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**LAND NORTH OF READING ROAD
ARBORFIELD**

PROOF OF EVIDENCE – LANDSCAPE AND TREES

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0.0 SUMMARY

- 0.1 This proof of evidence details the principal landscape and visual effects concerns arising from the proposed residential development on land North of Reading Road, Arborfield. I conclude that the proposals conflict with national policy, the Local Plan, and the Wokingham Landscape Character Assessment (LCA), and would result in significant and harmful landscape and visual change.
- 0.2 The site lies in open countryside, outside any settlement boundary, is unallocated in the Local Plan, and forms part of a rural landscape characterised by tranquillity, dark skies, historic settlement patterns, and mature vegetation including ancient and veteran trees.
- 0.3 The site comprises sloping agricultural land with a low-lying, waterlogged central area sitting on London Clay. Existing land uses are pony grazing and semi-natural regeneration. The site is enclosed by hedgerows and trees on three sides and contains a number of ancient or veteran trees. Access is proposed from Reading Road as is the emergency access, with several pedestrian entrances.
- 0.4 The indicative masterplan provides limited space for landscaping due to constraints posed by attenuation ponds, ancient/veteran tree Buffer Zones / RPAs and public open space requirements. These constraints force the built form closer to Reading Road, intensifying the urbanising effect.
- 0.5 There are national and local policy conflicts, including with NPPF paragraphs 135, 136, 187 and 193, and Core Strategy CP1, CP3, CP11, and MDD policies CC03 and TB21. The scheme is not visually attractive, does not add to the area's quality, fails to respect local character or settlement pattern,

threatens ancient/veteran trees, and does not protect the Green Route. The proposals fail to address landscape strategy, sensitivity and key issues; the proposals fail to retain or enhance the condition, character and features of the landscape.

- 0.6 Both LCAs emphasise conservation of rural character, tranquillity, dark skies, hedgerows, mature trees and open countryside views. The proposed housing, engineered drainage structures, lighting, signage and access arrangements introduce suburbanising elements that undermine the countryside gap between Arborfield Cross, the Green Route, and the future relationship of the Loddon Valley Garden Village with the countryside.
- 0.7 The LVIA omits assessment of key viewpoints including along Reading Road, from Church Lane, from public rights of way ARBO16 and ARBO19, and from the Leopard 3 bus route. Winter and night-time assessments are absent despite vegetation permeability and expected lighting impacts.
- 0.8 The site lies within a recognised dark skies hotspot. Proposed street lighting, vehicle glare, and domestic/security lighting would erode dark skies and visually link the site with Arborfield Cross. Observer Way, nearby, is deliberately unlit for landscape and ecological reasons. The LVIA does not assess these impacts.
- 0.9 The high water-table requires significant engineered attenuation basins with bunds of 330m length and up to approximately 1.5m above existing ground levels, at least 1m more if standing open water is required as mitigation for foraging bats. These bunds would be large, visually intrusive, and incompatible with the rural landscape. Earthworks could require between 522–835 lorry movements, generating disturbance in the countryside during construction.

- 0.10 The rural character and quality of the Green Route would be eroded by widened pavements, lighting, a bus stop kerb build-out, upgraded crossings, the engineered main and emergency accesses, and tree and shrub removal. Policy CC03 prohibits fragmentation of green infrastructure; the proposals cause fragmentation without meaningful mitigation.
- 0.11 Church Lane is a tranquil, rural lane lined by large properties with long gardens, mature trees and two listed buildings. The development introduces medium- to long-range views of engineered structures and housing, from the back gardens but crucially from Church Lane looking east. This harms the character and quality of the lane. Any illuminated pedestrian access would heighten urbanisation.
- 0.12 Reliance on screening contradicts GLVIA guidance and recent appeal decisions which establish that screening cannot make harmful development acceptable. The proposals seek to hide, rather than resolve, fundamental landscape objections to the development.
- 0.13 The proposals are for ordinary, standard and uninspired suburban development in the open countryside. The proposals would harm landscape character, compromise ancient or veteran trees, erode dark skies, create unmitigated visual impacts, urbanise the Green Route, and conflict with planning policy. Significant adverse effects cannot be mitigated and the scheme is therefore inappropriate for this location.
- 0.14 This Proof of Evidence also demonstrates that the appeal proposals would result in the deterioration of multiple ancient and veteran trees, all of which constitute irreplaceable habitat under national policy. The scheme does not avoid harm, does not provide the necessary space or conditions to protect these trees as suitable mitigation, and does not present any wholly

exceptional justification that could allow development to proceed where deterioration is expected. As such, the proposals fail the relevant NPPF paragraph 193(c) tests and cannot be supported.

- 0.15 Within the site and along Reading Road, there is a substantial assemblage of veteran and near-veteran oaks and a complex veteran lime, forming two ecologically functional groupings. These trees rely on intact buffer zones, undisturbed ground conditions, and continuous hedgerow, rough grassland and treeline connections. However, the submitted layout places gardens, drainage features, footpaths, recreation areas and built form within or immediately adjacent to buffer zones, and in some cases relies on buffers falling within private gardens, garden like public space or land outside the applicant's control. These approaches are incompatible with national guidance and make long-term protection of ancient or veteran trees impossible.
- 0.16 Specific trees—including the “walking” veteran lime, the veteran oak on the northern boundary, and most notably, T72, the large ancient/veteran oak on the eastern high ground—are each placed under unacceptable pressure from encroachment, compaction, light pollution, noise, and the almost certain need for repeated future tree surgery. In the case of the prominent eastern oak, the layout uses the tree as a focal amenity feature, surrounding it with housing and recreational uses, which directly contradicts the requirement to avoid harm.
- 0.17 The proposed highways works along Reading Road compound these problems. Veteran trees on the roadside will be affected by lighting columns, canopy conflict, and likely cable trenching, none of which have been designed around the larger compensatory off-set buffer zones required for

veteran trees along roadsides. The introduction of street lighting into this sensitive landscape also undermines both the tree habitats and the rural character of the Green Route, adding further cumulative harm.

- 0.18 Taken together, the main development, its engineered drainage requirements, and the associated highways works represent a pattern of deterioration, fragmentation, and urbanising influence that conflicts with national policy protections for irreplaceable habitat and with local policy protecting trees and landscape objectives.
- 0.19 Such changes echo closely the lists of direct and indirect impacts on ancient or veteran trees detailed in the Standing Advice *Ancient woodland, ancient trees and veteran trees: advice for making planning decisions*.
- 0.20 Furthermore, this proof of evidence demonstrates that the proposed mitigation strategy is weak for a number of the veteran trees and fundamentally flawed for at least ancient / veteran tree T72.
- 0.21 Mitigation is only the second step in the mitigation hierarchy that comes into plan when a loss or deterioration of ancient or veteran trees can be allowed because of exceptional reasons. The first step is 'avoidance' and it is my opinion that this scheme should not be allowed on this site. This would avoid the harm that the appellant is currently attempting to mitigate.
- 0.22 In the absence of any wholly exceptional reasons for allowing such harm, and a suitable mitigation strategy, these proposals should be refused.

1.0 AUTHOR

- 1.1 My name is Chris Hannington (CH). I have a BSc in Environmental Biology from Liverpool University and an MPhil in Landscape Architecture from the University of Newcastle-upon-Tyne.
- 1.2 I have worked as a landscape architect since 1988.
- 1.3 I have been a chartered member of the Landscape Institute in London since 1992 and of the Royal Town Planning Institute since 2016.
- 1.4 I am employed by Wokingham Borough Council as the team manager of the Planning Trees and Landscape (Environmental Services) Team. I have been with the Council in this capacity since September 2014.
- 1.5 From 2001 to 2010 I was the team manager in the Landscape and Arboriculture team at Wealden District Council. Part of my duties at Wealden included protecting and enhancing wildlife in the context of town and country planning.
- 1.6 For three and a half years during the late 1980s I worked as a landscape architect in the water and sewage industry, first for Thames Water and then for Severn-Trent region of the National Rivers Authority.
- 1.7 From 2001 to 2010 I was the team manager in the Landscape and Arboriculture team at Wealden District Council. Part of my duties at Wealden included protecting and enhancing wildlife in the context of town and country planning.
- 1.8 During my time at Wealden District Council (2000 to 2010), I conceived and ran, with the help of my team, the first survey of any Local Planning Authority in the Country, to record and publish to the Ancient Tree Inventory, a survey of ancient trees in Wealden District – the Wealden Ancient Tree Survey 2008

(supported by English Nature, Forestry Commission, Sussex Wildlife Trust, Woodland Trust, High Weald AONB Unit, etc). Throughout this we were generously advised and supported in this by experts including the late Dr David Lonsdale a national expert on ancient and veteran trees and Editor of the most comprehensive work on the care and management of ancient and veteran trees.

- 1.9 I also conceived and, with my team, ran the first survey to update the Ancient Woodland Inventory of any local authority in the country – the Wealden Ancient Woodland Survey 2006. I was similarly supported by national experts in this endeavour.
- 1.10 I have been specialising in the area of protected and valued landscapes since 2016 and ancient woodland, ancient and veteran trees and planning since 2001.

2.0 SCOPE OF PROOF AND POLICY

- 2.1 This proof should be read in conjunction with the statement of case and relevant appendices and core documents.
- 2.2 This proof addresses the impacts of the proposed development on landscape and trees.
- 2.3 The evidence in my proof of evidence is relevant to the effects on landscape and trees in relation to the following reasons for refusal:
- RfR 1: Principle of development: The location, on a greenfield site, is unacceptable in principle due to the countryside location outside of settlement boundaries and detachment from any settlement limits. The

resulting development would be substantially out of scale with the immediate locality and the development conflicts with the spatial objectives of the development plan and policies CP1, CP2, CP3, CP6, CP9 and CP11 of the Core Strategy, CC01, CC02 and TB21 of the MDD Local Plan, Policies IR1, IR2 and AD1 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF.

- RfR 2: Quantum and scale of development: The location and quantum of development would result in a development with a scale, character and density that is out of keeping with character and appearance of the area and countryside, resulting in a detrimental impact on the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy, CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD and sections 2, 4, 8, 9, 12 and 15 of the NPPF.
- RfR 3: Impact on the landscape and countryside: The development will have a detrimental impact on the landscape character & appearance of the area because of the loss of fields, paddocks and green infrastructure in the countryside and the erection of a large housing development that is out of keeping with the locality, contrary to policies CP1, CP3, CP9 and CP11 of the Core Strategy CC02, CC03 and TB21 of the MDD Local Plan, IR2, AD1 and AD3 of the Arborfield and Barkham Neighbourhood Plan, the Borough Design Guide SPD, the Wokingham District Landscape Character Assessment and sections 12 and 15 of the NPPF.

3.0 THE SITE

- 3.1 The site is located in the open countryside, outside any settlement boundary. The site is not allocated under the Local Plan.
- 3.2 The land slopes gently from 57m in the E to around 48m in the centre-west, the fall culminating in a depression currently colonised by Norfolk Reed (Phragmites australis). The triangular field to the West of this is roughly level.
- 3.3 The site fronts onto Reading Road to the South. The western 'roadside' part of this southern boundary fronts the Green Route and the eastern part running behind properties fronting Reading Road. To the East and North-East there are open fields, to the North are the long gardens of substantial countryside properties fronting Church Lane, and to the West is Church Lane itself.
- 3.4 The site is currently open fields with a small area of predominantly corrugated-iron agricultural buildings at centre-south.
- 3.5 Apart from the keeping of ponies the site does not appear to be in active agricultural management and there are wide swathes of forbs and some regenerating scrub and trees.
- 3.6 The central third of the site is generally low-lying and wet. The site sits on London Clay.
- 3.7 The road access is proposed to be from Reading Road just to the right and hard by the existing agricultural buildings. No access for emergency vehicles is currently shown in the proposals.
- 3.8 A total of four pedestrian access points are currently proposed. One at each end of the site frontage, (adjacent to two bus stops on Reading Road); one on the western side leading onto Church Lane; and one north of that,

through the North-West corner of the site (and apparently running through a neighbour's pond), also leading onto Church Lane.

- 3.9 The site is surrounded by trees on three sides: South, West and North. These offer the site some screening but there is still some visible permeability to these boundaries.
- 3.10 To the east the land rises to open farmland on that boundary. There are a few substantial hedgerow trees and a close clipped agricultural hedgerow along with areas of visibly permeable horse paddock fencing to the north-east.
- 3.11 A number of veteran trees have been identified including a large, veteran/ancient oak at the top (eastern) part of the site and a naturally layering and thicket forming veteran lime tree in the western triangular field that is currently shown as open space.
- 3.12 It is not clear whether streetlighting is proposed, and this will, of course, be an issue for reserved matters but, if the appeal is approved it is very likely that street lighting will be required. This would have further impacts on the landscape and will be discussed below.

4.0 SETTLEMENT PATTERN

- 4.1 The site has a rural, unsettled character.
- 4.2 The site sits between the medieval settlement of Arborfield and the post medieval settlement of Arborfield Cross. Arborfield Cross developed around an important Medieval or early modern trackway from Swallowfield to Wokingham, and then likely crossing the rest of the royal forest to the important royal site at Windsor, (MRM 18470). Four other routes meet the route of the Medieval trackway into and out of Arborfield Cross and are evidenced in the earliest maps. At this meeting of six ways, two inns developed one of which remains – the Bull Inn (listed as an early 17th century Grade II building).
- 4.3 Map evidence for the evolution of the two settlements is shown in CD07.04.
- 4.4 The two settlements can be seen in the 1607 Norden map which appears to show both settlements well established with a clear separation between the two.
- 4.5 In Rocque's map of 1761 shows two distinct settlements but with some houses and other buildings, seemingly associated with the estate of Arborfield Park to the west, around the location of Church Lane.
- 4.6 In Thomas Pride's map of 1790, the location of the medieval settlement is shown only as Arborfield House and what is now known as Arborfield Cross is shown simply as Arborfield. But the two settlements are distinct and separate.
- 4.7 The story is the same for subsequent maps, the distinction between the two settlements is clear over the centuries.

- 4.8 The 1823 map by Henry Walter shows the junction of Church Lane with Reading Road realigned to the east, its modern location. The land to the west appears to be the grounds of Arborfield Hall on the old site of Arborfield village to the north-west. In this map the land to the east and south of Church Lane is in the ownership of John Walter and the land to the west is in the ownership of Sir Edward Conroy a relative of Sir John Conroy comptroller of to the Duchess of Kent (and famously her young daughter, the future Queen Victoria). Sir John died at Arborfield Hall in 1854.
- 4.9 Even the addition of a new church and other changes to Church Lane in the 19th and 20th centuries do not significantly diminish the clear sense of separation between the two Arborfields. This is especially so as even the newest houses along Church Lane are substantial, set back from the lane behind their own leafy front gardens and have large rear gardens generally well-stocked with significant trees.
- 4.10 Modest additions to the built form along Reading Road in the 20th century are more obvious with a row of sizeable 1930s houses on the northern side (with later 20th century infill but retaining generous front gardens with trees and shrubs and substantial rear gardens backing onto the site). Walden Avenue on the southern side of the Reading Road is a small discrete development of a similar period.
- 4.11 Plans for the proposed Loddon Valley Garden Village (LVGV) and the adjacent Newlands Farm development demonstrate the importance of the appeal site in terms of the open countryside and separation they provide between these developments and the settlement of Arborfield Cross. Both these development sites are allocated under the emerging Local Plan Update and, as planned development, allow suitable buffers between

themselves and Church Lane. Church Lane is retained, standing slightly apart from the new development locations to the north buffered by public open space sports fields etc. The appeal site is visually and spatially separate partly because of the way it is accessed and partly because the scale of the properties in Church Lane and the extent of their gardens provides another buffer of countryside between the LVGV and Newlands Farm developments' buffers and the site.

- 4.12 As the medieval settlement declined it retained its manor house, church, mill and manor farm, but the centre of habitation and the commerce that went with it moved to the new settlement of Arborfield Cross on the higher ground to the east.
- 4.13 Later, Arborfield Hall, the grand house that replaced the medieval manor's Elizabethan replacement was itself demolished by then owners, the University of Reading, in 1955. Manor Farm, the old mill, the ruins of the old St Bartholomew's Church and, to the south of Reading Road, New Farm and Crosslands Farm remain from the original nucleus of the old (original) village of Arborfield and the estate that it served. The pattern is decline in the feudal estate focussed settlement with its grand house, farms and mill in the west and growth in the more democratic and independent settlement focussed around the new pubs in the east.
- 4.14 The mid-way point in the transition appears to be well illustrated in the Norden map of the Forest of Windsor (1607) one of the earliest modern maps showing a number of features of local interest.
- 4.15 Listed buildings in Arborfield Cross include: The Swan Inn, a Grade II listed former medieval hall house, now public house (late C15); Magnolia Cottage,

Eversley Road, a Grade II cottage (late C16;; the early 17th century Grade II listed Bull Inn; and Birch House, Eversley Road, a Grade II, 17th Century building.

- 4.16 BUT NB the old Grade II 13th century parish church of St Bartholomew, the old village church of Arborfield, now a ruin, sits close to the River Loddon and the old site of Arborfield Manor.
- 4.17 This transition appears to have happened gradually through the late medieval / early modern period as evidenced by the date of some key buildings in Arborfield Cross and the evidence from Thomas Pride's 1790 Map of the area around Reading (which shows the beginnings of the nucleated hill-top village of Arborfield Cross), Walter's map of Windsor Forest (1856), and the Ordnance Survey maps of 1873 and 1888.
- 4.18 Later development including bungalows and two-storey detached and semi-detached dwellings in Walden Avenue, larger properties fronting Reading Road to the S of the site and still larger houses on Church Lane developed through the 20th Century.
- 4.19 Today the nucleus of Arborfield Cross is around the meeting of the six ways near the Bull Inn, the site of the origins of that new settlement and a focus of the village still.
- 4.20 With the building of Observer Way to the SW of the village of Arborfield a strategic link between Reading, the proposed new Loddon Valley Garden Village and the Strategic Development at Arborfield Green will have been made.

4.21 The main throughfares are now focussed away from Arborfield Cross and its setting has once again become more tranquil.

5.0 THE LANDSCAPE

RELEVANT POLICY FOR LANDSCAPE

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 5.1 NPPF paragraph 135 requires that planning decisions 'should ensure that developments': a) 'function well and add to the overall quality of the area' ... b) 'are visually attractive as a result of good ... layout and appropriate and effective landscaping'; c) 'are sympathetic to local character and history, including the surrounding built environment and landscape setting', ...; d) 'establish or maintain a strong sense of place', ('using the arrangement of streets... to create attractive, welcoming and distinctive places to live, work and visit'); e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) ...; and f) create places that are safe, inclusive and accessible ...
- 5.2 Paragraph 136 of the NPPF requires that planning decisions 'should ensure that new streets are tree-lined', 'that opportunities are taken to incorporate trees elsewhere in developments' (eg parks and community orchards), that provision is made for long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Importantly solutions should be found that 'are compatible with highways standards and the needs of different users'.
- 5.3 Outside Valued Landscapes NPPF 187 requires that planning decisions 'contribute to an enhance the natural and local environment by' (b) 'recognising the intrinsic character and beauty of the countryside, ... and of trees and woodland.

- 5.4 Paragraph 193 of the NPPF deals with biodiversity including ancient or veteran trees. Whilst it is relevant to landscape this is discussed elsewhere in this report.

CORE STRATEGY POLICIES (CP)

- 5.5 Policy CP1 states that planning permission 'will be granted' for proposals that: 1) maintain or enhance the high quality of the environment.
- 5.6 Policy CP3 states that planning permission 'will be granted' for proposals that: (a) are of appropriate scale of activity, mass, layout, built form, height, materials and character; (c) have no detrimental impact on important heritage or landscape features; (f) contribute to a sense of place in the buildings and spaces in the way they integrate with their surroundings ...including the use of appropriate landscaping.
- 5.7 Further, development proposals are required to demonstrate how they have responded to the above criteria through documentation.
- 5.8 Policy CP11 seeks to 'protect the separate identity of settlements and maintain the quality of the environment'. It sets out strict criteria where development outside settlement limits is allowable, the default being that it is not.

LOCAL PLAN POLICIES

- 5.9 Policy CC03 addresses Green Infrastructure, Trees and Landscaping. It defines Green Routes by reference to a Local Plan map. It requires that development proposals 'demonstrate how they have (2) considered and achieved the following criteria within scheme proposals': (a) 'provide new or protect and enhance green infrastructure'.

- 5.10 Including mitigation for new development, (b) promote accessibility (around rights of way, cycling and bridleways); (c) promote the integration of the scheme with adjoining public space or countryside; (d) protect and retain trees, hedges and other landscape features; (e) incorporate high quality native planting and landscaping. Further, proposals resulting in the loss or fragmentation of green infrastructure ‘will not be acceptable’.
- 5.11 Most importantly policy TB21 addresses Landscape Character and requires that ‘proposals must demonstrate’ how they address the requirements of the Wokingham Borough Landscape Character Assessment (2019) including: ‘landscape quality, landscape strategy, landscape sensitivity and key issues’.
- 5.12 Further, ‘proposals shall retain or enhance the condition, character and features that contribute to the landscape’.

THE LANDSCAPE

- 5.13 According to the Wokingham Borough Landscape Character Assessment (2019) (CD01.16), the site sits on the boundary between two Landscape Character Areas: J2 - Arborfield Cross Barkham Settled and Farmed Clay to the east and C1 - Arborfield River Terrace

LANDSCAPE SUMMARIES

- 5.14 The C1 LCA is summarised in the WBC LCA as: ‘A large scale, open agricultural landscape slightly elevated above the Loddon floodplain. The area is crossed by a network of small lanes and tracks while larger roads run east-west providing access across the river. Areas of historic parkland at

Swallowfield and Arborfield contrast with the intensively farmed character of the landscape'.

- 5.15 The J2: Arborfield Cross and Barkham Settled and Farmed Clay is summarised in the WBC LCA as: A gently undulating landscape, principally in agricultural use. Large arable fields bound by hedgerows dominate, with smaller fields of sheep pasture and horse paddocks close to settlements.

RELEVANT KEY CHARACTERISTICS

C1 LCA RELEVANT KEY CHARACTERISTICS

- 5.16 Gently undulating river terrace landform between 45-50m AOD to the east of the River Loddon floodplain. The area is underlain by London Clay and river terrace gravels which give rise to loamy soils which are better drained than the floodplain, and therefore intensively farmed.
- 5.17 Small water features including tributary stream running through the Holt and drainage channels and ponds.
- 5.18 (And immediately to the E of the site) Intensive arable farmland with medium to large fields bound by indistinct boundaries, mainly post and wire fencing, with occasional gappy remnant hedgerows. Some horse paddocks present, and cattle grazing at the University of Reading farm and Centre for Dairy Research.
- 5.19 Small woodland and copses break up the agricultural plain. BAP priority habitat mixed lowland deciduous woodland dominates, with some wet woodland designated as LWS (Cuckoo Pen, Gravel Pit Wood/The Holt, Loaders Copse, Winnersh Woodland). Pound Copse and Great Wood LWS also contain small areas of ancient and semi-natural woodland.

- 5.20 (and to the NW of the site) Remnant historic parkland associated with the former Arborfield Hall. The presence of mature oaks provides a strong silhouette against the open sky.
- 5.21 Low-density settlement of farmsteads (typically red brick with weather boarded barns), manor houses and hamlets, except for the area north of the M4 where development has extended onto the river terrace on the edge of Winnersh.
- 5.22 Tree-lined narrow lanes, tracks, byways and footpaths allow recreational access to the river terrace, and access to the Loddon floodplain, as well as the Blackwater Valley Path.
- 5.23 Rural character and sense of remoteness, due to the predominance of narrow lanes and tracks and very low-density settlement. This is interrupted by the transport corridors in the north of the area, the M4, and new Winnersh Relief Road, as well as the proposed [now built] Arborfield Cross Relief Road in the centre of the area.

J2 LCA RELEVANT 'KEY CHARACTERISTICS

- 5.24 A gently undulating landscape between 50m and 65m AOD, underlain by London Clay with localised areas of River Terrace Gravels.
- 5.25 Consistent pattern of water bodies including streams, drainage channels, ditches and open water bodies of various sizes resulting from the clayey and loamy soils which impede drainage.
- 5.26 Wooded context provided by characteristic mature hedgerow and in-field trees, combined with woodland belts, This creates a loose sense of enclosure.

- 5.27 Arable farming dominates, with pasture on higher ground and horse paddocks near settlement. Fields used for paddocks are often subdivided with horse tape. •
- 5.28 Small-scale ... wetland habitats scattered on the edge of the area,
- 5.29 A dense settled character influenced by modern development including the new garden village on the site of Arborfield Garrison and the southern edge of Wokingham which incorporates an industrial estate. There is little consistent style or form.
- 5.30 Older scattered settlement of farms, hamlets and small nucleated villages at ... Arborfield Cross. The buildings have traditional vernacular of timber framing and clay tiles, exemplified by the Conservation Area at Arborfield Cross.
- 5.31 A network of busy local roads crosses the area. They tend to be rural in character, with ditches, hedges and hedgerow trees,
- 5.32 Public rights of way run between the settlements, and provide access for recreational use.
- 5.33 A rural character away from development and roads, with views across to adjacent character areas including across the Loddon Valley.
- 5.34 Under the heading 'Natural Landscapes', and at paragraph J2.2, the supporting text states 'Predominately underlain by London Clay' and at paragraph J2.3 'The soils tend to have impeded drainage or high groundwater and there is a consistent pattern through the area of drainage channels, streams, ditches and open water bodies of varying sizes...'.

RELEVANT VALUABLE LANDSCAPE ATTRIBUTES

C1 LCA RELEVANT VALUABLE LANDSCAPE ATTRIBUTES

- 5.35 Surface water, including ponds, ... and drainage ditches, adds visual interest and provides potential for small-scale wetland habitats.
- 5.36 Dispersed settlement pattern linked by tree-lined rural lanes emphasises the open and rural character of the landscape.
- 5.37 Valued area for recreation with a network of bridleways and public footpaths which allow enjoyment of the landscape.
- 5.38 (and NW of the site) Historic parkland landscapes at Swallowfield and Arborfield provide time-depth. Mature oaks create visual interest and strong silhouettes against the open sky.
- 5.39 Clear views to adjacent character areas due to the gently undulating, open landscape.
- 5.40 A tranquil area with a sense of remoteness, removed from roads and visual intrusion of settlement.

J2 LCA RELEVANT VALUABLE LANDSCAPE ATTRIBUTES

- 5.41 Pattern of arable and pastoral fields, which provides a rural character away from settlement, and creates an important separation between settlements.
- 5.42 Mature hedgerow trees and in-field trees which provide a wooded character and visual interest within the landscape.
- 5.43 Rural settlement pattern of farms, hamlets and small nucleated villages outside the urban area which provides a rural character and a link to the past.
- 5.44 Recreational value of the network of rights of way between settlements.
- 5.45 Views across the landscape to surrounding character areas,

LANDSCAPE CONDITION

C1 LCA LANDSCAPE CONDITION

5.46 The landscape condition of the C1 LCA is described as:

*Individual landscape components of the Arborfield River Terrace are generally in **moderate-poor condition**. The most intact components are the physical landscape, particularly the terrace landform, and the tranquil rural environment, although the area generally lacks a strong sense of place. The hedgerow network and historic field system have declined, many of the coppices are unmanaged and the vernacular architecture is being eroded by the introduction of unsympathetic components. The M4, Winnersh Relief Road and on-going construction of the Arborfield Cross Relief Road [now built] and expanding development north of the M4 will further fragment the agricultural landscape.*

J2 LCA LANDSCAPE CONDITION

5.47 The landscape condition of the J2 LCA is described as:

*The landscape is in overall **moderate condition**, due to the pattern of arable and pastoral fields, and remnant wetland influences associated with Barkham Brook. However, the hedgerow network is fragmented and the introduction of further development through the Arborfield Garrison SDL and associated infrastructure will further fragment the rural settlement pattern altering the character of the area.*

LANDSCAPE STRATEGY

C1 LANDSCAPE STRATEGY

5.48 The landscape strategy of the C1 LCA is:

to conserve and enhance the quiet, rural and agricultural landscape with its scattered rural settlement and rural lanes. The key aspects to be enhanced and actively managed are the areas of historic parkland (registered and not currently registered), the former hedgerow boundaries and trees, and the coppiced woodlands. Open views should be maintained, including to Arborfield Church and across the Loddon river valley.

In terms of development, the aim is to conserve the sparse settlement pattern, minimising primary and secondary influences from adjacent landscape areas.

J2 LANDSCAPE STRATEGY

5.49 The landscape strategy of the J2 LCA is:

to conserve and enhance the remaining rural character of the landscape. The key aspects to be conserved and enhanced are the field pattern with mature hedgerow trees, wetland and woodland habitats, rural lanes and historic features.

In terms of development, the aim is to integrate new development into its landscape setting, and retain the open and rural character of the landscape between settlements.

LANDSCAPE GUIDELINES

C1 LCA RELEVANT 'LANDSCAPE GUIDELINES

5.50 Increase the extent of native deciduous woodland and hedgerow planting (with hedgerow trees), using locally occurring native species in order to

create green links to other woodland habitats and to dampen extreme river flows within river catchments.

- 5.51 Conserve the open and rural qualities of the landscape. Manage and enhance the wildlife interest of agricultural fields by encouraging the creation of uncultivated field margins and other wildlife-friendly farming methods around intensively farmed fields.
- 5.52 Reinststate or repair hedgerows with native species where there are opportunities to do so. There has been recent planting of new hawthorn hedgerows, and this should be encouraged and continued.
- 5.53 Conserve, enhance and manage ... parkland habitats, ... This network of natural habitats has been identified as a target for habitat creation and restoration and positive management of parkland and farmland for farmland birds. Mineral extraction is proposed in parts of the valley which should provide opportunities for habitat creation including reedbed creation. The 2003 Environment Agency biodiversity strategy for the Loddon catchment should be used.
- 5.54 Maintain the rural character and sparse settlement pattern of Arborfield and dispersed farms through control of new development and avoiding spread of development into the area. Resist the development of large or tall structures which could obscure the open views across the open landscape.
- 5.55 Enhance sense of place through careful design (including siting, massing, scale materials and landscape– as well as sensitive lighting to retain dark skies at night) to minimise the impacts of any potential new development on valuable landscape attributes.
- 5.56 Resist proposals that introduce extensive or obtrusive elements e.g. pylons on the visually sensitive landscape.

- 5.57 Maintain and enhance the character of rural leafy lanes resisting unsympathetic highways improvements, infrastructure and signage.
- 5.58 Use appropriate tree and hedgerow planting to help integrate roads in relation to Winnersh Relief Road and proposed Arborfield Cross Relief Road and new junction at A327. Encourage retention of wooded edges and boundaries along roads and minimising fencing and other boundary structures.
- 5.59 Protect the perceptions of tranquillity/remoteness dark skies in the landscape, through the management of development, ensuring development, including infrastructure, does not spread into the river terrace.

J2 LCA RELEVANT 'LANDSCAPE GUIDELINES

- 5.60 Conserve woodlands, including ... remnant standard trees. ...
- 5.61 Conserve the open and rural qualities of the farmed landscape which provides a physical and visual separation or gap between settlements. Protect the individual identity of towns and villages, and retain their sense of physical and visual separation.
- 5.62 Conserve and manage hedgerows with standard trees as important wildlife habitats and landscape features, as well as the links they provide across the landscape and between areas of woodland. Plan for the next generation of hedgerow trees with a programme of tree planting.
- 5.63 Conserve and protect the landscape pattern of mixed pasture and arable fields and encourage appropriate management of grassland by grazing.
- 5.64 Conserve, enhance and manage wetland and woodland habitats including within LWS. Protect the habitats from development,

- 5.65 Enhance sense of place through careful design (including siting, massing, scale, materials and landscape – and sensitive lighting to retain dark skies at night) to minimise the potential impacts of any new development on valuable attributes.
- 5.66 Maintain and enhance the character of rural lanes resisting unsympathetic highways improvements, infrastructure and signage particularly in the most rural areas.
- 5.67 Use appropriate tree planting to help integrate new roads in relation to proposed Arborfield Cross Relief Road and the extension of Nine Mile Ride. Encourage retention of wooded edges and boundaries along roads and minimising fencing and other boundary structures.
- 5.68 Conserve views to distinctive wooded horizons. Particular care should be taken in the siting of communication masts or other vertical elements, which have the potential to be highly visible in this elevated landscape.
- 5.69 Reduce and prevent further noise and light pollution through the sensitive siting of any new development, including infrastructure, and especially any proposed night-time lighting.

RELEVANT KEY ISSUES

C1 LCA RELEVANT 'KEY ISSUES'

- 5.70 Demand for residential and commercial development and supporting infrastructure both inside and outside the areas is continuing to push development onto the river terrace impacting the rural and tranquil character of the area.
- 5.71 Demands for upgrading the winding network of rural lanes with new signage, line painting and widening changes the intimate rural character of the lanes.

- 5.72 Increased use of the existing road network leading to the continuous presence of background traffic noise from the M4 and other major roads across the river terrace including the proposed [now built] Arborfield Cross Relief Road linking major residential developments outside the area.
- 5.73 Increasing demand for communication masts, pylons and poles leading to visual intrusion of these elements in the open landscape

J2 LCA RELEVANT 'KEY ISSUES'

- 5.74 Drainage operations have resulted in loss of wetland habitats. This threat continues as a result of drainage schemes associated with new building works and agriculture.
- 5.75 Pressure for large scale residential development and supporting infrastructure impacting landscape character.
- 5.76 Increased traffic on rural roads due to expanding residential development in the area leading to loss of tranquillity, erosion of road verges and increased levels of air pollution in rural areas.
- 5.77 Light pollution at night causing 'sky glow'.
- 5.78 High demands for recreation continue to threaten the tranquillity of the landscape. Recreational pressure can lead to erosion of special archaeological features, ecological features and other landscape features and is a continuing problem in this well-populated borough.
- 5.79 Increasing demand for communication masts, pylons and poles leading to visual intrusion of these elements in the open landscape.

THE GREEN ROUTE

POLICY PROTECTING GREEN ROUTES

- 5.80 Green Routes are identified in MDD Local Plan policy CC03(1) (see Local Plan map 341 headed 'Green Infrastructure' - CD18.12).
- 5.81 Reading Road is identified as a 'Green Route' on that map. As well as this very obvious link between policy and Green Routes there are other policies which should be applied to them.
- 5.82 Paragraphs relating to Green Routes includes those relating to landscape, environment and Green Infrastructure in the NPPF (2024) including paragraphs 135 (proposals should 'add to the overall quality of the area'... c) be 'sympathetic to local character' and 'landscape setting').
- 5.83 Paragraph 136 is also relevant (planning decisions 'should ensure that new streets are tree-lined', 'that existing trees are retained wherever possible' and that solutions should be found that 'are compatible with highways standards and the needs of different users').
- 5.84 Paragraph 187 (planning decisions 'contribute to an enhance the natural and local environment by' (b) 'recognising the intrinsic character and beauty of the countryside,... and of trees and woodland)
- 5.85 Because of the veteran trees flanking the Green Route in this location NPPF policy 193 also applies.

READING ROAD GREEN ROUTE

- 5.86 Reading Road is a Green Route. It is a two-lane road, well tree'd with some veteran trees amongst them. Along some lengths of the Green Route there are framed views along the Reading Road (including along the length of the

development frontage). Along other lengths of the Green Route there are views out into the countryside.

- 5.87 There is a traffic calming scheme which visually detracts from the Green Route but, because it calms traffic, enhances the rural feel of the route.
- 5.88 Recent improvements include the closing of Pudding Lane plant nursery and the removal of various signs and the building of Observer Way, the Arborfield Relief Road to the SW which has reduced the busyness of the road.
- 5.89 Whilst there are considerable lengths of strong and vibrant hedgerows here are hedgerows that are thin and gappy in places. However, these just have the effect of opening up views across agricultural landscapes and adding to diversity.
- 5.90 The site's naturally 'rewilded land' can be glimpsed through the thin hedge fronting the appeal site. A view that has local appeal notwithstanding the group of small corrugate iron buildings at the centre of the site.
- 5.91 There are opportunities to enhance tree and hedgerow planting along the Green Route although this should not so excessive as to truncate views out across open countryside.
- 5.92 The Green Route can be enjoyed by bus (the Leopard 3 from Reading to Wokingham and back), by car (there is a 30mph limit from Arborfield Cross) and along the pedestrian footway on the southern side of the Green Route.

6.0 ANCIENT OR VETERAN TREES

POLICY, GUIDANCE AND VETERAN TREES.

ANCIENT AND VETERAN TREES IN PLANNING

- 6.1 Addressing the issue of Ancient or Veteran trees in planning and the provision of irreplaceable habitat, the NPPF (Dec 2024) states that:

193. When determining planning applications, local planning authorities should apply the following principles:

(c) developments resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶⁷ and a suitable compensation strategy exists, and...

- 6.2 So then, if development results in loss OR deterioration of the irreplaceable habitat that is an Ancient and/or Veteran tree, there must be:

- Wholly exceptional reasons AND
- A suitable compensation strategy

- 6.3 It is beyond the scope of my evidence to deal with whether there are any exceptional reasons that would justify loss/deterioration in the circumstances of this appeal.

- 6.4 In the proposed scheme no suitable compensation strategy has been proposed.

- 6.5 Footnote 70 to paragraph 193(c) gives examples of ‘wholly exceptional reasons’. It states:

(67) For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid

bills), where the public benefit would clearly outweigh the loss or deterioration of habitat. ↩

- 6.6 In this appeal it is agreed that the veteran trees on this site are, by definition, 'irreplaceable habitat'.

THE GOVERNMENT'S STANDING ADVICE

- 6.7 The Governments Standing Advice - *Ancient woodland, ancient trees and veteran trees: advice for making planning decisions* (Appendix CD04.03.32) gives guidance on avoiding impacts to ancient or veteran trees. It states:
- You and the developer should identify ways to avoid negative effects on ancient woodland or ancient and veteran trees. For example, selecting an alternative site for development or redesigning the scheme.*
- You should decide on the weight given to ancient woodland and ancient and veteran trees in planning decisions on a case-by-case basis. You should do this by taking account of the NPPF and relevant development plan policies.*
- If you decide to grant planning permission that results in unavoidable loss or deterioration where wholly exceptional reasons are demonstrated, you should use planning conditions or obligations to make sure the developer:*

- *avoids damage*
- *mitigates against damage*
- *compensates for loss or damage (use as a last resort)*

This is known as the mitigation hierarchy. You should apply the mitigation hierarchy in line with NPPF paragraph 180a to avoid significant harm to biodiversity.

6.8 It is interesting to note that the first advice is that the developer and the LPA should seek to 'select an alternative site' or 'redesign the scheme'.

6.9 But if 'wholly exceptional reasons' could be demonstrated, any approval must ensure, through the use of planning conditions or obligations, that the proposals: avoid damage, mitigate, and compensate for loss or damage.

6.10 The Standing Advice gives further guidance, this time on mitigation. It states: *Mitigation measures will depend on the type of development. They could include:*

- *putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution*
- *measures to reduce noise or light*
- *designing open space to protect ancient or veteran trees*
- *rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations*
- *creating buffer zones*

6.11 Buffer Zones are clearly shown in the Standing Advice to be measures not for avoiding damage but instead, on the second tier down the mitigation hierarchy, for mitigating damage where 'If you decide to grant planning permission that results in unavoidable loss or deterioration where wholly exceptional reasons are demonstrated, you should use planning conditions or obligations to make sure the developer' implements the mitigation hierarchy.

6.12 The Standing Advice continues with a note on the 'Use of buffer zones', it states:

Buffer zones can protect ancient woodland and individual ancient and veteran trees and provide valuable habitat for woodland wildlife, such as feeding bats and birds. The size and type of buffer zone should vary depending on the:

- *scale and type of development and its effect on ancient woodland, ancient and veteran trees*
- *character of the surrounding area*

6.13 The Standing Advice then gives examples of situations where ‘larger buffer zones are more likely to be needed’, for example where the surrounding area is:

- *less densely wooded*
- *close to residential areas*
- *steeply sloped*

6.14 The site of the current application is in open countryside but the fact that ancient and veteran trees sit adjacent to a road, and on the boundary with adjacent land owned by others, does mean that there may be a need for a larger buffer zone extending into the site. This is explored below.

6.15 The Standing Advice details the minimum size of buffer required. It states:
For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area.

Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.

Where possible, a buffer zone should:

- *contribute to wider ecological networks*
- *be part of the green infrastructure of the area*

A buffer zone should consist of semi-natural habitats such as:

- *woodland*
- *a mix of scrub, grassland, heathland and wetland*

The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.

You should consider if access is appropriate. You can allow access to buffer zones if the habitat is not harmed by trampling.

You should not approve development proposals, including gardens, within a buffer zone.

You should only approve sustainable drainage schemes if:

- *they do not affect root protection areas*
- *any change to the water table does not negatively affect ancient woodland or ancient and veteran trees*

- 6.16 Whilst the Standing Advice does not specify off-setting of buffer zones. It would seem reasonable that some off-setting might be appropriate where required by best practice (for example in LONSDALE CD04.03.33) and where ancient and veteran trees lie close to infrastructure, built form or other landholdings where RPAs and Buffer Zones cannot be secured either

because of the hostile nature of the soil environment in the case of the first two or by reason of unacceptable impacts on the rights to the enjoyment of their property (including permitted development rights) by adjacent owners.

6.17 lie adjacent to an ancient woodland, ancient or veteran tree/s. However, the Standing Advice does require a larger buffer where the area is:

- *less densely wooded.*
- *close to residential areas*
- *steeply sloped*

ANCIENT OR VETERAN TREES IN FURTHER GUIDANCE

6.18 Ancient and veteran trees are also addressed in further guidance. Principally in British Standard 5837 (2012): Trees in relation to design, demolition and construction (CD18.04), and Ancient and other Veteran Trees; Further Guidance on Management, Lonsdale D (Ed)¹ (referred to here as LONSDALE – CD04.03.33).

CARE AND PROTECTION OF VETERAN TREES

6.19 The best available guidance on the care and management of ancient and/or veteran trees is: LONSDALE (Ed.), Ancient and other veteran trees: further guidance on management, Ancient Tree Forum 2013 (referred to here as 'Lonsdale'). This is referenced throughout the ancient or veteran trees section of this proof of evidence.

¹ Lonsdale, D. (ed.) (2013). Ancient and other veteran trees: further guidance on management. The Tree Council, London 212pp.

ROOT PROTECTION AREAS

6.20 Root Protection Area (RPA) is a concept defined in British Standard 5837 (2012):

3.7 root protection area (RPA)

layout design tool indicating the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree's viability, and where the protection of the roots and soil structure is treated as a priority

6.21 It is important to note that the RPA is defined as the minimum area around a tree required to contain sufficient roots and rooting volume to maintain the tree's viability.

6.22 It is key that protection of roots and soil structure is treated as a priority in this RPA and the rooting volume it is designed to protect.

6.23 Seeking to quantify the RPA the British Standard states:

4.6 Root protection area (RPA)

4.6.1 For single stem trees, the RPA (see 3.7) should be calculated as an area equivalent to a circle with a radius 12 times the stem diameter. For trees with more than one stem, one of the two calculation methods below should be used. In all cases, the stem diameter(s) should be measured in accordance with Annex C, and the RPA should be determined from Annex D. The calculated RPA for each tree should be capped to 707 m².

- a) For trees with two to five stems, the combined stem diameter should be calculated as follows:

$$\sqrt{(\text{stem diameter } 1)^2 + (\text{stem diameter } 2)^2 \dots + (\text{stem diameter } 5)^2}$$

- b) For trees with more than five stems (not illustrated in Annex C), the combined stem diameter should be calculated as follows:

$$\sqrt{(\text{mean stem diameter})^2 \times \text{number of stems}}$$

4.6.2 The RPA for each tree should initially be plotted as a circle centred on the base of the stem. Where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced. Modifications to the shape of the RPA should reflect a soundly based arboricultural assessment of likely root distribution.

4.6.3 Any deviation in the RPA from the original circular plot should take account of the following factors whilst still providing adequate protection for the root system:

- a) the morphology and disposition of the roots, when influenced by past or existing site conditions (e.g. the presence of roads, structures and underground apparatus);
- b) topography and drainage;
- c) the soil type and structure;
- d) the likely tolerance of the tree to root disturbance or damage, based on factors such as species, age, condition and past management.

- 6.24 In the case of a number of veteran trees on the site and adjacent to the proposed highways works between the site entrance and Arborfield Cross, they will require compensatory off-setting of their Buffer Zones / RPAs to allow for pre-existing site conditions (in this case roads).
- 6.25 There is no evidence of roots penetrating under the Reading Road. There is evidence of relatively recent drainage works (including a line of manhole covers) immediately to the north of, and parallel to, Reading Road.
- 6.26 It is more likely that there are not significant volumes of roots under the Reading Road than that there are. This is why the BS 5837 (2012), discussing the plotting of Root Protection Areas (RPAs), originally as circular plots and then as irregular shapes to take account of local circumstances states:

4.6.3 Any deviation in the RPA from the original circular plot should take account of the following factors whilst still providing adequate protection for the root system:

a) the morphology and disposition of the roots, when influenced by past or existing site conditions (eg the presence of roads, structures and underground apparatus);...

- 6.27 The metalled road surface, along with its sub-base and the excavations required for the drain immediately to the north of Reading Road make it more important that a compensatory off-set is calculated for all trees along roads.
- 6.28 In addition, there should also be an element of compensatory off-setting to address root competition where groups of trees to be retained grow in close proximity. The root systems of individual trees will grow more on the sides away from competing trees and this should be allowed for in the design.
- 6.29 In addition, the proposed plans should ensure the health of veteran trees and, in so doing, they cannot rely on Buffer Zones / RPAs in the land of adjacent owners as the developer would have no control over that rooting area.
- 6.30 A planning appeal decision in the borough made this position plain. Appeal Decision APP/X0360/W/17/3169773 re Land to the rear of 5 and 7 Rowan Drive, Crowthorne RG45 6RY stated:
- Most of the contiguous area of the RPA is within neighbours' gardens, over which the appellants have no control. The Council raises the possibility that development may occur within the offset RPA, thereby counteracting the effect of the offset. Permitted development rights exist to construct outbuildings and other incidental structures, and whilst there is no evidence that such development is likely to take place, as it is beyond the appellants' control, it cannot be discounted. Moreover, there is little scope to improve*

the soil environment; the area of garden immediately adjacent to the proposed house is that which is likely to be the most intensively used, and the appellants have no ability to improve the soil environment in the remainder of the RPA which is in other ownership. I therefore find that the proposal is likely to pose a threat to the health of trees which make a contribution to the amenity of the area, and this adds to my concerns.

- 6.31 So then we see that Buffer Zones / RPAs should not just be drawn as circles with no regard for 'pre-existing site conditions or other factors'. Specific examples will be discussed in the section on 'Impacts on ancient or veteran trees', later in this report.

Buffer Zones are specified in The Governments Standing Advice - *Ancient woodland, ancient trees and veteran trees: advice for making planning decisions*. It is important to note that whilst RPAs are about the protection of soil and root systems of trees and Buffer Zones are about protecting the irreplaceable habitat, in ancient or veteran trees the two terms are practically interchangeable and indeed they are often used interchangeably. For example in the Standing Advice, in the section on 'Buffer Zone Recommendations' it states:

The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.

VETERAN TREES ON AND ADJACENT TO THE SITE

- 6.32 Trees on and adjacent to the site are shown, by reference to the Ancient Tree Inventory² to be at least veteran trees for the purposes of NPPF

² [Ancient Tree Inventory - Woodland Trust](#)

paragraph 193(c). This is a point that is, on the whole, agreed by the appellant and, their arboriculturists Mr Wilkins.

6.33 The following table is based on data from the Arboricultural SoCG, the Ancient Tree Inventory (accessed 2/2/2026), the Appellant's Arboricultural Impact Assessment and Tree Condition Survey (AIA – November 2025), and the Wokingham District Veteran Tree Association Map³ (accessed 2/2/2026). The table shows: each tree; its number in the AIA; and its status according to the appellant, the Council and the Ancient Tree Inventory:

TABLE 1: ANCIENT OR VETERAN STATUS OF TREES (SITE AND ADJACENT)

Tree Condition Survey number	ATI number	Status according to appellant	Status according to WBC	ATI status	Notes (NB first survey date taken from WDVTA map where girth and recorded location tallies with ATI map). Girths for 2025 extrapolated from diameters given in AIA and TCS
T3 Oak	Not yet recorded	Veteran	Veteran	Not yet recorded	Girth apparently estimated at 3.14m (2025)
T4 Oak	218111	Veteran	Veteran	Veteran	WDVTA Girth 4.15m at 1.5m when first recorded (19 May 2007), Girth now 3.77m (2025) – 3 large co-dominant stems from 3m
T39 Lime	Not yet recorded	Veteran	Veteran	Not yet recorded	WDVTA Girth now (2025), with layered scaffold limbs and regeneration halo to NE of main stem
T50 Oak	Not yet recorded	Veteran	Veteran	Not yet recorded	Girth now 3.61m (2025)
T56 Oak	Not yet recorded	Veteran	Veteran	Not yet recorded	Girth 3.61m (2025)

³ [WDVTA - Wokingham District Veteran Tree Association Survey Map](#)

T72 Oak	45537	Veteran	Ancient	Veteran	WDVTA Girth 5.54m when first recorded, now (2025) 5.85m
T85 Turkey Oak	Not recorded	Worthy of consideration see SoCG	Worthy of consideration see SoCG	Not recorded	A mature multi-stemmed tree growing adjacent to and just beyond the eastern boundary of the site.
T87 Oak	45540	Notable	Notable/veteran	Notable	WDVTA Girth 3.40m at 1.50m on 22-Jun-08, now estimated at 3.14m (2025) - An off-site mature tree growing close to the western boundary of the site. 'has a long remaining life expectancy'.

6.34 Whilst there is disagreement over the status of T72, the SoCG confirms that, whether it is ancient or veteran, will not affect how it is addressed in terms of the NPPF or Standing Advice. The only difference is that, because of their great age compared with others of their species, ancient trees are much rarer than veteran trees.

6.35 All the trees in Table 1 are shown on the Appellant's AIA.

6.36 In addition, there are other ancient or veteran trees adjacent to the Highways works proposed for the length of Reading Road between the site entrance works and Arborfield Cross.

6.37 These are as shown in Table 2 below.

TABLE 2 VETERAN TREES ADJACENT TO READING ROAD BETWEEN THE SITE ENTRANCE AND ARBORFIELD CROSS

Tree Condition Survey number	ATI number	Status according to appellant	Status according to WBC	ATI status	Notes (NB first survey date taken from WDVTA map where girth and recorded location tallies with ATI map).
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N/A	164620		Veteran	Veteran	Record Number: 5958 (Recorder: ANBT15) Grid reference: SU 75623 67340 Oak (Maiden, Alive - standing) Girth: 3.45m(est.) at 1.50m on 2 March 2012, Setting: Ditch + Boundary (ancient or modern)
N/A Oak	217982		Veteran	Veteran	WDVTA Record Number: 5287 (Recorder: ANBT15) Grid reference: SU 75805 67282 Oak (Maiden, Alive - standing) Girth: 3.57m at 1.50m on 17 July 2011, Setting: Roadside + Field Boundary
N/A Oak	163828		Veteran	Veteran	WDVTA Record Number: 5287 (Recorder: ANBT15) Grid reference: SU 50m on 17 July 2011, Setting: Roadside + Field Boundary.

6.38 The following map (Figure 1) is taken from the ATI. It shows the positions of veteran trees notes in the table above, this map can then be cross referenced with the Highways engineer's plans. Please note the position of T87 at the top of the map, a tree immediately adjacent to, and overhanging, the eastern boundary of the site. Please also note a number of veteran oaks running south from 164620. These trees follow the line of BOAT.



FIGURE 1 VETERAN TREES ALONG READING RD FROM THE SITE ENTRANCE TO ARBORFIELD CROSS

A TIGHT LAYOUT – LIMITED SPACE FOR CONSTRUCTION

6.39 The Council has concerns in respect of the illustrative layout which currently relies on amenity space, gardens and pathways, other structures and drainage works within the required Buffer Zones /RPAs or compensatory off-set Buffer Zones / RPAs of ancient or veteran trees.

6.40 In addition, the original illustrative masterplan and the amended illustrative masterplan appear (CD18.11) together rely on introducing activities such as gardening and informal recreation into the Buffer Zones / RPAs of ancient or veteran trees, introducing far higher levels of human activity and far greater numbers of ‘targets’ (people) which would put pressure on the trees, either directly harming them or requiring more intensive future management that would harm them.

6.41 Whilst the only works currently proposed for trees T3 and T4 are ‘removal of deadwood over the highway’ The appellant’s AIA states for T4 that: ‘We consider that some remedial works may be beneficial but recommend a climbing inspection. Stabilisation of a veteran tree for its own well-being is

one thing, (and this may be what it intended in the AIA), stabilisation of the tree because the site has been developed and there are now more human 'targets' should it fail, is another and such indirect harms should be addressed through the mitigation hierarchy with avoidance being the top priority. No other works are currently proposed for veteran trees, but this is not to say that, with increased people pressure on the site, no works will be needed for human health and safety grounds. Currently there are minimal human health and safety demands on most of the ancient or veteran trees on site (barring T3 and T4 which have an enhanced requirement for management due to their closer proximity to the highway).

6.42 In my view, there is insufficient space in the indicative layout to allow for compensatory off-setting to allow for existing roads and for proposed new structures for the proper retention of sufficient RPAs/Buffer zones. For example, parts of RPA/Buffer Zones are owned by neighbours and are therefore outside the control of the appellant, and parts of RPAs/Buffer zones under the hostile environment of the adjacent Reading Road and associated infrastructure.

6.43 Of course, I accept that the layout is indicative only (apart from the access) but, as shown, it is unacceptable. Further, and even if the layout could change, far more open space land than is shown on the indicative layout will be needed for buffer zones and the layout will need to include appropriate ecological networks and green infrastructure. Unless it is demonstrated that there is a layout that could achieve the necessary buffer zones, I am not satisfied that it would be feasible to do so.

- 6.44 The constraints in the indicative layout currently threatens ancient or veteran trees. In addition, any rearrangement of the indicative layout to make this happen will likely impact on the LVIA.

BUFFER ZONES / RPAS AND IMPACTS ON ANCIENT OR VETERAN TREES

- 6.45 As discussed above the Standing Advice gives detailed guidance on Buffer Zones / RPAs for ancient or veteran trees; what they should be and what they should not be.
- 6.46 But in all the detail of the Standing Advice the key issue is space.
- 6.47 One of the key aspects of Buffer Zones / RPAs for ancient or veteran trees is that they should contribute to wider ecological networks, be part of the green infrastructure of the area and consist of semi-natural habitats such as woodland or a mix of scrub, grassland, heathland and wetland.
- 6.48 Apart from issues over the need for a compensatory off-set Buffer Zone / RPA for T3, T4 and T50 and how this impinges on the provisions for drainage infrastructure there is the issue of how the trees are in competition with each other for rooting space and volume, water and nutrients and how this has affected their roots. I consider it likely that the inhospitable sub base of the road and competition between these trees roots will have pushed the roots of tree T50 further into the site than has currently been realised and that it is likely to be the case that there is a sufficient incursion of the compensatory off-set Buffer Zone / RPA of T50 for the illustrative layout to be altered to remove pathways and the bunding required for the attenuation pond from that Buffer Zone / RPA.

- 6.49 With regard to the space allowed for the Buffer Zone / RPA of the veteran Lime, T39, this tree has collapsed to the north-east with scaffold branches layered and shooting where they touch the earth. As a result, the tree is 'walking' across the landscape as crack willows (*Salix fragilis*) and other willows often do in wilder less closely managed agricultural landscapes like this.
- 6.50 The result of this is that the Buffer Zone / RPA shown on the AIA is too constrained. The tree is moving out of it. It is important that this Buffer Zone / RPA is widened to include the layering and regenerating parts of the tree (what looks like a thicket of young limes but is actually just a rejuvenated reincarnation of the original tree).
- 6.51 In addition, the Illustrative master plan shows a footpath running through the Buffer Zone / RPA and this is contrary to the default position in paragraph 5.3.1 of British Standard 5837 (2012) and the Standing Advice on development and ancient or veteran trees.
- 6.52 I note that (assuming the two NPPF tests over the matter of damage to ancient or veteran trees have been met – see notes on the government's Standing Advice - above) then the issue of mitigatory Buffer Zones / RPA appears to have been resolved for this veteran tree in the latest iteration of the Indicative layout (Drawing Number 052403-DAN-MP04-ILUP) of 4th February 2025.
- 6.53 I include both versions of the indicative layout here to aid rapid comparison:

FIGURE 3 INDICATIVE MASTERPLAN DATED 4 FEB 2026

- 6.54 Oak T56 grows on the northern boundary of the site with two low limbs reaching] out to the south, one reaching as low as 1.5m. This area is shown as part of the garden of a house in the indicative layout. The Standing Advice is very clear about designs that include Buffer Zones / RPAs in gardens. It states: 'You should not approve development proposals, including gardens, within a buffer zone'.
- 6.55 I note that in the latest Indicative Masterplan the garden has been moved to create an area marked in red and captioned 'no development or private gardens within RPA area' in the new Indicative land use plan (Drawing Number 052403-DAN-MP04-ILUP) of 4th February 2025. It is not clear yet how impacts on this veteran tree of the close proximity to domestic dwellings will be mitigated or compensated for or the land will be managed or how the Buffer Zone / RPA contributes to wider ecological networks, as required by the Standing Advice, or how this may be secured.
- 6.56 In addition, half of buffer zone of this tree is within the private garden of a large residence to the north of the site. However, according to the Standing Advice, buffer zones should not include gardens. So then, adequate mitigation to the veteran tree there should be offsetting of the buffer zone within the area of the site which, as a currently low intensity agricultural area, has for many years provided a semi-natural wood pasture like habitat for the tree and its irreplaceable habitat. The compensatory off-set Buffer Zone / RPA should be all within the site and should be an area contiguous with the tree's location and of the area 15 times the diameter of the tree at breast height and in line with BS 5837 (2012) provisions for RPAs.

6.57 Coming now to the most prominent and spectacular of the ancient or veteran trees on site. T72 is at least a large veteran tree of 5.94m girth standing in a prominent position on the higher ground towards the eastern end of the site. It is currently shown as a focal point, labelled 'important vista tree' in the first indicative masterplan, with recreational space, a circular pathway and seating surrounding the tree and within the Buffer Zone / RPA in both the original and the amended Masterplan (CD18.11).

6.58 The Standing Advice states:

You and the developer should identify ways to avoid negative effects on ... ancient and veteran trees. For example, selecting an alternative site for development or redesigning the scheme.

6.59 The Standing Advice also describes the mitigation hierarchy stating: You should apply the mitigation hierarchy in line with NPPF paragraph 180a to avoid significant harm to biodiversity.

6.60 It should be noted that the Standing Advice states:

'If you decide to grant planning permission that results in unavoidable loss or deterioration where wholly exceptional reasons are demonstrated, you should use planning conditions or obligations to make sure the developer:

- *avoids damage*
- *mitigates against damage*
- *compensates for loss or damage (use as a last resort)*

6.61 So then rather than avoiding damage by design, ancient/veteran oak T72 is currently shown surrounded by 12 or 13 new houses (depending on which version of the Illustrative Masterplan one examines), with development

surrounding it on 290 degrees of the compass, with pathways and seating, and the tree is actually being used as a focal point and recreational area for the new development.

6.62The design approach in the amended masterplan is not materially different.

In the amended masterplan the tree will still not sit in a buffer zone consisting of 'semi-natural habitats such as: woodland' or a mix of scrub, grassland, heathland and wetland' as the Standing Advice states 'it should'.

6.63Indeed, I consider that both the original and amended masterplan will result in both direct effects and indirect effects that are almost certain to cause the loss or deterioration of this tree. They include the following taken from a list of direct impacts in the Standing Advice:

- *damaging or destroying all or part of them (including their soils, ground flora or fungi)*
- *damaging roots and understorey (all the vegetation under the taller trees)*
- *damaging or compacting soil*
- *damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland*
- *increasing levels of air and light pollution, noise and vibration*
- *changing the water table or drainage*

6.64In addition, I consider that both the original and amended masterplans will have indirect effects that will cause the loss or deterioration of ancient woodland, ancient and veteran trees by:

- *breaking up or destroying working connections between ... ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects*
- *reducing the resilience of the ... trees and making them more vulnerable to change*
- *increasing the amount of dust, light, water, air and soil pollution*
- *increasing disturbance to wildlife, such as noise from additional people and traffic*
- *increasing damage to habitat, for example trampling of plants and er*
- *increasing damaging activities like fly-tipping and the impact of domestic pets*
- *increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration*
- *changing the landscape character of the area*

6.65Because the proposals are outline apart from the access there are, necessarily no details of soil levels, drainage, road levels (and therefore issues of damming and pooling of water) etc. Absence of these details makes it extremely likely that more damage will be done to this tree, T72.

6.66In addition, no suitable compensation strategy has been proposed and, particularly, the need under the Standing Advice to: 'plant or protect individual trees that could become veteran and ancient trees in future' has not been met/

6.67 In fact, contrary to the Standing Advice, tree thinning of young oaks to in G73 and young oak T74 is proposed in the original masterplan in the first

and second instances and in, still, in the amended plan in the second instance.

6.68 Removal of G73 is contrary to best practice in the management of the nearby veterans. It is a high quality young tree of fine form and could easily be incorporated into a more sensitive layout. LONSDALE in paragraph 3.4.1.1 on the issue of 'management of other trees near veterans' states:

6.69 If shade is removed too rapidly, veteran trees can be killed by the abruptly increased exposure to direct sunlight and to wind. This results in unaccustomed moisture loss by transpiration. Also, previously shaded areas of bark and underlying sapwood can become overheated and, perhaps, thereby killed.

6.70 In addition, young trees, likely descendants of the adjacent ancient/veteran tree carry the genetic code of trees that tend to be naturally selected for longevity. They represent both the 'ecological networks' and 'green infrastructure' of the present and of the future as these young trees will be more likely to be the ancient or veteran trees of the future. They should be retained by design which could easily be achieved in the case of G73 by minor changes to layout, as advise in the Standing Advice section on compensatory planting or protecting of trees that could become veteran in the future.

6.71 On page 46 of LONSDALE under the heading '3.1 General guidance' it states:

Protect young and mature trees where they are the potential successors of the current generations of ancient and other veteran trees.

6.72 As the list of secondary impacts in the Standing Advice indicates, standing deadwood is a key feature of ancient or veteran trees. Where public access

is allowed under the trees canopy there will be greater pressure for the removal of this rare habitat feature, and possibly work to living but damaged branches with other rare habitat features, for public safety reasons. The Council could not reasonably resist such work in the circumstances of either proposed layout.

- 6.73 LONSDALE in a section headed '4.3 Deciding whether tree work is appropriate' states:

4.3.1 The need for caution Any form of work involving cutting is a form of damage, even though it might provide an overall benefit by helping to avert serious mechanical failure. It should therefore generally be kept to the minimum necessary for the purpose.

- 6.74 It is important to note that 'any form of work involving cutting is a form of damage' and designing in more likelihood of the need for tree works is the same as designing in damage to ancient or veteran trees.

- 6.75 On page 46 of LONSDALE under the heading 3.1 General guidance it states:

- 6.76 ... Be aware that veteran trees can be harmed even where the change of land use (e.g. from grazing to horticulture) involves disturbance that might not appear very radical at first sight.

- 6.77 What is proposed for T72 is radical change in land use from low level, low intensity agriculture to relatively high intensity amenity land with numerous and extensive alien features within the Buffer Zone / RPA

- 6.78 In addition, the Standing Advice requires that Buffer Zones / RPAs of veteran or ancient trees link with ecological networks and green infrastructure. The linkages of this tree to other ancient or veteran trees on the site will be made much poorer by the proposals especially by the wall of built form around in

on 290 degrees of the circle. Noise, light pollution and disturbance from the daily use of housing and vehicles will make this much worse.

6.79 It is clear that neither of the layouts follow the Standing Advice for this tree:

6.80 Not even the amended indicative masterplan secures this tree from damage to it and its irreplaceable habitats.

6.81 Without changes to Buffer Zones / RPAs to address these points it must be concluded that there will be damage to these veteran trees and their irreplaceable habitat.

6.82 Some, but not all, of the changes required here have now been shown in a new draft layout but as this new layout is not yet acknowledged as an appeal document before the Inspector there can be no certainty that these changes have yet, officially been made.

6.83 Furthermore, damage will occur to these trees and their irreplaceable habitats, the appellant admits this when entering into negotiations to mitigate harm which is the second stage in the mitigation hierarchy after 'avoid' harm. Veteran tree Buffer Zones / RPAs, however good, are still only mitigation of harm not avoidance.

6.84 Tree T87 along the eastern boundary of the Site is considered by the Council to be important in terms of landscape and bio-diversity value and links with the wider ecological networks (including off-site Veteran Tree number 164620 on Ancient Tree Inventory Database).

6.85 I consider T87 to possibly be a Veteran tree and it should therefore be treated as such as a precaution. The Appellant agrees in the Arboriculture SoCG that this oak tree merits consideration during the design of the layout. This tree is shown on the ATI as a notable tree with a girth of 3.4m at the time of survey (tree reference 45540). Further research indicates that this

tree was surveyed by the Wokingham Veteran Trees Association on 22 June 2008 (WDVTA tree number 2368) and measured as having a girth at 1.5m of 3.4m. It seems that measurement came at that time.

6.86 A large oak, situated in a garden behind a drainage ditch flanking the southern side of Reading Road, to the south of ATI tree number 164620, was also recorded by WDVTA (their tree number being 5958) on 2 March 2012, where it was shown as having a girth estimated as 3.45m at 1.5m above ground. The ATI includes this tree as a 'veteran' and gives it the ATI number 164620.

6.87 The following map shows the location of those ATI trees nearest the site (with their numbers superimposed). Other veteran trees grow flanking the Reading Road to the east. The are discussed in a subsequent section.



FIGURE 4 SHOWING EASTERN AGGREGATION OF VETERAN/NOTABLE TREES

6.88 Even allowing for the inclusion of the newly discovered veteran trees the functional ecological networks and green infrastructure linkages for ancient and veteran tree habitat are around an eastern group of trees and a western group. The western group has linkages north-west (towards the old medieval

Arborfield) and south (towards trees around Greensward Lane and Pound Copse ancient woodland). The eastern group has linkages from the ancient/veteran oak T72, south to link with veteran trees on Reading Road and those along Byway Open to All Traffic ARBO19 and thence to Arborfield Park Recreation Ground. There are also links from the eastern group with trees to the north along BOAT ARBO3 and north-east along Church Lane and the B3030 Mole Road and BOAT ARBO8 and thence to Bearwood Park and the Combes with their large numbers of ancient and veteran trees and areas of ancient woodland.

- 6.89 The functionality of ecological networks and green infrastructure are addressed by a PhD thesis from Skipp KS⁴, (CD18.13), which indicates that linkages are better the shorter they are. In addition, linkages are better where they contain features such as hedgerows. About which SKIPP states: *Hedgerows can act as corridors to aid species movement between woodland patches (Zhang & Usher, 1991; Beier & Noss, 1998; Petit & Usher, 1998). Woodland associated mammals, birds and invertebrates benefit from the structural complexity of hedgerows as protective cover when moving across otherwise more hostile landscape types (Davies & Pullin, 2007). Such connectivity positively influences gene flow and the resilience of species to changing conditions such as those brought by climate change (Coulon et al., 2004; Heller & Zavaleta, 2009).*

⁴ SKIPP K S, Building resilient wooded landscapes: How can we support saproxylic invertebrates into the future? A thesis in partial fulfilment of the requirements of the University of East London for the Degree of Doctor of Philosophy, June 2023.

- 6.90 This is supported by the Standing Advice which under the heading ‘compensation measures’ states: ‘connect woodland and ancient and veteran trees separated by development with green bridges, tunnels or hedgerows’.
- 6.91 Measured from the map, T72 appears to be 95m away from the closest tree with evidence of features of veteranisation that are likely to be of value for saproxylic insects (the major group of ecological interest in the rare habitat provided by such trees. This, closest tree, is T78 and it has evidence of basal hollowing fungal fruiting bodies and crown retrenchment. Whilst the latter appears to be largely anthropogenic in origin, the result of barn construction to the immediate west, damage to the roots and aerial parts of the tree still present as deadwood features of value to fungi and saproxylic insects, the principal groups utilising such veteran tree habitat), This tree, T72 is in turn only 75m from the closest other veteran tree ATI 164620 to the south. There are further linkages via hedgerows with veteran trees along Reading Road to the east, towards Arborfield Cross.

IMPACTS ON ANCIENT OR VETERAN TREES (MAIN DEVELOPMENT)

- 6.92 As previously noted, the Standing Advice states that: *where a decision is made to grant planning permission that results in unavoidable loss or deterioration where wholly exceptional reasons are demonstrated, you should use planning conditions or obligations to make sure the developer:*
- *avoids damage*
 - *mitigates against damage*
 - *compensates for loss or damage (use as a last resort)*

6.93 The Standing Advice states that we should ‘apply the mitigation hierarchy in line with NPPF paragraph 180a [of the NPPF 2012 - now paragraph 193 in the NPPF 2024] to avoid significant harm to biodiversity’.

6.94 The Standing Advice then gives the following ‘mitigation measures’:

Mitigation measures will depend on the type of development. They could include:

- putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution
- measures to reduce noise or light
- designing open space to protect ancient or veteran trees
- rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations
- creating buffer zones

6.95 During discussions over the Arboricultural Statement of Common Ground some buffer zones have now been proposed under the latest iteration of the Masterplan (the amended Masterplan) and some rerouting of footpaths has been proposed (significantly to avoid some footpath incursion into the Buffer Zone / RPA of the ‘walking’ Lime).

6.96 However, the buffer zones the ancient, veteran or notable trees are not yet sufficient to ensure the protection of the trees of the irreplaceable habitat.

Notes on the buffer zones of specific trees are included below.

6.97 Whilst some additional space has been provided in the amended indicative layout, the rooting areas of trees 3, 4 and 50 are still impacted by their proximity to the Reading Road and their proximity to each other. In the same way branches of adjacent trees tend to adapt to fill the space but not cross

into each other's zones so their root systems grow with compensatory off-sets to avoid competition with each other and therefore tend to grow more extensively away from the group. I do not consider that sufficient space for the roots of these trees has yet been provided within even the amended layout.

- 6.98 Tree T39: (veteran lime – within red line boundary). The Council's concerns are over the shape and extent of the buffer zone; the footpaths and proposed land use shown within the RPA/buffer zones. Rooted layered branches are part of this tree and the Council agrees with Mr Wilkins, the author of the appellant's tree survey, that this regenerating growth should be retained and the tree fenced off.
- 6.99 Tree T56: (veteran oak - within red line boundary) buffer zones are shown to be in gardens in the original Masterplan and within private offsite land in both the original and latest. The former parts do not conform to the Standing Advice, and the latter parts cannot be relied on without unreasonably curtailing the adjacent landowner's right to enjoy their property, therefore the illustrative masterplan/land use plan do not demonstrate buffer zones that could be adequately protected. In addition, the ecological and green infrastructure linkages are weak and should be enhanced at the same time as the buffer zones are given compensatory off-setting in line with BS 5837 (2012) and LONSDALE
- 6.100 Tree T72: (WBC say 'ancient' oak, appellant's say 'veteran', the effect in policy terms is the same but an ancient tree is rarer – tree is within red line boundary). The Council has concerns over RPA/buffer zones, in terms of the design, layout, construction working-zone (CWZ), proposed uses and ecological linkages of the RPA/buffer zones as shown.

6.101 The Standing Advice calls for mitigation measures including the following:

- putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution
- measures to reduce noise or light
- designing open space to protect ancient or veteran trees
- rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations
- creating buffer zones

6.102 But the proposals include no screening barriers, no measures to reduce noise or light, no rerouting of footpaths (insufficient rerouting of footpaths in the second iteration of the indicative masterplan), insufficient and poorly laid out buffer zones, and a design of open space that positively encourages construction in it and around it, access to it, and fails to sufficiently link it with ecological networks. All of this would result in harm to veteran T72.

6.103 Also, the clearance of young trees from the RPA/buffer zone which are not only important in terms of the long-term future of the habitat resource but are very likely to be the progeny of the ancient/veteran tree.

6.104 Tree T87: (mature notable tree - outside red line boundary). This tree demonstrates some signs of veteranisation and should be treated at least as a veteran tree of the future and precautionary approach adopted. The illustrative masterplan/land use plan do not demonstrate buffer zones would be adequately protected nor that the obvious assemblage of ancient, veteran and near veteran/notable trees have been knitted together in the illustrative layout. This tree, as large as an Ancient Tree Inventory (ATI) veteran tree to the south, (ATI 164620) and should along with ATI 164620 be considered an

important part of ecological networks and green infrastructure designed around the RPAs/Buffer Zones of ancient or veteran trees. Importantly, the buffer zones should tie in with ancient or veteran trees including off-site trees, for example ATI 217982, 163828 linked by hedgerows along the Reading Road to the south-east (as should all ancient, veteran, notable and mature trees on and near to the site for example the group T3, T4, T50).

- 6.105 Of course, the layout is indicative only (apart from the access) but far more open space land will be needed for buffer zones including ecological networks and green infrastructure. Any rearrangement of the indicative layout to make this happen will likely impact on the LVIA.

HIGHWAYS WORKS AND ANCIENT OR VETERAN TREES

- 6.106 Of the three ancient or veteran trees adjacent to the proposed works to Reading Road, between the site entrance and Arborfield Cross, it is agreed that 164620 is unlikely to experience any significant root disturbance as it is set back from the pavement and behind a deep and wide ditch.
- 6.107 Veteran trees 163828 and 217982 are located in more intimate proximity to the metalled roadside pavement or the carriageway itself.
- 6.108 It is agreed that, with a suitable methodology, no harm need come to the root systems of the roadside Veteran trees. This is in the Arboricultural Statement of Common Ground.
- 6.109 There are, however, the issues of possible physical harm to the aerial parts of veteran tree 163828 when installing 6m street lighting columns (and possible requirements for ongoing canopy management which will cause some harm)
- 6.110 The engineers plan for this section of the road and lighting engineering works is shown in the plan segment below.

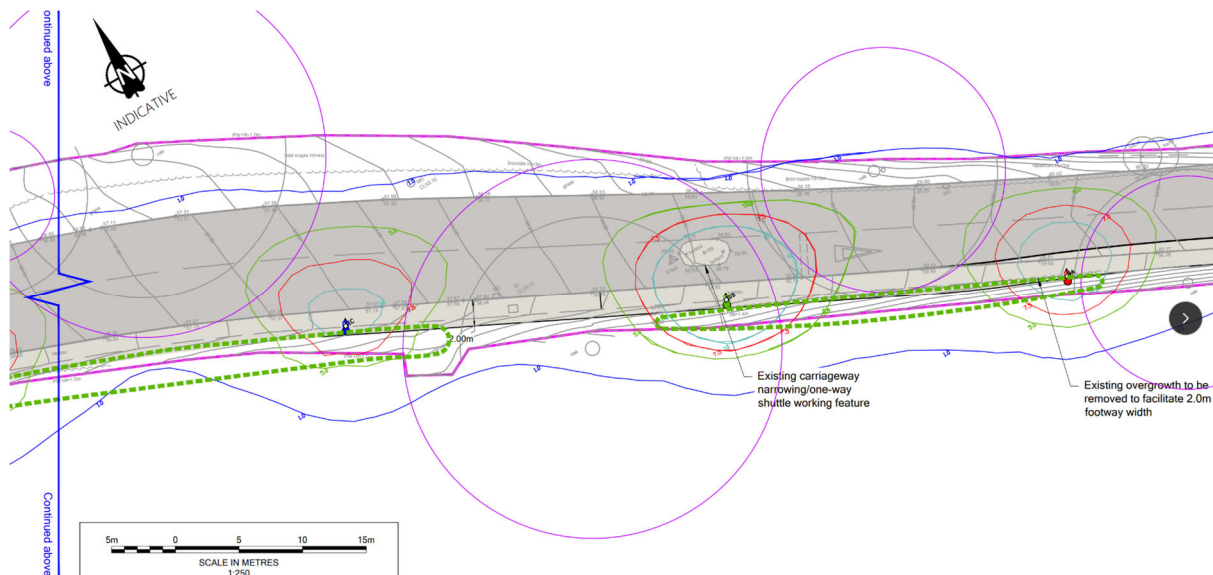


FIGURE 5 SECTION OF ENGINEERING PLAN ADJACENT TO VETERAN TREES ON READING ROAD

6.111 From this plan it will be seen that the lighting column is hard by the canopy shown for tree 163828 and within the Buffer Zone / Root Protection Area for this tree (which should be 15 times the diameter at base height in this case).

6.112 The ATI gives a 3.57 girth at breast height for this tree (surveyed on 17 July 2011 although it will now be some larger, open grown oaks in good condition adding some 2.5 cm a year to their girth). So a girth in 2026 of 3.92m (divided by π) gives a dbh of 1.25 m and a Buffer Zone / RPA of $15 \times 1.25 = 18.75$.

6.113 In addition, roughly half of the Buffer Zone / RPA for this tree is under pavement and carriageway so there should be provision for compensatory off-setting of the Buffer Zone RPA. The offset buffer zone should give the same area outside the pavement and carriageway as the standard circular Buffer Zone / RPA.

6.114 This RPA/buffer is not shown on the highways engineer's plans. The wide purple circle shown, is shown in the engineer's drawing key as the 'Existing Tree Root Protection Area'. However, it can be measured at 15m from the centre of the veteran tree and therefore it seems to be merely the capped

normal RPA for an ordinary tree, as specified in BS 5837 (2012), and is certainly not the off-set compensatory veteran tree Buffer Zone / RPA required to compensate for the pathway and carriageway, nor even the enlarged veteran tree Buffer Zone / RPA required by the Standing Advice.

6.115 However, there is a further complication here. Unless solar powered lighting is allowable, and there is no note on this, the lighting proposals would need a power supply unless it is intended that they are to be solar powered. This is not specified so, assuming the reasonable worst-case scenario, a trench for lighting cables will need to be excavated linking and powering the lighting columns. This would involve excavation in the compensatory off-set Veteran Buffer Zone / RPA of this tree.

6.116 But in any case, lighting itself is hard to mitigate for especially what the Standing Advice on Ancient and Veteran Trees and Development states as one of the options for mitigation. The Standing Advice states:

Mitigation measure will depend on the type of development. They could include: ...measures to reduce noise or light.

6.117 Far from reducing light pollution the very aim of the highways works is to increase levels of light around the road where these veteran trees and others grow.

6.118 In a section headed 'Providing evidence', the Standing Advice states:

You must make sure the developer includes mitigation measures in their development proposal to avoid and reduce harm caused by development on ancient woodlands, ancient and veteran trees. They may also need to include a suitable compensation strategy.

6.119 In the next section headed 'Avoid impacts, reduce (mitigate) impacts, and compensate as a last resort'; the Standing Advice states:

You and the developer should identify ways to avoid negative effects on ancient woodland or ancient and veteran trees. For example, selecting an alternative site for development or redesigning the scheme.

You should decide on the weight given to ancient woodland and ancient and veteran trees in planning decisions on a case-by-case basis. You should do this by taking account of the NPPF and relevant development plan policies.

If you decide to grant planning permission that results in unavoidable loss or deterioration where wholly exceptional reasons are demonstrated, you should use planning conditions or obligations to make sure the developer:

- avoids damage*
- mitigates against damage*
- compensates for loss or damage (use as a last resort)*

This is known as the mitigation hierarchy. You should apply the mitigation hierarchy in line with NPPF paragraph 180a to avoid significant harm to biodiversity.

6.120 In a later section headed 'Mitigation measures' the Standing Advice states:

Mitigation measures will depend on the type of development. They could include:

- putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution*
- measures to reduce noise or light*
- designing open space to protect ancient or veteran trees*

- *rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations*
- *creating buffer zones*

6.121 For the current highways lighting proposals this must include measures to reduce light pollution and relocating lighting columns away from veteran and other tree canopies.

6.122 The next section in the Standing Advice addresses the matter of Buffer Zones RPAs. Including that larger buffer zones are more likely to be needed if the surrounding area is less densely wooded.

6.123 This section gives advice on the size of buffer zones for ancient or veteran trees. It states that ‘the buffer zone should be at least 15 times larger than the diameter of the tree’ or ‘5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter’. It states that ‘This will create a minimum root protection area’.

6.124 The Standing Advice states that: ‘Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone’.

6.125 The Standing Advice states:

Where possible, a buffer zone should:

- contribute to wider ecological networks;
- be part of the green infrastructure of the area

6.126 And:

. *A buffer zone should consist of semi-natural habitats such as:*

- *woodland*
- *a mix of scrub, grassland, heathland and wetland*

6.127 The Standing Advice goes further stating:

The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.

6.128 None of the above assessment or mitigation by design has been carried out for this tree or its near neighbour to the north across Reading Road (ATI 217982). It is clear that the highways works have not fully addressed the Standing Advice nor the impact of the proposals on veteran trees.

6.129 The Standing Advice and 'Planning for Ancient Woodland Planners' Manual for Ancient Woodland and Veteran Trees' Woodland Trust October 2019' (CD18.14), and at page 17, give similar advice on the indirect effects of development on ancient or veteran trees and this is referenced elsewhere (quoting from the Standing Advice).

6.130 The Woodland Trust guidance⁵, (CD18.14) mentions light pollution in various contexts. On page 19 under the heading 'Mitigation' it suggests:

'Sympathetic design and use of appropriate lighting to avoid light pollution'.

This guidance does not appear to have been followed in this instance, and it is likely that the irreplaceable habitat of the veteran trees will be harmed if these proposals are approved.

6.131 The Bat Conservation Trust offers further guidance in partnership with the Institution of Lighting Professionals - GN08/23 Bats and Artificial Lighting At Night (CD16.04). This guidance does not appear to have been followed in this instance, and it is likely that the irreplaceable habitat of the veteran trees will be harmed if these proposals are approved.

⁵ Planning for Ancient Woodland Planners' Manual for Ancient Woodland and Veteran Trees (2019)

- 6.132 The sort of mitigatory measures required is specified by the Standing Advice and are addressed in the section on 'Buffer Zones / RPAs and impact on ancient or veteran trees'.
- 6.133 In any case the proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.

ANCIENT OR VETERAN? QUESTIONS OF GIRTH, ROT AND OTHER FEATURES

- 6.134 The appellants say that T72 is a veteran tree. I consider that it is an ancient tree. The issue here is that whilst ancient and veteran trees are dealt with in the same way in the NPPF and in the Government's Standing Advice, ancient trees are, in themselves, older and rarer than veteran trees and should, I consider, carry even more weight than veteran trees.
- 6.135 Applicants sometimes assess ancient or veteran trees making reference to figure 1.3 of the Ancient Tree Forum's book: Ancient and other veteran trees further guidance on management. Edited by the late David Lonsdale, and herein referred to as LONSDALE. It is the most up to date, practical reference work on ancient and veteran trees. This is good and appropriate but sometimes this figure is misinterpreted resulting in the under-estimating of the veteran or ancient status of trees.
- 6.136 Recalling the NPPF definition of ancient or veteran trees an ancient or veteran tree must have age, size and condition and it must be of exceptional value for either biodiversity, cultural or heritage value. Interestingly the government's new draft NPPF, currently undergoing public consultation, has changed the wording to 'age, size or condition', which appears to me to be

more accurate a definition. Nonetheless, Inspectors have made their own interpretation of the definition. From the Brislington Meadows appeal we see that a tree might also be considered to be veteran, for the purposes of planning, where it is 'either a veteran tree or at least should be treated as such because it is so close to being veteran.

6.137 Age and size are so closely related that it almost seems that the NPPF has resorted to double accounting.

6.138 On size, we have figure 1.3 of LONSDALE. But there is an error in interpretation which crops up from time to time which I address below.

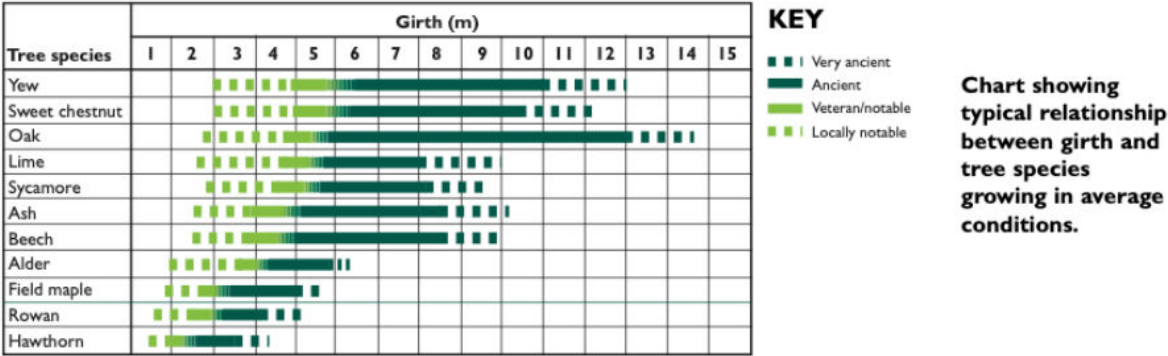


FIGURE 6 GIRTH CHART FOR VARIOUS SPECIES OF TREES FROM 'LONSDALE'

6.139 Some consultants interpret Figure 1.3 incorrectly. Taking the baseline or starting point of the columns on girth at 1m so that for an oak to be an ancient tree the girth must be around 5.7m (where the solid lime green line in the 'Oak' row of the table turns to a solid dark green). The correct interpretation is to read Figure 1.3 with the columns start with the line running down the extreme left of the 'Girth' columns, read as '0'. A clearer visualisation of this is presented below.

6.140 This misreading of the table is not an uncommon one.

6.141 As an aside size and veteran status are not always correlated closely. A photograph of a veteran tree is shown in the Woodland Trust's Veteran Tree Guide No 4 (2008), and shows a notably tiny tree, not much bigger than the walking boots in the background, that because of its features was classified as a veteran tree. See Figure below.



Not all veterans are ancient: a tiny veteran beech tree

FIGURE 7 NOT ALL VETERANS ARE ANCIENT A TINY VETERAN BEECH TREE

6.142 The scales of most tables, graphs, etc. start at zero. Especially where trees of many species and varieties will become veteran and then ancient at a wide variety of girths. The incorrect interpretation focuses too much on large species trees, particularly oaks, and leaves no room to factor in small trees at one end of the scale such as the wild crab apple (*Malus sylvestris*) or the

massive *Sequoiadendron giganteum* (the Wellingtonia) at the other. The first species, a native that normally grows to a girth of from 0.7m girth for a mature tree (notably below the 1m limit if Figure 1.3 is incorrectly interpreted) up to 2.8 for an exceptional ancient tree. The second an introduced species of parks and avenues (including the spectacular Wellingtonia Avenue in nearby Finchampstead) grows to an ultimate girth of over 30m (although it will take a few more hundreds of years for this quick growing species to reach these dimensions in the UK. The problem is that many consultants have not yet tested this table to the limit. As a biologist by training, I can see that it may be useful, sometimes, to start a scale at a number above zero, but not for tree girths that, clearly, start at zero.

- 6.143 To function as a method of comparison, to aid judgement and fairly stimulate thought, table 1.3 has to start where tables traditionally start, at zero.
- 6.144 But fortunately, this question occurred to me in 2020, and I sought out the late Dr Lonsdale's definitive view on this which he gave in an email to me of 8th March of that year (Appendix CH15).
- 6.145 Dr David Lonsdale, clarifying the situation stated:

The girth chart in Figure 1.3 has a design weakness, which can lead to a misreading of the girth columns in the chart. This is probably why your appellant thinks that a tree (oak) must be at least 4.7 m in girth to be a veteran. I have, however, been assured that the designer of the chart intended the girth columns to be read as follows:

*Column 1: 0.1 – 1 m
Column 2: 1.1 – 2 m
Column 3: 2.1 -3 m
Remaining columns: etc. etc.*

So, if we use Fig. 1.3 as its designer intended, an oak could qualify as a veteran with a girth of 3.75 m if it has other qualifying characteristics. It does not need to be 4.70 m in girth, as appears to be the case if the columns are read in a different manner.

6.146 It is important to note that Dr Lonsdale said: *'an oak could qualify as a veteran with a girth of 3.75 m if it has other qualifying characteristics'*. So then, to edit Figure 1.3 of LONSDALE, with my edits in blue we get a clearer, less ambiguous table:

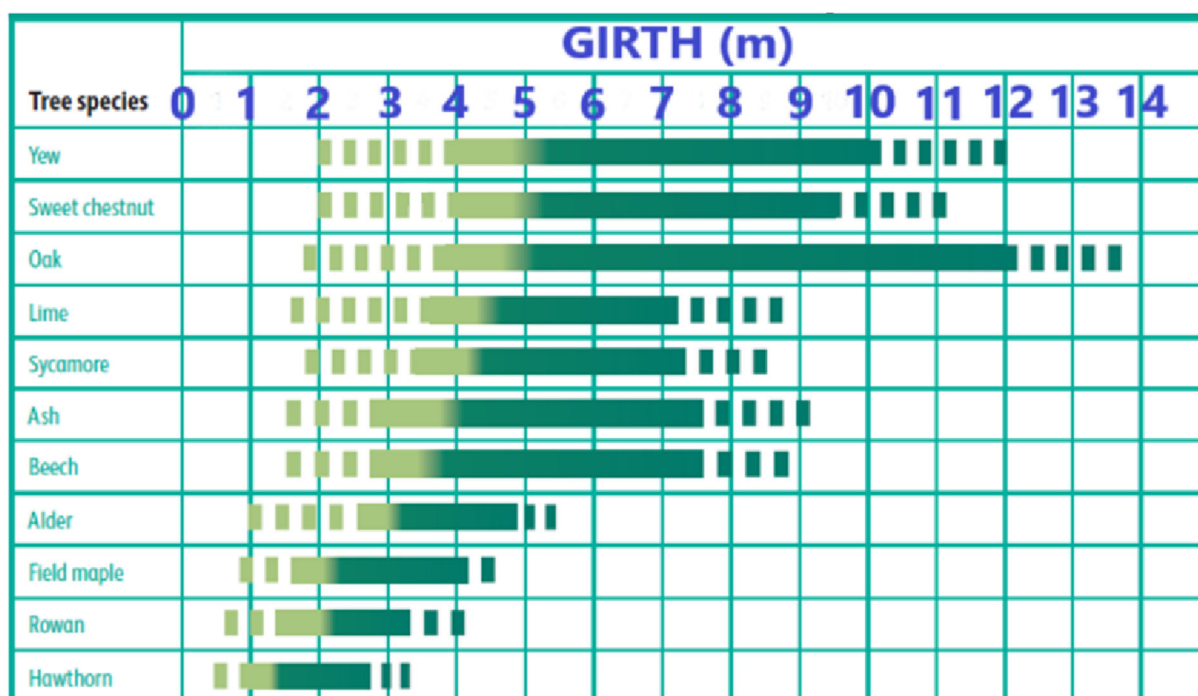


FIGURE 8 FIGURE 1.3 MODIFIED AND CLARIFIED TO ACCURATELY REFLECT DR LONSDALE'S EMAIL OF 8TH MARCH 2020

KEY

- ■ | Very ancient
- Ancient
- Veteran/notable
- ■ | Locally notable

6.147 Where Dr Lonsdale noted *'an oak could qualify as a veteran with a girth of 3.75 m if it has other qualifying characteristics'* so then inspection of the table (as amended per Dr Lonsdale's email) shows that an oak with a girth of 5.7m would qualify as an ancient tree.

6.148 Supporting this, the Natural England Biodiversity Net Gain (BNG) technical supplement, at page 20, Natural England gives a simple way of classifying of ancient and veteran trees. They state:

“Ancient trees can be classified using the following girth guide at 1.5m from the ground⁶:

- *>2.5m for field maple, rowan, yew, birch, holly and other, smaller tree species;*
- *>4m for oaks, ash, Scot’s pine and alder;*
- *>4.5m for sycamore, lime, horse chestnut, sweet chestnut, elm species, poplar species, beech, willows, other pines and exotics.*

6.149 Examining the amended unambiguous version of Figure 1.3 we can see that the new Natural England BNG guidance is more in line with this amended version of Figure 1.3 than with the unamended Figure 1.3. Oaks, for example, being seen as ancient tree when they reach 4m girth in the newest NE guidance, 4.7m in the amended Fig 1.3 (incidentally the measurement we used in the Wealden Ancient Tree Survey twenty years ago) as opposed to 5.7 in the unamended Figure 1.3 as it is often (wrongly) interpreted.

6.150 Similarly, smaller oaks (and other species) can be considered veteran in both the NE BNG guidance and the amended Figure 1.3, than in the unamended version.

6.151 Helpfully, the Natural England guidance continues:

⁶ FAY, N. & DE BERKER, N. (1997). Specialist Survey Method. Veteran Trees Initiative, English Nature. Peterborough

Veteran trees can be classified if they have four out of the five following features⁷:

1. Rot sites associated with wounds which are decaying >400cm²;
2. Holes and water pockets in the trunk and mature crown >5cm diameter;
3. Dead branches or stems >15cm diameter;
4. Any hollowing in the trunk or major limbs;
5. Fruit bodies of fungi known to cause wood decay. “.

6.152 So then, T78 might be considered a veteran if it were to have other qualifying characteristics. In this case it does have: dead branches or stems >15cm diameter, hollowing of the trunk, fruit bodies of fungi known to cause wood decay. Rot site and holes and water pockets are not apparent from a ground inspection.

6.153 However, it is important to note that absence of evidence does not equate to evidence of absence. In arboriculture as in ecology, and indeed, as in the cultural heritage (many ancient woodlands, ancient trees, historic parks and gardens, listed buildings, were on the map but not on the planning radar until they were placed on the relevant inventory, register, schedule etc.). Evidence can come to light through closer inspection or, for example, the development of new technology.

6.154 It is agreed in the Arboricultural SoCG, however, that T72 is at least a veteran tree and therefore an irreplaceable habitat. It is also agreed that T78 is a tree that ‘merits consideration during the design of the layout’.

⁷ The Biodiversity Metric 2.0 - JP029 (naturalengland.org.uk)

6.155 Of course, a tree that is 'either a veteran tree or at least should be treated as such because it is so close to being veteran' can be treated as a veteran as in the Brislington Meadows appeal.

6.156 No detailed assessment of the ecology of the trees on the appeal site has been made but the Inspector will note that absence of evidence on ecological value is not evidence of absence of ecological value.

6.157 Additionally, whilst no specialist survey of the ecological habitats of the ancient and veteran trees has yet been carried out, the appellant's Preliminary Ecological Appraisal report indicates that bats are likely to be present, and it recommends further survey. It also indicates trees with 'BP' or bat potential including, apparently, T1 and T14 although the ecological survey numbering does not appear to be consistent with the arboricultural survey numbering.

6.158 For ease of reference LONSDALE gives examples of specialist surveys that should be carried out on ancient and veteran trees on page 119. It states: Although it is desirable to know as many as possible of the species that are present, a sound management regime can, and should, be based on an understanding of the requirements of key groups of fauna and flora that are known (or are likely) to be present. In relation to habitats associated with veteran trees, the key species groups that should if possible be included in specialist surveys are as follows:

- fungi (wood-decay and mycorrhizal)
- lichens (epiphytic)
- invertebrates (wood decay, mycorrhizal and epiphyte assemblages)
- cavity-using birds and bats.

6.159 Another key but not intuitive point about ancient and veteran trees is the presence of dead wood, in the canopy, in the bole or trunk, and in the ground where it is key habitat for various saproxylic insects amongst other groups.

7.0 IMPACTS AND EFFECTS OF THE PROPOSALS ON LANDSCAPE

POLICY, IMPACTS AND EFFECTS

- 7.1 The arboricultural and landscape impacts of the road works are addressed elsewhere in the Proof of Evidence. This section concentrates on the landscape and visual impacts of the housing proposals, the various means of access and the proposed attenuation ponds.
- 7.2 I have shown in a previous section that the proposals would not ‘function well’ when it comes to ancient or veteran trees, they would put pressure on Buffer Zones / RPAs and introduce high levels of human activity necessitating far more invasive and intensive management that is unlikely always to be to the benefit of those trees. Harm to such trees would equate to harm to the landscape and would be contrary to NPPF paragraph 135(a).
- 7.3 Contrary to NPPF 135(a) the proposals do not ‘add to the overall quality of the area’. Again contrary to paragraph 135 there is nothing about the proposals that signifies that they will be (b) ‘visually attractive’. At best the only evidence on these issues is that an ordinary suburban housing scheme will be built and screened by existing and new landscape. But, laying aside for the moment that developers should not rely on landscaping to make palatable what is otherwise unpalatable in planning terms nor rely on landscape screening to hide a visual intrusion (see note on this at the end of this proof of evidence), I consider that this ordinary suburban housing

scheme will appear as an intrusive element in the countryside, to those looking into the site from the pavement, cars, busses and other forms of transport along Reading Road particularly so in winter, and particularly so at night. The LVIA has not addressed the issues of light pollution or winter views.

- 7.4 Looking now at the issue of landscape works, there is little space apportioned in the indicative masterplan. And the amended indicative masterplan is worse in this regard as, because of ancient or veteran tree constraints, drainage issues and public open space requirements the development has become yet more concentrated around the Reading Road frontage and the proposed access. But even if more space were allowed for planting the approach of simply hiding what is unacceptable in planning terms is wrong as previously discussed.
- 7.5 Paragraph 135(c) requires that planning decisions 'should ensure that developments ...are sympathetic to local character and history, including the surrounding built environment and landscape setting'. These proposals would occupy the agricultural hinterland of the former settlement of Arborfield and in space that the historic map evidence shows was outside the parkland of Arborfield Hall and divorced from any settlement. Other than as agricultural land, it was never part of the medieval 'vil' of Arborfield nor has it ever been part of the late medieval/early modern settlement of Arborfield Cross.
- 7.6 Paragraph 135 d) requires that planning decisions should ensure that developments 'establish or maintain a strong sense of place', ('using the arrangement of streets... to create attractive, welcoming and distinctive places to live, work and visit'). But there is nothing distinctive about the

proposals so far apart from unnatural attenuation ponds with high bunding which is visually intrusive and a veteran or ancient tree surrounded by amenity space as a – a bolt on solution, chasing a need for amenity land, that does nothing to satisfy the requirements of the Buffer Zones / RPAs of the irreplaceable habitat (see elsewhere for more on this matter). Other than these lamentable examples of design, and the fact that the site is open countryside, there is distinctive about these proposals. In terms of distinctiveness, they are like any other suburban development. Far from establishing or maintaining a strong sense of place the proposals undermine the established pattern of development and countryside, they undermine the quiet ‘rewilding’ and the *‘layering of the vegetation from grassy open space to native scrub, emerging into small to mature trees some of which mark the field boundaries from the historic landscape’*, as the Council’s Landscape Architect put it.

- 7.7 Paragraph 135 requires developments to (e) ‘optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space)’ and yet the proposals rely on double accounting. Using the Buffer Zone / RPA for the development of paved paths, seating and amenity space, contrary to the Standing Advice - *Ancient woodland, ancient trees and veteran trees: advice for making planning decisions*. aa
- 7.8 In addition, and because of the need for attenuation ponds perched above the very high water table the site is further cramped and space for amenity, landscape and trees is, therefore, also cramped.
- 7.9 Outside Valued Landscapes NPPF 187 requires that planning decisions ‘contribute to and enhance the natural and local environment by’ (b)

‘recognising the intrinsic character and beauty of the countryside,... and of trees and woodland. The way that, rather than ‘contribute to and enhance’ the natural and local environment and countryside, the proposals would undermine the character and quality of the countryside has already been discussed, and it is clear and obvious that the proposals will not, cannot in any real sense, contribute to and enhance the natural and local environment. What is proposed, even in outline, is ordinary and suburban at best.

- 7.10 Paragraph 193 of the NPPF deals with biodiversity including ancient or veteran trees. Biodiversity and, particularly in this case, ancient or veteran trees, are, an important component of landscape but the impacts on these ‘irreplaceable habitats’ are discussed elsewhere. However, one point to highlight is that such trees are particularly vulnerable and introducing 111 dwellings with many more residents into their landscape will put them at risk. In arboricultural terms people are ‘targets’ the way we manage trees is to carry out necessary works to reduce risk to people. The very best way to manage a tree to remove risk is to remove the people. All other methods of management involve some element of likely harm to trees.
- 7.11 Core Strategy policy CP1 states that planning permission ‘will be granted’ for proposals that: 1) maintain or enhance the high quality of the environment. As previously discussed the proposed scheme would undermine the quality of the environment.
- 7.12 Core Strategy policy CP3 states that planning permission ‘will be granted’ for proposals that: (a) are of appropriate scale of activity, mass, layout, built form, height, materials and character; (c) have no detrimental impact on important heritage or landscape features; (f) contribute to a sense of place in the buildings and spaces in the way they integrate with their surroundings

...including the use of appropriate landscaping. These issues have been discussed above and it has been shown that the appeal scheme is too big for the site given the drainage and ancient or veteran tree constraints), so much so that even the amended illustrative masterplan robs Peter to pay Paul, taking land for ancient or veteran tree Buffer Zone / RPA to give to 'Landscape Amenity Green Space' and, indeed, apparently conflating space for planting with space for amenity (see Indicative Land Use Plan CD18.09).

- 7.13 Further, development proposals are required to demonstrate how they have responded to the above criteria through documentation. As this is an outline application the only pieces of evidence we have are the original illustrative masterplan, the amended illustrative masterplan and the Indicative Land Use Plan). None of which can it confidently be argued that the scheme achieves the aims of policy CP3.
- 7.14 Policy CP11 seeks to 'protect the separate identity of settlements and maintain the quality of the environment' and sets out strict criteria where development outside settlement limits is allowable. The default being that it is not. In this case the proposals would certainly be urbanising and the works to the Reading Road, including lighting columns and other works, all the way from the site to Arborfield Cross, would certainly work to coalesce the settlements and urbanise the countryside. The impacts are discussed in more detail in the section on the 'Impacts/Effects on the Green Route'.
- 7.15 Policy CC03 addresses Green Infrastructure, Trees and Landscaping. The specific impacts on the Reading Road Green Route are addressed elsewhere but CC03 requires proposals to 'demonstrate' how they have considered and achieved a list of criteria and how they 'provide new or

protect and enhance green infrastructure'. The current proposals do not provide any significant green infrastructure, indeed they fail to protect it.

7.16 The proposals do not, as required by CC03(c) 'promote the integration of the scheme with adjoining public space or countryside' and this is particularly obvious along the road frontage with its new pedestrian access points, emergency access and the wide, well-lit vehicular access with signage and road markings as required for road safety reasons. It is also highly evident when looking at proposals for road improvements with new bus stop build out, dropped kerbs and crossings, street lighting and widened pavements all the way up to Arborfield Cross.

7.17 In addition the proposals do not, as required by CC03 (d) 'protect and retain trees, hedges and other landscape features'. Again the road works will remove substantial amounts of greenery including trees at the main entrance and may require pruning to roadside trees around lamp standards on Reading Road; the proposals allow for insufficient space to mitigate ancient or veteran trees and; contrary to paragraph (e) there is little significant space for planting and landscaping where it is most needed in amongst the proposed houses along the Reading Road frontage. CC03 concludes stating that proposals resulting in the loss or fragmentation of green infrastructure 'will not be acceptable'.

7.18 Most importantly policy TB21 addresses Landscape Character and requires that 'proposals must demonstrate' how they address the requirements of the Wokingham Borough Landscape Character Assessment (2019) including: 'landscape quality, landscape strategy, landscape sensitivity and key issues'.

7.19 Further, 'proposals shall retain or enhance the condition, character and features that contribute to the landscape'.

- 7.20 The effects on landscape character are many. Some effects are discussed elsewhere. Key here are that the proposals would be in line with the landscape strategy which for both C1 and J2 LCAs can be summed up as: C1 to conserve and enhance the quiet rural landscape with scattered settlements and rural lanes, hedgerows and trees, as well as open views. And J2 to conserve and enhance the rural character, conserve and enhance the field pattern with mature hedgerow trees, wetland ...rural lanes.
- 7.21 For the C1 LCA the landscape strategy, in terms of development, is to conserve the sparse settlement pattern, minimising primary and secondary influences from adjacent landscape areas.
- 7.22 For the J2 LCS the landscape strategy, in terms of development, is to integrate *new development into its landscape setting, and retain the open and rural character of the landscape between settlements.*
- 7.23 Of course, the development fails to conserve the sparse settlement pattern of the C1 LCA and at the same time fails to integrate into the landscape setting of the J2 LCA. It also fails to retain the open and rural character of the landscape between settlements.
- 7.24 Importantly 'landscape guidelines' for both LCAs include: '*Conserve the open and rural qualities of the ...landscape*' as well as '*Maintain the rural character and sparse settlement pattern of Arborfield and dispersed farms through control of new development and avoiding spread of development into the area.*

7.1 The C1 LCA requires that we '*Resist the development of large or tall structures which could obscure the open views across the open*

landscape’ and *‘sensitive lighting to retain dark skies at night) to minimise the impacts of any potential new development on valuable landscape attributes’*. The J2 LCA ‘landscape guidelines’ requires *‘sensitive lighting to retain dark skies at night) to minimise the potential impacts of any new development on valuable attributes’*. The lighting columns across the site, at access points, and particularly along the Reading Road do not comply with this.

7.2 In addition, the C1 LCA requires that planning should: *‘Protect the perceptions of tranquillity/remoteness dark skies in the landscape, through the management of development, ensuring development, including infrastructure, does not spread into the river terrace*. Again the lighting required for the main entrance to the site and in the site will mean that the proposals will not comply with this’.

7.3 Both sets of ‘landscape guidelines’ require that the sense of place is enhanced through ‘careful design’. As noted elsewhere, the choice of a countryside location unrelated to any settlement, the attenuation pond bunding, the retrospective street lighting down the Green Route, the lack of consideration of space for ancient or veteran trees, the double accounting of recreational space and Buffer Zones / RPAs all point to lack of care in the design.

7.4 Both LCAs have the following landscape guideline: *‘Maintain and enhance the character of rural lanes resisting unsympathetic highways improvements, infrastructure and signage’* and for the J2 LCA this is to be observed; *‘particularly in the most rural areas’*. As discussed elsewhere, particularly in the section on the Effects on the Green Route, the proposals

significantly fail to meet these guidelines and therefore the TB21 policy objectives.

7.5 The J2 LCA requires that proposals '*Protect the individual identity of towns and villages, and retain their sense of physical and visual separation*' and '*Conserve and protect the landscape pattern of mixed pasture and arable fields*'. The proposals clearly do neither.

7.6 'Key Issues' for the C1 LCA include: *Demand for residential ...development and supporting infrastructure ...continuing to push development onto the river terrace impacting the rural and tranquil character of the area; Demands for upgrading the winding network of rural lanes with new signage, line painting and widening changes the intimate rural character of the lanes; Increasing demand for communication masts, pylons and poles leading to visual intrusion of these elements in the open landscape.*

7.7 These are all features of the current proposals (including the upgrading to Reading Road and all undermine the intimate rural and tranquil character of the C1 LCA.

The J2 LCA 'Key Issues' include: *Drainage operations have resulted in loss of wetland habitats. This threat continues as a result of drainage schemes associated with new building works and agriculture; Pressure for large scale residential development and supporting infrastructure impacting landscape character; Increased traffic on rural roads due to expanding residential development in the area leading to loss of tranquillity, erosion of road verges and increased levels of air pollution in rural areas; Light pollution at night causing 'sky glow'.*

7.8 These are all features of the current proposals (including the upgrading to Reading Road and all undermine the low-lying, wet and tranquil character of the J2 LCA.

7.9 In addition, the J2 LCA identifies: *'High demands for recreation' continuing to threaten the 'tranquillity of the landscape'. With 'Recreational pressure' leading to 'erosion of special ... landscape features and is a continuing problem in this well-populated borough'.*

7.10 Echoing 'Key Issues' for the CI LCA the J2 LCA identifies: *'Increasing demand for communication masts, pylons and poles leading to visual intrusion of these elements in the open landscape'*. This is discussed fully in the section on the impacts of the development on the Green Route but it is worth mentioning here that the LVIA does not address issues of the intrusion of lighting columns and particularly light pollution from any aspect. Particularly important will be the intrusion and pollution from the high (eastern) end of the site, closest to Arborfield Cross, the intrusion and light pollution affecting the Green Route and the impacts on the Green Route all the way up to Arborfield Cross.

A SUMMARY OF EFFECTS

7.11 What will be the result of the proposals, fields will be replaced by houses; dark night skies will be lit up, natural forms will be lost and unnatural forms will replace them, the countryside will be urbanised, ancient and veteran trees will be compromised. Even the mitigation proposed does not meet the criteria set out by government for approval. The Green Route, currently recovering as a country lane as the traffic has left it for the new Relief Road,

will be degraded. The countryside gap between the LVGV development and the Green Route and Arborfield Cross will be degraded as will Church Lane. There is no suggestion that the proposals will be exceptional in terms of their layout or design, in fact the opportunistic and piecemeal approach to these proposals suggests the opposite is more likely.

CHANGE EQUALS DAMAGE, A BRIEF DISCUSSION

- 7.12 The appellants Landscape Architect, Ms Brockhurst states at paragraph 1.40 of her proof of evidence that:

As a matter of professional judgement, I do not take the stance adopted by some of my professional colleagues that change in and of itself equates to harm, or that simply seeing housing is a negative.

- 7.13 I can agree that, of course change in and of itself does not equate to harm. That is why we can admire listed buildings and Registered Historic Parks and Gardens, great country houses, and new buildings in our towns and villages. That is why we have design awards where development can be, and is, celebrated.

- 7.14 In addition, there are examples in the NPPF where development can enhance landscape including Paragraph 84 which deals with isolated dwellings in the countryside and 193(d) which deals with development whose primary objective is to conserve or enhance biodiversity.

- 7.15 In her paragraph 1.41 Ms Brockhurst states:

I consider that if the new housing complements and respects its context, the change can be neutral, or indeed positive in nature, as the housing becomes part of the characteristic townscape that it is intended to be.

7.16 But here there is no 'characteristic townscape' the site is open fields in the countryside.

7.17 In her paragraph 1.42 Ms Brockhurst states:

I note that GLVIA 3 does not contain the word 'harm'.

7.18 This is disingenuous and misleading. The GLVIA contains the term 'adverse effects' nineteen times in the main body of the text and four times in the index under: 'avoidance of adverse effects 41. 59', 'compensation for adverse effects 43 62-63', 'prevention of adverse effects 41 59' and 'reduction of adverse effects 59-62'.

7.19 In her paragraph 1.42 Ms Brockhurst quotes a small part of GLVIA paragraph 4.26 emphasising that 'well-designed new developments **can make a positive contribution** to the landscape and need not always be hidden or screened' (Ms Brockhurst's emphasis). The whole paragraph comes from the top of a section headed 'Reduction'. The whole paragraph is about the reduction of adverse effects or harm. It states:

If potentially significant adverse effects cannot be prevented or avoided, the strategy should be to reduce those that remain as far as possible. In general, the emphasis should be on modifying scheme design through successive iterations to reduce adverse effects. Sympathetic treatment of external areas can, in some circumstances, help the integration of a new development into the surrounding landscape, but measures that are simply added on to a scheme as 'cosmetic' landscape works, such as screen planting designed to reduce the negative effects of an otherwise fixed scheme design, are the least desirable. It should also be remembered that well-designed new development can make a positive contribution to the landscape and need not always be hidden or screened.

- 7.20 It is true that the scheme is being modified through successive iterations, indeed these iterations are proliferating after the appeal was made, notably the drainage scheme, the highways works to Reading Road, a new bridge for the main access, attenuation ponds raised significantly above ground level, etc. But far from reducing adverse landscape impacts these iterations are increasing the harm.
- 7.21 Ms Brockhurst's quote is not only enhanced by her to make her case but it is taken out of context, and the sense of the paragraph is reversed.
- 7.22 I agree. It is true that change does not always equal harm but in this case it does.

UNASSESSED IMPACTS

- 7.23 The Council considers that the following viewpoints of the proposed works (as identified in the Council's correspondence sent on 21st, 28th and 29th January 2026) are pertinent to the appeal:
- the impacts of proposed highways works,
 - the main access and the views into the site at this point,
 - the wider impacts of the main access looking up and looking down Reading Road (including the additional proposed tree removal),
 - the locations of pedestrian access point/s onto Reading Road and the views into the site at this/these points,
 - the locations of pedestrian access point onto Church Lane and the views into the site at this point,
 - views into the site from the western part of Reading Road across the thinner hedgerows to the west of the proposed new vehicular access,

7.24 In addition, and apparently because the appellant's proposals on the following matters are not sufficiently evolved the appellant has not addressed the following impacts and effects:

- the impacts of the bunding now required for the attenuation lakes at the western end of the housing
- the impacts of the bridge now required by the Environment agency for the main road access.
- the impacts of any ground raising required to implement access roads at suitable gradients – particularly at the site access
- the impacts of any ground raising required to allow proposed new housing sufficiently above the high water-table

7.25 The main access is situated almost opposite Walden Avenue. It is between two bus stops. It is therefore in an area of relatively high visibility. And yet no photomontage is provided of the effects of the development on that view. The width of the highway splay means that the hard works will occupy a length of 27m of Reading Road. The maintenance of visibility splays will add further emphasis to the suburban form in this countryside location.

7.26 It is currently understood that a clear span bridge will be required at the main vehicular access and this is likely to increase the impacts and effects introducing, as it does, another urbanising element into the landscape. No photomontage has yet been provided of this.

7.27 In addition, there is a significant failure to examine viewpoints and produce visualisations of views into the site during the winter months when screening vegetation is sparse and at night when lighting will highlight the development in the landscape.

- 7.28 No photomontages have yet been provided to show the landscape impacts and effects of the engineering works, including lighting, to Reading Road. The appellants assessments of landscape impacts have not yet addressed the likely impacts of the required highways works extending from the new Walden Avenue bus top to the roundabout at Arborfield Cross. This is important because of the lighting required and because of the topography which makes it likely that the lume and the glare of the 6m lighting columns will be visible from public rights of way: footpath ARBO16 and Byway Open to All Traffic (BOAT) ARBO19.
- 7.29 Although this is an outline application the realignment of the indicative plans to account for ancient of veteran tree Buffer Zone /RPAs will necessitate moving the areas proposed for housing into more prominent more visual locations. The appellants assessments of landscape impacts and effects have not yet addressed this.
- 7.30 The assessments do not address the impacts and effects of the proposals on those using the Leopard 3 bus route from Reading to Wokingham which runs along Reading Road, stopping at a bus stop at the western end of the site near the Church Lane junction and further east, at the bus stop obliquely opposite the Walden Avenue junction. See map below (the site is just above the right-hand figure '3' in a black circle)

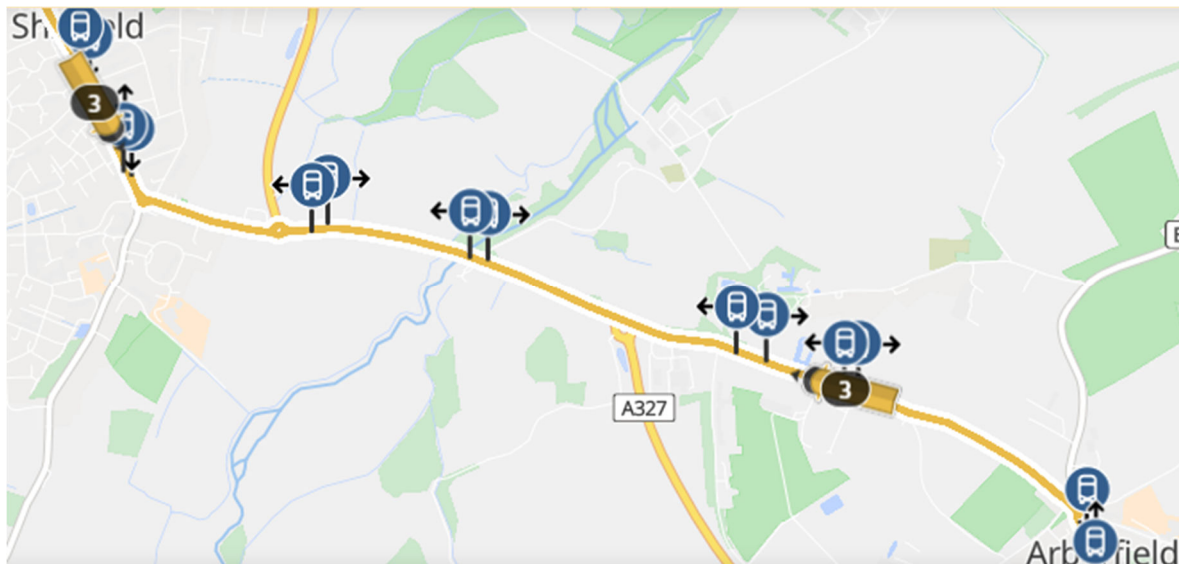


FIGURE 9 ROUTE OF THE LEOPARD 3 BUS FROM READING TO WOKINGHAM

7.31 Passing the 'Arborfield Church Lane' and 'Walden Avenue' stops 49 times a day on the route from Reading to Wokingham, the Leopard 3 runs from 06:01 in the morning to 23:29 at night. On the 'up line' so to speak, from Wokingham to Reading, the Leopard 3 stops at the same two locations, 49 times from 5:52 in the morning to 23:31 at night. The impacts and effects on this element of receptors have not been addressed in the appellants landscape and visual impact assessments.

7.32 These are significant omissions and, in consequence, the LVIA significantly underplays the landscape and visual impacts of the proposals.

IMPACTS AND EFFECTS OF LIGHT POLLUTION

7.33 Common to most proposals for housing development, these proposals will require lighting. The housing lights (including internal and external lighting) and the street lighting internal to the site and at the access points (main vehicular access point, emergency access, and possibly the pedestrian

access points and new bus shelter as well). Such lighting impact on the levels of light pollution in the landscape.

7.34 The impacts are spread out across the site, unless the informal recreation area to the west of the site is unlit (and this is not currently clear in the proposals).

7.35 But because of the requirements for highways improvements to accommodate the traffic that would be generated by the scheme, the effects of light pollution will be felt across a much broader part of the landscape.

7.36 Because of the topography, I consider that the lume from proposed new street lighting along Reading Road will be visible from footpath ARBO16 and Byway open to All traffic ARB019. The lighting columns themselves will likely be visible by day from ARBO19 because the northern hedge flanking Reading Road is currently so tall (although this cannot be relied on as hedgerows are cut from time to time). Nonetheless lighting will have a negative impact on the countryside.

7.37 In addition, inspection of the CPRE tranquillity mapping demonstrates what can still be experienced on site as one travels along Reading Road, that this site sits in an important dark skies hot spot between Arborfield Cross and Shinfield,

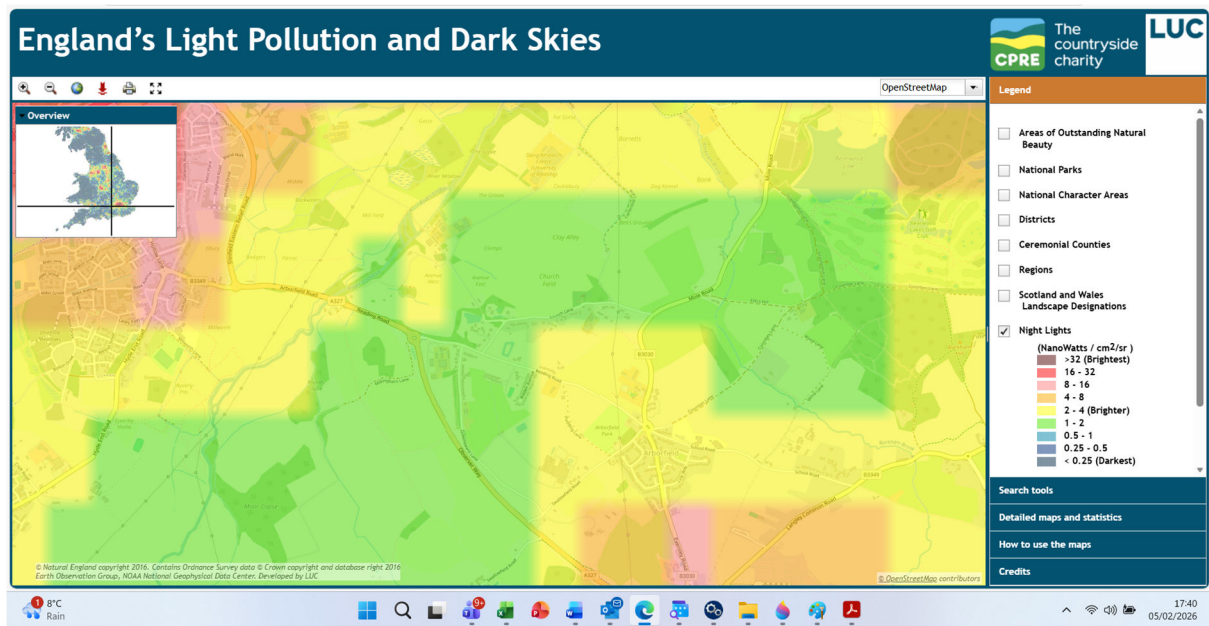


FIGURE 10 CPRE LIGHT POLLUTION AND DARK SKIES MAPPING OF THE AREA

7.38 A close up is shown below.

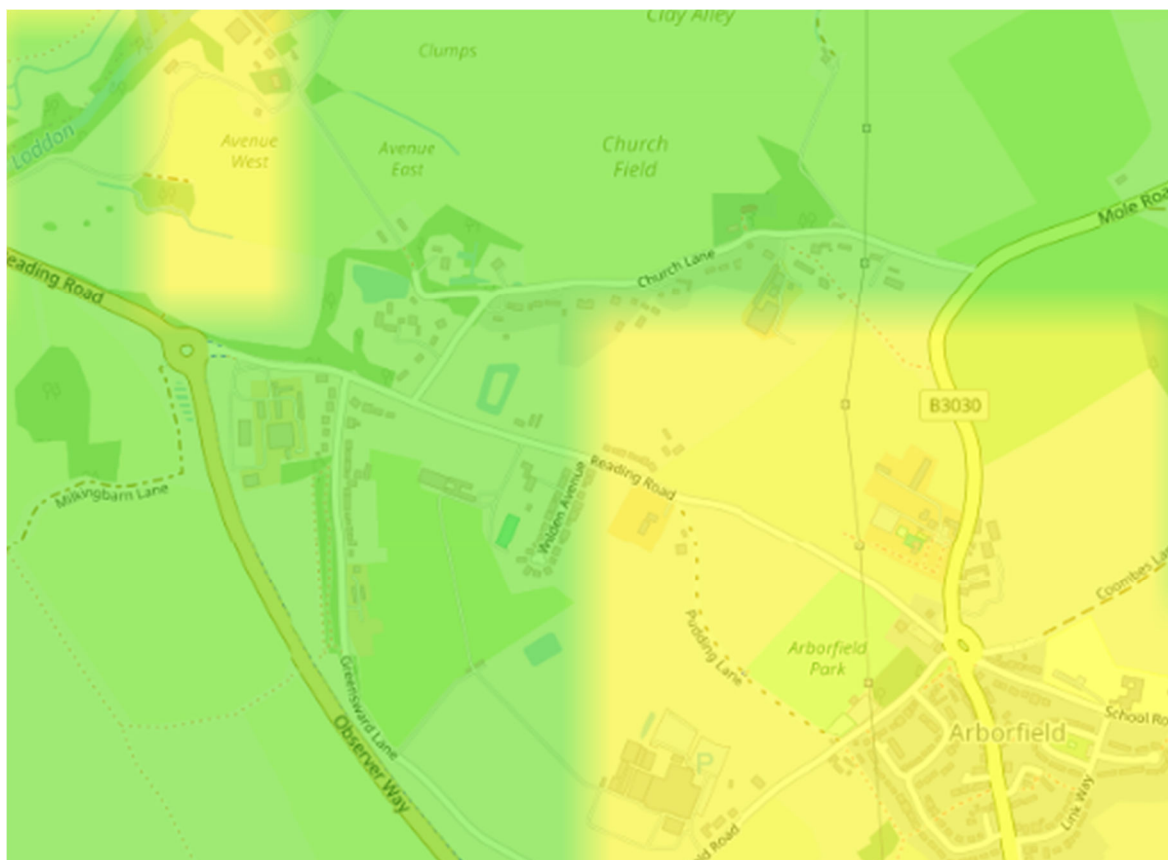


FIGURE 11 CPRE DARK SKIES MAPPING (SITE IS CENTRE)

- 7.39 Importantly Observer Way, the new relief road for Arborfield Cross which can be seen to the SW of the site, only has street lighting at the roundabouts because of the sensitivity of the landscape and because of bats.
- 7.40 Also, I consider that the Reading Road, between the roundabout at Arborfield Cross and the roundabout where it is joined by the new Arborfield Relief Road, Observer Way, presents as a country lane. It feels much darker and more rural along that length than even the CPRE map shows. This is because of the way the CPRE map was surveyed and presented in a tiled format.
- 7.41 Proposed street lighting for the Reading Road, as well as lighting for the site entrance and the housing areas will impact on this and have the effect of closing the night sky hotspot and coalescing the site with Arborfield Cross. The effect will be an urbanising of the landscape. Even if street lights on Reading Road and within the site, and light from new houses could be effectively limited there would still be the perceived need for security lighting and light pollution from cars accessing and egressing the site.

IMPACTS AND EFFECTS OF DRAINAGE AND FLOOD MITIGATION

- 7.42 My understanding of the attenuation basins is that, in a worst-case scenario, and taking ground level at 48.7m above ordnance datum, then the crest of the bunding [containing what essentially turns out to be an above ground basin], would need to be at a minimum height of 50.175m! So 1.475 m above ground level.
- 7.43 We can get an idea of the linear extent of the bunding by looking at the proposed plans, but I note that the Council's drainage officer has said that

‘the stated storage requirement of 2200cum is likely to be a significant underestimate of the actual storage required when the modelling is re-run using an acceptable rainfall model and other input data’.

SIZE OF THE BUNDING (BANKS) SURROUNDING THE ATTENUATION BASIN

- 7.44 The banks themselves will be large. My experience of such structures when I worked at the National Rivers Authority / Environment Agency tells me will be likely to be a clay core, perhaps at least a metre wide, with flanking battered banks at 1:3 gradient either side.
- 7.45 Also, engineers will not want tree or shrub planting on the bunding because of roots growing and dying back providing routes for water egress and also cover for burrowing animals which in their turn may excavate through the bank providing further routes for water egress. I see that, currently, trees (for landscape or biodiversity enhancement?) are shown in the location of the banks or berms in the indicative layout but, for the reasons above, these planting locations are unrealistic.
- 7.46 Looking at the Indicative masterplan briefly I estimate a linear equivalent for the bund being about 330 linear metres (a rough measurement shows 150m and 180m round the northern and southern attenuation basins).
- 7.47 In addition, it seems from paragraph 5.14 of the Sam Watson Ecology report that there will be loss of habitat that will harm bat populations. There seems to be an option to rely on the ‘proposed SuDS basin, if designed to retain standing water’ to ‘compensate for some of this impact’. If the attenuation pond is to be designed to retain standing water then the banks will need to be higher, much higher if standing water is not to quickly turn into a reed bed (an additional depth of water of over one metre will be required to prevent

reed bed turning to swamp), and the landscape visual impacts of this unnatural structure will be huge because, for every metre rise in height of the bunding there will be 6m increase in width of the bunds and an inflated rise in volume (doubling of linear dimensions having a 2^2 impact on cross sectional area and a two cubed [2^3] effect on soil volume to construct new bunds).

- 7.48 But even if a different solution is proposed to compensate for the impacts on bat habitat, there will be significant landscape impacts from the banks that retain the attenuation basin.

BULK EARTHWORKS A ROUGH CALCULATION

- 7.49 Therefore I calculate that each linear metre of bund will require $0.5(4.5 \times 1.5) \times 2 + (1 \times 1.5) \times 1$ cubic metres of soil (when compacted). Adding a bulking up factor of 1.15 (the factor used by the Council in an appeal mentioned below), there would be 15% percent more volume of uncompacted material to be brought onto the site. That sum gives 8.25 cubic metres of soil and clay for every linear metre of attenuation basin retaining bund. This would be quite a large construction and does not seem very sustainable. Given that there will be roughly 330 linear metres of bunding the bulk earthworks, (with a bulking up factor – as mentioned in the Sonning Golf Club appeal (CD10.16) - of 1.15) would be $8.25 \times 330 \times 1.15 = 3,130.875$ cubic metres.

- 7.50 Comparing this figure to the Sonning Golf Course appeal (see below for detail), and as discussed in the Inspector's decision:

- 7.51 'The Council estimated a 'bulking factor' of 1.15 due to the underlying clay; with this multiplier, equating to 5,256 m³. As a result, and assuming a

standard 12m³ tipper truck, it estimated some 937 two-way trips would be necessary from the excavation alone’.

- 7.52 Of course, as the appellant’s thinking on this scheme develops they will see how waterlogged the site is at the bottom (western) side of the housing area and we may yet see them proposing bunding to raise the level of houses sufficiently above the water table. But in any case, the quantities of spoil to be moved about are comparable (see note below on impacts on the countryside).

SONNING GOLF CLUB CARE HOME APPEAL

- 7.53 There was a recent decision in the borough, involving Sonning Golf Club, a scheme for a Specialist Dementia Residential Care Home with an excavated basement (APP/X0360/W/22/3313232 and PA 214173) (CD10.16).

Addressing the construction of the major earthworks proposed on site, the Inspector stated:

38. From what I have seen the information as to the proposed basement excavation has been provided in a piecemeal fashion, and also rather late in the process. Certainly, it appears that the implications of this aspect of the development was given little consideration at the application stage. I would have expected that this should have been an integral part of what should have been a design led project from the outset. Instead, due to the absence of what should have been an Excavated Materials Assessment setting out a firm methodology, it has given rise to the current situation where figures and processes put forward are still sources of considerable contention between the parties. It is clear that any negotiation on the various factors involved has been minimal, if at all. Indeed, from the lengthy evidence given by both sides

at the Hearing on this issue, even if I was minded to allow the appeal the matter of excavation could not be realistically left to the discharge of a necessary planning condition. It is too integral to the scheme for such an approach, and there being so much uncertainty and dispute.

- 7.54 Although, based on the illustrative masterplans provided, it appears that the current Reading Road scheme involves importation rather than exportation of spoil there seem to be similarities with the Sonning Golf Club appeal with regard to the impacts on the sustainability of the scheme and, importantly for this proof of evidence, the visual, noise and disturbance impacts on the countryside from: the building of the attenuation pond bunding; and the haulage of this significant amount of spoil on the road network.
- 7.55 Using my calculations on earthworks above, assuming the use of 12 tonne lorries will be possible, and multiplying by a factor of two to allow for return trips of empty lorries; I calculate $(3,131 / 12) \times 2 = 522$ lorry trips will be required to import this material. If local bridges and other restrictions do not allow the use of 12 tonne lorries then 7.5 tonne lorries will be required. If that is the case then the calculation gives $(3.131/7.5) \times 2 = 835$ lorry trips. These lorry trips will have considerable effects on the countryside, the landscape and townscapes during the construction phase.
- 7.56 So then in summary, the landscape impacts of the drainage and flood mitigation scheme required for this development will be significant. The scheme will not be, as they appear on the masterplan a couple of aesthetic lakes dipping away from ground level with high amenity benefit but two large engineered structures, with significant visual. For engineering reasons there can be no planting on them to soften the impacts and there is little space around them for planting either.

LOW-LYING LAND WITH A HIGH-WATER TABLE AND THE IMPACTS ON LVIA

7.57 Having visited the site on two occasions it does appear to me that the lower lying parts can be characterised as being water-logged. The site seems to be as wet at the site at Land West of Haines Drive Spencer's Wood. That application was, like this one, an outline application, there were drainage issues and a very high water-table. As the appeal evolved new information came forward requiring drainage works and even the use of plinths or platforms to raise houses above the high-water table. This appeal does not appear to have evolved that far yet, but it may be important to consider the landscape and visual impacts of such measures on the landscape and visual impacts and effects should such measures be required on this site.

IMPACTS/EFFECTS ON THE GREEN ROUTE

7.58 As well as the landscape and visual impacts of the housing, drainage structures, tree loss, various access points (main vehicular access point, emergency access, pedestrian access) and new bus shelter, the proposals include additional works to the stretch of Reading Road between the bus shelter opposite the entrance to Walden Road and the roundabout at Arborfield Cross. In addition, I understand that a pedestrian crossing traversing Reading Road is now proposed by the existing drop kerbs at the Bull Inn and further drop kerb crossing points will be installed crossing Walden Avenue and also Reading Road at the junction of these two roads. Furthermore, a Bus Boarder with kerb buildout and accessible kerbs proposed for the Walden Avenue stop, whilst important for disabled bus

users, will have a negative impact on the Green Route and the local environment. See figure below.

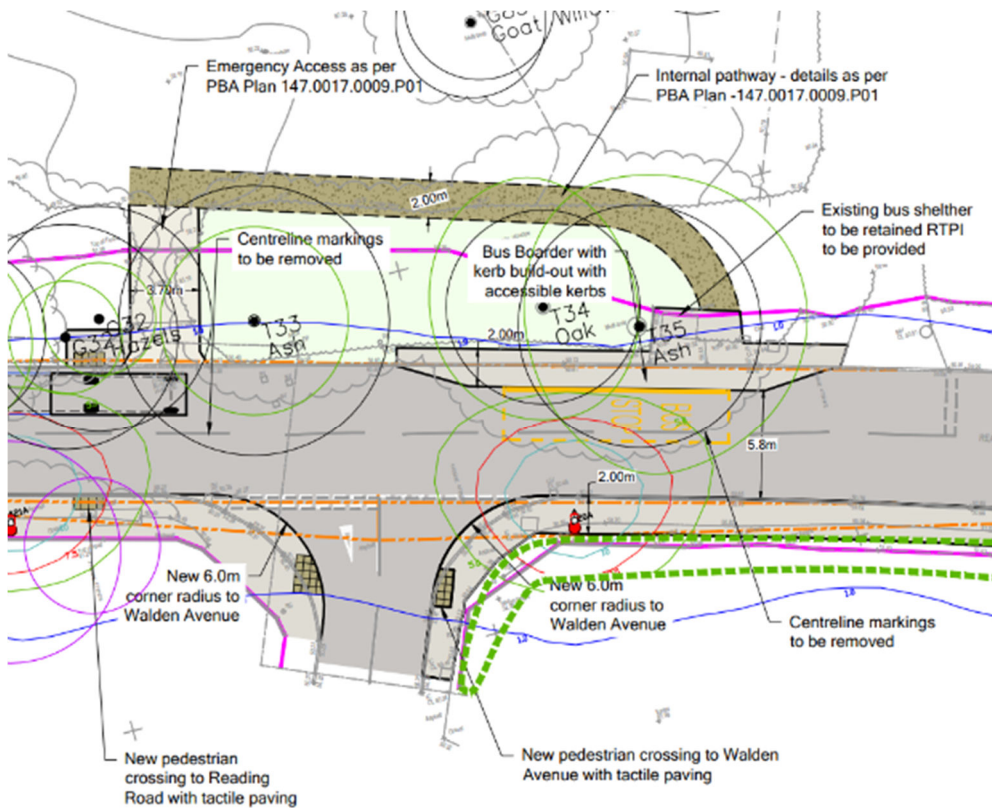


FIGURE 12 PROPOSED NEW WALDEN AVENUE BUS STOP

- 7.59 These works will have a significant and negative cumulative urbanising impact on the Green Route from the site to Arborfield Cross.
- 7.60 It is true that during the day the impacts of the proposed new road works in the section of Reading Road to the E will be, in the main, contained. But 6m lighting columns at regular intervals will be intrusive and urbanising especially when taken with the cumulative impacts of the pavement upgrading. Of course, during the night the lighting will a 'flare path' or miniature 'approach lighting system' linking Arborfield Cross with the site and effectively urbanising and coalescing the site with the settlement.

- 7.61 The Green Route is currently used by motorists, cyclists and pedestrians as well as passengers on the Leopard 3 buss route from Reading to Wokingham and back. There are two bus stops adjacent to the appeal site: 'Church Lane Arborfield' and Walden Avenue'.
- 7.62 The current Landscape and Visual Impact Assessment underplays the impacts and effects of the proposals on the landscape and underestimates the number and sensitivity of receptors.
- 7.63 Importantly there are various policy requirements for planning affecting a Green Route.
- 7.64 At paragraph 187(b) the NPPF states that: 187. Planning policies and decisions should contribute to and enhance the natural and local environment by: recognising the intrinsic character and beauty of the countryside.
- 7.65 Green Routes are often improved by appropriate tree planting. Even though highways 'improvements' are proposed for Reading Road there are no accompanying landscape improvements. Indeed, even the Buffer Zones drawn by the engineers are those for ordinary trees (capped at 15m). They are inadequate for the veteran trees that flank the Reading Road and do not comply with the requirements of the Standing Advice.
- 7.66 Paragraphs 135 of the NPPF requires that proposals should 'add to the overall quality of the area' and be 'sympathetic to local character' and 'landscape setting'.
- 7.67 One of the 'detractors' of the Green Route is the entrance to Walden Avenue. However, whilst close boarded fencing to 2m height and lack of garden trees flanking the Green Route at this point are clearly negative

attributes, the well-maintained evergreen hedges work well in the context of the entrance to the early to mid 20th century street scene.

- 7.68 The larger, generally well-tended sunny front gardens and wide mown verges of properties to the N of Reading Road add an element of interest although this works precisely because it offers limited more open views rather than being relatively attractive compared with views across agricultural landscapes.
- 7.69 Paragraph 136 of the NPPF encourages street tree planting and the retention of existing trees it states: Planning policies and decisions should ensure that new streets are tree-lined ... and that existing trees are retained wherever possible. Further, it states:
- Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.*
- 7.70 It is perhaps a result of the later submission of highways works proposals without the benefits of the normal routes of consultation that no tree planting has been proposed in mitigation and enhancement of the Green Route along the line of these proposed works. Whatever the reason it is disappointing and perhaps symptomatic that impacts on green infrastructure have not yet been assessed let alone mitigated.
- 7.71 Policy CP1 of the Core Strategy states that 'planning permission will be granted for proposals that (1) Maintain or enhance the high quality of the environment'.

7.72 The MDD Local Plan policy CCO3: Green Infrastructure, Trees and Landscaping addresses Green Routes as defined on the Policies Map (CD 18.12). CC03(2) states that:

CC03 (2) Development proposals should demonstrate how they have considered and achieve the following criteria within scheme proposals:

(a) Provide new or protect and enhance the Borough's Green Infrastructure networks, including the need to mitigate potential impacts of new development

(c) Promote the integration of the scheme with any adjoining public open space or countryside.

(d) Protect and retain existing trees, hedges and other landscape features,

(e) Incorporate high quality, ideally, native planting and landscaping as an integral part of the scheme.

7.73 Policy CC03 is clear that:

3. Development proposals which would result in the loss, fragmentation or isolation of areas of green infrastructure will not be acceptable.

7.74 MDD Local Plan Policy TB21 addresses 'Landscape Character'. It states that:

1. Proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment, Including the landscape quality; landscape strategy; landscape sensitivity and key issues.

2. Proposals shall retain or enhance the condition, character and features that contribute to the landscape.

- 7.75 The essential character of Green Routes varies from town to countryside. In urban areas the Green Routes are less verdant. Whilst some self-seeded mature trees remain from the earlier, more rural past, the Green Routes rely heavily on rows or avenues of newly planted trees and on more formal clipped hedges and views out are often truncated by these features and by the more densely spaced buildings of the borough's towns.
- 7.76 In the countryside and in the villages Green Routes are more verdant, they rely less on formal hedges and newly planted trees. They are more often characterised by self-seeded mature trees and species rich native farm hedgerows in various states of management from close clipped to ragged and time worn. Crucially for the enjoyment and appreciation of the countryside and the local environment Green Routes in the countryside rely on views through their flanking vegetation to the rural landscape beyond.
- 7.77 For this development and for the Reading Road Green Route in particular there will be many impacts, most of them negative. Dealing with the most obvious potentially positive effect first, it is true that a development may bring roadside trees and hedges into better, more sensitive, management. However, whatever is written in any conditioned management plan it is my long experience in Local Government that the implementation and management of landscape works on development sites is only as good as the resources allocated to it by developers and Local Planning Authorities. Even given the assurances of a conditioned management plan, (and given the Government's latest round of cuts for local authority funding) I do not consider that, development will result in more positive tree and hedgerow management on the site in the medium to long term.
- 7.78 The main negative impacts on the Green Route are:

- Views of the housing development, filtered through a hedgerow but more visible in winter months.
- Views of the attenuation ponds and the engineered bunding supporting them
- The impacts of pedestrian access points at the two bus stops 'Church Lane Arborfield' and 'Walden Avenue', including bus stop enhancements at the latter.
- The impacts of the main vehicular access including views of the access itself and the way it will open up the site to views-in. A wide mouthed structure of over 20m (including turning splays) with signage, road markings and lighting, the new access will require the removal of T14 a category B2 oak tree and others 'to allow for proposed access'. The access will be significantly urbanising.
- The impacts of the emergency access which, whilst depicted in photomontages as a white field gate, would open views into the site where new housing would be clearly visible.

7.79 These impacts would have a considerably urbanising impact on the natural and local environment, the character of the countryside and, of course, the Green Route.

IMPACTS ON CHURCH LANE

7.80 Whilst no representative photomontages have been provided to demonstrate the summer, winter and nighttime effects of the proposals on Church Lane it is appreciated that, currently, the triangular field at the west end of the site is shown as public open space.

- 7.81 The indicative master plan shows two pedestrian access points from this space onto Church Lane and there will be a viewpoint through to the bunding of the attenuation ponds and the housing beyond from the southern most access point.
- 7.82 The views will be negative and urbanising because of the engineered form of the attenuation ponds. However, they will be medium range views.
- 7.83 There will be a reduction in the quality of views into the site but at the same time there will be access to the public open space which will be positive.
- 7.84 If, however, the pedestrian access points are to be illuminated then this will be negative and urbanising effect that is not supported by policy.
- 7.85 I note that the indicative masterplan is evolving for this site. I understand that the latest version shows only one access from Church Lane.

CHURCH LANE, THE SITE, AND THE RELATIONSHIP WITH THE PROPOSED LODDON VALLEY GARDEN VILLAGE

- 7.86 Church Lane is quiet and rural. The houses there are large and most sit modestly behind leafy front gardens (although recently there has been an increasing trend towards 'smarter' frontages with ornate gates and gate pillars that detract from the lane).
- 7.87 Along the lane are two listed buildings, 'The Old Rectory' and 'St Bartholomew's Church'.
- 7.88 To the north of these larger properties in their leafy lane is planned the Loddon Valley Garden Village (LVGV) a large and modern development with an access off Reading Road and no road access from Church Lane. The

Garden Village will be self-contained and sports fields and landscaping are planned to preserve the integrity and identity of Church Lane.

- 7.89 The site sits to the south and east, cradled behind the long rear gardens in the cruck of Church Lane. If allowed the appealed development would have no relationship with Church Lane (other than backing onto the long gardens of properties there) and would be separated from LVGV by the green corridor of the lane and its large properties.

RELIANCE ON LANDSCAPE SCREENING

- 7.90 As previously discussed the GLVIA, in a section headed 'Reduction' states that:

Sympathetic treatment of external areas can, in some circumstances, help the integration of a new development into the surrounding landscape, but measures that are simply added on to a scheme as 'cosmetic' landscape works, such as screen planting designed to reduce the negative effects of an otherwise fixed scheme design, are the least desirable.

- 7.91 Recent appeals in the borough highlight the difficulty of relying on merely screening a development to make palatable what is unpalatable in planning terms.

- 7.92 The Inspector in the 2021 Barkham Manor Farm appeal stated:

55. Whilst I accept that landscaping measures could be carried out to alleviate any harm I am not convinced that a landscaping scheme, which took into account the local context, would either be effective or not look out of place in the open agricultural setting. In any event the adverse impact upon the landscape character identified above should not be ignored; the argument that

the development could be screened is not a good one in principle; it could be repeated too often to the overall detriment of the local landscape.

- 7.93 CH14.21 In a complementary comment on screening in the Woodlands Farm appeal, the Inspector stated:

59. A revised landscaping plan seeks to enhance the boundary vegetation to provide a visual barrier of direct views of the site from adjacent and nearby residential gardens and intermittent views along School Road and views from Wood Lane. Whilst the proposed landscaping could be secured by the imposition of conditions it would not assimilate the site within the landscape but would aim to hide the site. The purpose of landscaping conditions is to enhance a development and not hide an unacceptable visual intrusion. It is not reasonable to impose maintenance conditions for landscaping in perpetuity and therefore reliance on landscaping to hide an unacceptable form of development is also not reasonable.

- 7.94 These two paragraphs are complementary and, I submit, have broad applicability to planning in general.