature - Mandatory Fixes (P.34) – change to refer to blue & green roofs (as opposed to just blue) noted, as requested.
- 5.2 Public Realm Hierarchy (p.37) – in response to the concern about a minimum 10m for the Plummary Gardens having to accommodate the 2m pavement width (roadside) plus 4m cycle/pedestrian path (shared route) within the site, leaving only 4m to incorporate play, the rill, tree planting; this now states: '*10m minimum width up to 15m excluding the 2m wide pavement to the Forbury Road*'. I note this now excludes the roadside pavement hence that a min 10m (and up to 15m)

will provide for the 4.5m pedestrian / cycle way (width stated in 5.3), so actually leaving 5.5-10.5m to incorporate play, the rill, tree planting.

- 5.3 (P.38) – reference to ‘greenways’ (which was undefined) has been changed to ‘the links and connections’ (as described earlier on the same page)
- **5.6 Tree Planting (p.45) – I previously commented that the statements on the TPO Plane trees and retained trees were confusing, when considered against what other submissions showed. Reference to the retention of any of the TPO Plane tree is not omitted, which is not positive.**
- 5.6 Tree Planting (p.45) – suggested change to the tree protection statement has been done and additional point about final design and retained trees has been included
- *[A page (palette) has been removed as suggested hence page numbering for comments has changed slightly]*
- 5.6 Tree Planting, Proposed trees (p.46) – changes have been made to address my comments.
- 5.7 Planting (p.49) – new point added, as suggested, to deal with conflicts and the point relating to NHBC guidance (implying building design comes before trees) has been omitted.
- 5.8 Materials (p.52) – suggested change relating to permeable surfacing around tree pits has been made, as suggested.
- 5.8 Materials (p.54) – an addition to the bin specification to add ‘rat’ proof has been made, as suggested (I had only queried as to whether EP might want this).
- 5.9 Surface Water Drainage SUDS plan (P.57) only refers to blue roofs. P.56 (as elsewhere) refers to biodiverse / green / blue
- 5.12 External Lighting (P.61) – an additional point relating to trees & wildlife has been added, as suggested.
- **5.13 Access for All – I previously commented on the nature of the ramp and states: ‘refer to my comments on drawing 50582-STN-HGN-SW-DR-CH-0011 P02 within Appendix C of the Transport Assessment dated November 2025, relating to the ramp’. I can’t see any response to this. My comments were:**

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?

- 5.2.1 Public Realm Character Areas plan (P.64) amended to refer to biodiverse / green / blue roofs
- **5.2.5 Western Courtyard & 5.2.6 Residents Terrace (and anywhere else with an 'edge') – I previously queried whether these should also refer to the boundary / fencing principles for the edges? No amendment has been made.**
- 5.2.8 Woodland Garden and links (p.75 & 76) – 'and links' has been added
- 5.2.9 Boundary Infrastructure (p.77) – minor amendment done to refer to street trees to 'strengthen the boundary'
- 6.2 General Built Form Principles (P.84) – amended done to include boundary treatments for wind mitigation
- **6.3 Separation Distances (P.86) – an amendment has been made to satisfactorily address my concern about balcony and tree conflict as a general point. However no specific mention of the south elevation of the east Block is made where I raised concern about conflict between balconies and the existing Plane trees, including as they grow (they are not mature). I am concerned about the inclusion on balconies on this elevation so would not support plans / documents that would not allow us to require omission of these at a later stage.**
- 6.8.2 Active Frontage Residential (P.94) – additional point to incorporate defensive planting is welcome

- 6.9 Plot Design Codes (P.98 & P.99) – no comment

As per previous comments: **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.

In conclusion, positive amendments have been done to the Design Code in response to previous comments. However, there are a few points for which a response / clarity is still required, as detailed above.

As per my comments above, the limited nature of the AIA means there is a 'failure to demonstrate no harm to high amenity TPO trees' contrary to policy. Currently the application is not supported in relation to impact on existing trees.