

PLANNING REF : 251421
PROPERTY ADDRESS : 58
: Toutley Road, Wokingham, Berkshire
: RG41 1QL
SUBMITTED BY : Emmbrook Residents Association (Additional submissions)
DATE SUBMITTED : 21/11/2025

COMMENTS:

We refer to the additional documentation submitted by the application, updating the "TREE CONDITION SURVEY, ARBORICULTURAL IMPLICATIONS ASSESSMENT AND TREE PROTECTION RECOMMENDATIONS".

We note this was in part submitted to address the concern we previously raised about a mature tree, which is covered by a served Tree

Protection Order, that had not been identified by or included in the previous report. We also note the updated report has also sought to address one of our other original concerns that no on-site survey had been completed when categorising certain trees, including some of those which are proposed to be felled.

Whilst it is positive that the applicant has sought to address our original concern about lack of on-site assessment, we still have significant concerns, particularly in relation to T19 Oak Tree which has a tree preservation order (TPO) ref: 507/1989 in existence since 31 oct 1989. These concerns have been exacerbated by the updated AIA, and are summarised as follows:

1) Tree Preservation Order

Section 2.1 (page 4) incorrectly states that T19 is the subject of a provisional TPO. As noted above T19 is in fact the subject of a TPO Ref: 507/1989 in existence since 31 oct 1989. On that basis it is equivalent to T18, which has been assessed as a category A tree requiring protection.

The updated survey results (page 12) fail to record that T19 is protected by TPO 507/1989, in the same way as it does for T18.

2) Updated survey results (Assessment of T19)

In our initial submission, notwithstanding the lack of on-site assessment at the time, we highlighted a concern that T19 had been treated differently to T18. As a reminder our comments were: "there is a clear inconsistency in the categorisation of tree T19 with the criteria: T19 is identified with a life expectancy of 40+ years, whereas the criteria suggests category B assessment applies where trees are unlikely to be suitable for retention for beyond 40 years. We would also note from a visual inspection on site (albeit an untrained eye) that T19 is not noticeable different to T18, which has been identified as Category A ". In the revised assessment the life expectancy has been adjusted from 40+ years to 20-40 years without any clear basis for this adjustment.

The assessment for T19 now states "Almost 90% engulfed with dense Ivy growth, several dead branches. Unable to view main trunk due to Ivy foliage. Remove Ivy growth and crown thin 15%".

The assessment for T18 now states "Tall spreading crown engulfed with Ivy growth to 8 metres height with thick Ivy stems at base.

Several dead branches. Remove Ivy growth & crown thin 15% & crown lift lower third to 6 metres. Protected by confirmed Tree Preservation Order."

We have already clarified above that T18 should also state "Protected by confirmed Tree Preservation Order". Both trees are equally covered in Ivy and both trees are recorded as having several dead branches. The guidance for assessing trees as category B are noted in the AIA as "Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remediable defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation.". We do not consider the assessment for T19 identifies any impaired condition, or provides any relevant evidence which justifies the adjustment from 40+ years to 20-40 years, or indeed justifies any differing categorisation from T18. We consider both trees should reasonably have been categorised as A1.

We strongly consider that the assessment of T19 is materially flawed, when compared to the assessment of T18, and has likely been arrived at on the basis that the access road is not viable were both T18 and T19 to be retained. We therefore consider it is essential that officers seek an independent review of that assessment given the significance to this application and the proposed access road, and the risk that an incorrect assessment leading to the felling of T19 would likely constitute a breach of the confirmed TPO, which has been in place since 1989.

3) Plans of T19 in the AIA are confused
The AIA appears to be very confused over the intentions with T19. Whilst the narrative under section 2.1, and the map on page 14, state T19 is to be felled; the narrative under the updated survey results (page 12) state "Remove Ivy growth and crown thin 15%...", which infers that the tree is to remain and we would assert is the correct assessment, in line with that proposed for T18.

4) Tree root protection - updated diagram
The revised AIA includes an updated root protection proposal (Figure 1). We have already commented on how this diagram is not consistent with the levels on site. We would expect that any reasonable assessment under the AIA must consider the proximity of the root-structure in relation to the diagram presented. The diagram shows no detail of the tree root structure. As we have already noted, the root structure is 250mm above the entrance level to Oaklea Cottage. It therefore means that the root structure would be within the footway makeup and therefore not protected in any sense by the "no-dig permeable construction", or alternatively sections of the root structure would need to be removed to facilitate the "no-dig permeable construction". In either case we do not consider the approach is compliant with requirements to protect the tree, and we do not consider this has been afforded proper consideration under the AIA.

These ongoing issues only serve to reinforce that the proposed access road is not a viable means for accessing the site, and the

applicant should re-consider providing a fully compliant access via Toutley Road, as we have been asserting all along.

We trust officers will fully consider the matters raised above (including our suggestion that independent review of T19 be sought to avoid the risk of an inadvertent breach of a confirmed TPO) and revisit the position with the applicant.