



PLANNING OBJECTION STATEMENT

Wokingham Borough Council Planning Application (ref. 251421) for:

*Full application for erection of 53 no. dwellings with associated landscaping, parking, drainage, open space and other associated works at Land At Old Forest Road
Wokingham*



Author	Mr Alexander Needs BA (Hons) MICFor (Chartered) RCarborA MArborA
Report Ref:	260105-1.0-TH-AS
Date:	5 January 2026
Tel:	01252 280256
Email:	alex@holtarb.co.uk
Web:	www.holtarb.co.uk

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1 Statement of qualifications and experience

1.1 The author

- 1.1.1 Alex Needs is a Chartered Arboriculturist (www.icf.org.uk) and Registered Consultant with the Arboricultural Association (www.trees.org.uk). He holds the Cardiff University Bond Solon Civil and Criminal Expert Witness Certificates and is an Accredited Mediator. He has a degree in Linguistics and holds both the Technician's Certificate in Arboriculture and the Royal Forestry Society Certificate in Arboriculture. He is trained to the LANTRA Professional Tree Inspection standard. He has worked in arboriculture for over 20 years and since 2007 has held senior arboricultural roles in both public and private sectors. Alex is also a trustee at the Fund4Trees charity (fund4trees.org.uk).
- 1.1.2 Alex started his arboricultural career working as a climbing arborist for tree surgery companies throughout Surrey. This soon led him to an arborist role with the National Trust at Winkworth Arboretum where he was actively involved in the management of rare and internationally significant trees.
- 1.1.3 Alex went on to take the position of Assistant Tree Officer with Waverley Borough Council where he guided the public, colleagues, and elected members on the legislation surrounding trees. Following this he took up the position of Senior Tree Officer at Elmbridge Borough Council, a role he occupied for nearly a decade. In this role he managed both the statutory obligations of the local planning authority and the liability of the Council for its own trees within public spaces. It was during his time at Elmbridge that he achieved Chartered status with the Institute of Chartered Foresters.
- 1.1.4 Following a successful career as a Tree Officer Alex was recruited into the private sector, initially at Barrell Tree Consultancy and later with Treework Environmental Practice. Both highly respected consultancies in the fields of planning, tree safety, and ancient/veteran tree management.
- 1.1.5 In 2017 Alex achieved Registered Consultant status with the Arboricultural Association, a recognition by his peers that he was acting at the pinnacle of the profession.
- 1.1.6 In 2024 Alex was acknowledged by the National Tree Safety Group for his contribution to the respected industry publication, *Common sense risk management of trees - Guidance on trees and public safety in the UK for owners, managers and advisers*.

2 Terms of Reference

2.1 Instruction

2.1.1 Holt Arboriculture Limited has been instructed by Mrs Natasha Sawdon of Toutley Hall North, to consider the proposals for a residential development of 53 dwellings (Application Ref: 251421), to visit site, and to prepare a statement for submission by Mrs Sawdon to the Local Planning Authority (LPA).

2.1.2 Our instruction is limited to considering the impact of the proposal on the trees located close to the proposed access from Old Forest Road.

2.2 Site Visit

2.2.1 Mr Alex Needs visited site on 17 December 2026 and reviewed the scheme and the existing trees. Access was limited to the drive running from Old Forest Road to Oaklea Cottage.

2.3 Application

2.3.1 The full application was received by the LPA on 13 June 2025 and validated on 20 June 2025. Whilst it is noted that the consultation period ended on 06 September 2025, I understand from Mrs Sawdon that the Council is still willing to accept comments. The expiration date for the application is given as 13 February 2026.

2.4 Relevant local policies

2.4.1 *Policy CP1 (Sustainable Development)*: Requires that development maintains or enhances the high quality of the environment and provides attractive, functional, safe, and adaptable schemes.

2.4.2 *Policy CP3 (General Principles for Development)*: Mandates that proposals are of an appropriate scale, layout, and character to the area without detriment to the amenities of adjoining land users. It requires that development has no detrimental impact on important ecological or landscape features.

2.4.3 *Policy CC03 (Green Infrastructure, Trees and Landscaping)*: Requires the protection and retention of existing trees, hedges, and other landscape features.

2.4.4 *Policy NE4 (Trees, Woodland, Hedges and Hedgerows)*: As an emerging policy, it requires the protection and incorporation of existing trees and hedges into the public realm. It mandates an assessment of the health of all affected trees and requires that mitigation measures for any loss provide "equivalent scale, canopy cover, habitat connectivity and character".

2.4.5 *Policy TB21 (Landscape Character)*: Requires that proposals address the Council's Landscape Character Assessment (LCA) and retain or enhance the features that contribute to the landscape.

2.5 National Planning Policy Framework (NPPF)

2.5.1 *Paragraph 136*: Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to

incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. 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.

2.6 British Standard 5837:2012

- 2.6.1 BS 5837:2012- Trees in relation to design, demolition and construction – Recommendations, provides a comprehensive framework of recommendations aimed at achieving a harmonious and sustainable relationship between trees and the processes of design, demolition, and construction. It guides professionals through a structured sequence that starts with detailed topographical, soil, and tree surveys to identify constraints and categorize the existing tree stock based on its quality and long-term value. A central component of this standard is the calculation and safeguarding of the Root Protection Area (RPA), which is the minimum area around a tree deemed necessary to maintain its viability. To manage potential conflicts such as the installation of permanent hard surfacing, the document outlines the necessity of arboricultural impact assessments, tree protection plans, and specific method statements to ensure trees are not irreparably damaged during development. Ultimately, the standard emphasizes the importance of retained trees to provide essential benefits, such as visual amenity and climate change adaptation, for years to come.

3 Report purpose and summary

- 3.1.1 The purpose of the objection report is to provide a formal, technical challenge to the proposed development. As an expert document submitted to the LPA its primary objectives include:
- 3.1.2 *Identifying Technical Inaccuracies:* The report highlights significant failures in the applicant's baseline data, such as the omission of several trees. This prevents the Council from making a fully informed assessment of the scheme's impact on the local tree population.
- 3.1.3 *Demonstrating Failure of 'Proof of Concept':* The report argues that the applicant's single cross-section fails to account for the complex topography and slopes near retained trees. It challenges the feasibility of "no-dig" construction in these areas, suggesting the design may lead to significant root disturbance.
- 3.1.4 *Protecting High-Value and TPO Trees:* A core purpose is to prevent the loss of prominent, protected trees like T22 (Robinia) and T37 (Ash), which are highly visible from the road and vital to the landscape character. It also critiques the detrimental proximity of the new road to Category A Oaks T18 and T20, noting that such designs often lead to future pressure for tree removal due to infrastructure damage.
- 3.1.5 *Highlighting Policy Conflicts:* The report demonstrates how the proposal violates specific local and national policies, including WBC Policies CP1, CP3, CC03, NE4, TB21 and NPPF Paragraph 136 and is contrary to the British Standard 5837:2012 – Trees in relation to design, demolition, and construction.
- 3.1.6 *Addressing Local Environmental Goals:* It points out that the current canopy cover of 25% is below the 30% goal for the area, arguing that the site cannot afford the loss of mature canopy, which cannot be replaced by the small ornamental trees proposed by the developer.
- 3.1.7 *Challenging Infrastructure Feasibility:* The report questions whether the proposed geocell "no-dig" road would ever be adoptable by the Council, potentially leaving future residents with an unmaintained private road contrary to the "adoptable-standard" suggestions in the applicant's DAS.
- 3.1.8 In essence, the report functions as a material consideration for the Planning Department, providing an evidence-based rationale to refuse the application on the grounds that it is unsustainable and arboriculturally damaging.

4 Objection details

4.1 Inaccuracy of Tree Data and Baseline Omissions

4.1.1 The tree survey underpinning this application is fundamentally flawed due to the omission of several trees directly adjacent to the proposed access route. A site inspection on 17th December 2025 identified missing specimens that would be influenced by the development, including:

- A young acacia growing directly adjacent to T19.
- A young beech tree next to the stable block within the boundary of "The Stables".
- A young oak tree growing just within the boundary of Oaklea Cottage.

4.1.2 BS 5837:2012 (Section 4.4.2.1) requires the survey to include all trees on or adjacent to a site that could influence the development, including off-site trees. Without an accurate baseline, the LPA cannot fully assess the cumulative impact on the local tree population or the specific constraints these omitted trees pose to the proposed infrastructure.

4.1.3 *Contradicts Policy NE4:* Policy NE4 requires a comprehensive assessment of the health and value of all trees affected to understand the cumulative impact on the local population.

4.2 Inadequate Topographical Data for 'No-Dig' Feasibility

4.2.1 The applicant relies on a single, isolated cross-section (plan ref. 7365.010, Section A-A, Stuart Michael Associates) to demonstrate the feasibility of the access route. BS 5837:2012 (Section 5.4.2) explicitly states that scaled cross-sections should be provided to demonstrate the feasibility of proposals near trees. My site visits confirmed the topography is more complex than represented in a single cross-section. The track has varying levels and gradients in different plains. The cross section is located between both retained trees (T18 and T20) and shows no detail relating to the exact topography next to either of them.

4.2.2 Imposing a cellular confinement system (geocell) over this uneven terrain without assessing the immediate rooting areas around these trees risks significant root disturbance at construction stage. The applicant has therefore failed to provide a technical 'proof of concept' that no-dig construction can work here.

4.2.3 *Contradicts Policies CP3 & NE4:* Policies CP3 and NE4 require designs that respond to topography and provide sufficient space for trees to thrive.

4.3 Proximity of Hard Surfacing to Category A Trees (T18 and T20)

4.3.1 The proposed access road and pavement are positioned in immediate proximity to high-quality Category A oaks T18 and T20 (plan ref. 092404-ELS-02, supporting planning layout, DHA Architecture). In particular T18 appears to directly abut the footpath.

4.3.2 Mature oak trees exert significant pressures from growth, that will inevitably distort the road and footway. The risk of direct damage is consistently highest close to the tree, particularly from the incremental growth of the main stem and root buttresses. Most severe pavement damage typically occurs within a 2-metre radius of the trunk. This creates future pressure

for the removal of these high-quality trees due to trip hazards and ongoing cost of repair to the infrastructure.

- 4.3.3 BS 5837:2012 (section 7.4.2.7) states that any new hard surfacing should be set back from the stem of the tree and its above-ground root buttressing by a minimum of 500 mm to allow for growth and movement. It is not clear that this is achievable in this instance.
- 4.3.4 BS 5837:2012 (Annex A.1.2) further warns that the risk of direct damage (lifting or displacement) is highest close to the tree. Table A.1 recommends a minimum distance of 1.5m for new trees with a stem diameter over 600mm to avoid damage to in situ concrete paths and drives.
- 4.3.5 *Contradicts Policies CP3, CC03 & NE4:* Placing hard surfaces close to mature trees causes ongoing conflict leading to future pressure for tree removal. This violates the requirement to protect and retain significant trees and landscape/ecological features under CP3 and CC03 and ensure they have space to grow under NE4.

4.4 Non-Adoptability and Policy Conflict

- 4.4.1 The Design and Access Statement suggests the streets will be "adoptable-standard". However, Section 3.4.2 of WBC's 'Living Streets' Guide states the Council "will usually seek the adoption of new residential streets serving more than five dwellings". With 53 dwellings proposed, this road is required to be adoptable.
- 4.4.2 WBC policy explicitly states they may decline adoption where non-standard "no-dig" geocell construction or tanked storage/SuDS are used below the surface. This forces the road to remain private, requiring a Management Company and a Section 106 agreement. This places an unfair long-term financial burden on residents for repairs that standard Council maintenance will not cover.
- 4.4.3 *Contradicts CP1:* WBC policy (Living Streets Guide) states the Council seeks to adopt roads serving more than five dwellings. However, the proposed non-standard geocell "no-dig" construction is unlikely to be adopted, potentially leaving residents with a private road and high maintenance liabilities. This contradicts Policy CP1, which requires schemes to be "adaptable" and "safe" for the long term.

4.5 Removal of Protected and Prominent Trees (T22 and T37)

- 4.5.1 The scheme proposes felling T19, T22, T36, and T37 to enable road access. T22 (robinia) and T37 (ash) are Category B trees and are highly visible from Old Forest Road, acting as prominent landscape features. Their value is recognised by protection under Tree Preservation Order.
- 4.5.2 Regarding T37 (ash), the Woodland Trust recommends that even in the face of Ash Dieback, as many potentially tolerant ash trees as possible should be retained to support species recovery. Neither the submitted tree surveys nor my site visit identified any significant health issues with this tree. Felling a healthy specimen prematurely undermines species conservation goals and local policy regarding biodiversity retention.

- 4.5.3 *Contradicts CC03, NE4 & TB21:* The scheme requires felling trees recognised as having value to the wider public landscape. Their removal is significantly detrimental to the local landscape, violating TB21 (retaining features that contribute to the landscape) and NE4, as the proposed replacement with 33 small trees does not provide equivalent scale or character to the mature canopy lost.

4.6 Deficit in Tree Equity and Canopy Cover

- 4.6.1 According to the Tree Equity Score UK, this area (LSOA E01016700) has a current canopy cover of 25%, falling short of the 30% target. This 5% deficit means there is no margin for the loss of mature, high-quality trees.
- 4.6.2 The developer proposes replacing mature, TPO protected trees with 33 small trees (as described in the BNG reports by AA Environmental Limited). This fails to meet the requirements of Emerging Local Plan Policy NE4, which stipulates that mitigation must provide "equivalent scale, canopy cover, and character". Small ornamental trees cannot replicate the ecological and urban cooling benefits provided by the mature canopy of the trees scheduled for felling.
- 4.6.3 *Contradicts CP1 & NE4:* Policy CP1 and NE4 require developments to maintain or enhance environmental quality; replacing mature "Landscape Character" trees with ornamental species fails to replicate the ecological and cooling benefits of the existing mature tree stock.

5 Conclusions

- 5.1.1 In summary, this application is supported by demonstrably inaccurate baseline data, fails to prove the engineering feasibility of its primary infrastructure, and proposes a design that is fundamentally incompatible with the long-term survival of high-value, protected trees. As a Chartered Arboricultural Consultant, it is my professional opinion that the scheme does not accord with the National Planning Policy Framework (NPPF) and Wokingham Borough Council's most critical environmental policies. The following points necessitate the refusal of this application:
- 5.1.2 The omission of multiple trees from the survey means the Council cannot accurately assess the cumulative impact of the development on the local tree population. This renders the submitted Arboricultural Implications Assessment (AIA) a flawed document that fails the assessment requirements of emerging Policy NE4.
- 5.1.3 The applicant's reliance on a single, isolated cross-section fails to account for the complex site topography where key trees are situated. There is no "proof of concept" that a geocell "no-dig" system can be safely implemented on these slopes without causing significant root disturbance.
- 5.1.4 Positioning the access road and pavement within 300mm of the trunks of Category A oaks (T18 and T20) is contrary to the recommendations of BS 5837:2012. The inevitable incremental growth of trunks and roots will cause ongoing damage to built surfaces, leading to "trip and slip" hazards and future legal pressure to fell these high-quality trees in conflict with NPPF Paragraph 136.
- 5.1.5 While the council seeks to adopt roads serving more than five dwellings, it may decline adoption for non-standard "no-dig" geocell construction. This creates an unsustainable management liability for future residents, contradicting Policy CP1, which requires schemes to be functional and adaptable.
- 5.1.6 The removal of prominent, TPO protected trees like T22 (robinia) and T37 (ash) which are highly visible from Old Forest Road, will permanently degrade the local landscape character in contradiction of policies CC03 & TB21. Furthermore, felling a healthy ash (T37) ignores Woodland Trust recommendations to retain tolerant individuals for species recovery.
- 5.1.7 With a current canopy cover of only 25% against a 30% target, the local area cannot afford the loss of mature, ecosystem-serving trees. Replacing the old mature trees on the site with 33 small trees does not provide the "equivalent scale and character" mandated by Policy NE4.
- 5.1.8 In my opinion The "tilted balance" of the NPPF cannot be applied in favour of a scheme where the adverse environmental impacts so significantly and demonstrably outweigh the benefits. We strongly urge the Council to protect the borough's natural capital and refuse this application.

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