

**Arboricultural Proof of Evidence
for the Residential Development
at
Land North of Reading Road,
Arborfield.**

Prepared for Dandara Southern Limited and Elstree Land.

**PINS Ref: APP/X0360/W/25/3371069
LPA Ref: 243099**

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Our Ref 1025-100810
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1.0 Introduction

- 1.1 This Arboricultural Proof of Evidence has been prepared by Peter Wilkins of Ruskins Tree Consultancy to comment on the tree issues associated with the appeal against the decision of Wokingham Borough Council to refuse outline planning permission for up to 111 dwellings with associated works, parking, landscaping, publicly accessible open space, with access from Reading Road (All matters reserved save for means of access). LPA Ref: 243099.
- 1.2 I am the managing director of Ruskins Tree Consultancy (a trading name of RG Consultancy Limited) an arboricultural consultancy that has been trading since 2001. I have a wide range of experience within the tree consultancy sector specialising in trees in relation to planning and development. I am a professional member of the Arboricultural Association, a Member of the Institute of Environmental Science and a Chartered Environmentalist.
- 1.3 I am member of the British Standards Institute 213 Trees Committee who are responsible for overseeing all tree related British Standards including the BS5837(2012) which is currently being revised. I have a wealth of experience dealing with arboricultural issues on numerous development and planning projects ranging from 4000 unit residential lead, mix-use regeneration projects to single residential dwellings. I have also worked on numerous education, health, care-home/older-living and infrastructure projects throughout the UK.
- 1.4 I have also worked on the Lincolns Inn Great Hall, Refurbishment and Basement project, the Natural History Museum Grounds improvement project and Queen College, Oxford Library Basement Extension. I have been involved in the planning application for the Cabinet Office and Berkeley Homes Ltd for the ongoing redevelopment of Sunningdale Park Estate.
- 1.5 In preparation of this Evidence I have where possible avoided introduction of new references, preferring to use those submitted as part of the Wokingham Borough Council's Core Documents.
- 1.6 I have visited on a number of occasions, first visiting the site in September 2024 and most recently in January 2026 and have reviewed the relevant plans and reports for the purpose of the appeal.
- 1.7 Since the planning application and following receipt of the extended Topographical Survey we have also surveyed the vegetation along Reading Road in relation to the proposed s278 Works. We have added information on these trees in the tree survey information submitted for this inquiry.

- 1.8 I confirm that this statement and other work for this inquiry has been prepared by me, without the use of Artificial Intelligence and that the evidence I have prepared and provided for this Appeal is true and reflects my professional opinion regardless of whom I am instructed by.
- 1.9 I have previously prepared a Proof of Evidence relating to the proposed site access, and briefly commenting on the s278 works along Reading Road.
- 1.10 We have attended a joint site visit with Christopher Hannington the WBC Landscape and Tree Officer and prepared a Statement of Common Ground dated 31st of January 2026.
- 1.11 This Proof of Evidence has been prepared in response to the disputed issues raised in the Arboricultural SoCG that was agreed on 31st of January 2026.
- 1.12 Following the preparation of our first SoCG on 31st January 2026, the appellant has prepared 3 new plans listed below.
1. Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026)
 2. Tree Removals Plan (Drawing Reference 052403-DAN-MP04-TRP 04/02/2026)
 3. Illustrative Land Use Plan (Drawing Reference 052403-DAN-MP04-ILUP 04/02/2026)
- 1.13 These plans have been submitted to PINS with copies sent by email to WBC on 5th February 2026. At the time of writing this PoE, we are exchanging emails regarding revising the SoCG based on the amended plans.

2.0 Arboricultural Matters

- 2.1 The arboricultural impact of the proposed vehicular access and pedestrian / emergency access, both onto Reading Road are not disputed by WBC.
- 2.2 The disputed matters associated with trees are discussed in an email from Joanna Carter WBC dated 16th January 2026 and within the Statement of Common Ground dated 31st of January 2026. The disputed matters on-site relate to 7 retained trees, and how these are addressed and protected within the original Illustrative Masterplan (CD01-06 Drawing Reference 052403-DAN-MP01 Rev – 22/11/2024) and how the proposed development may impact on the condition of the veteran and notable trees.
- 2.3 The arboricultural points of dispute raised by WBC relate to the potential impact of development on the following trees:
- a). oaks T3, T4, T50, the lime T39 located within the open space to the western part of the site.
 - b). oak T56 to the northern boundary.
 - c). oak T72 located within the site.
 - d). the oak T87 off-site to the south-eastern boundary of the site.
- 2.6 For ease of reference we have put the tree designation and TPO status in Table 1 below

Tree No.	Species	Ruskins	WBC	Ancient Tree Inventory	TPO Status
T3	Oak	Mature	Veteran	Notable	Yes
T4	Oak	Veteran	Veteran	Not recorded	Yes
T39	Lime	Veteran	Veteran	Not recorded	Yes
T50	Oak	Veteran	Veteran	Veteran	Yes
T56	Oak	Veteran	Veteran	Not recorded	No
T72	Oak	Veteran	Ancient	Veteran	No
T87	Oak	Mature	Veteran	Notable	No

Table 1

- 2.7 The location of these trees is shown on the Annotated version of the Amended Tree Removals Plan (052403-DAN-MP04-TRP 04/02/2026) showing the location of Veteran and Notable trees. (See Appendix e).
- 2.8 Ancient woodland, ancient trees and veteran trees_ advice for making planning decisions (CD18.06) is known as the Natural England Standing Advice, this document gives guidance on Root Protection Areas for veteran trees which within this report I will refer to as 'NE RPAs'

- 2.9 Please note the Ancient Tree Inventory online mapping has the tags off-set from the tree location on the underlying aerial image, this makes it difficult to determine which two trees from T3, T4 and T50, the tags 'Notable' and 'Veteran' relate to. (See Appendix c).
- 2.10 As a precautionary measure I have treated T3, T4 and T50 as veteran Trees. These trees are located to the southern side of the open space to the western side of the site and are in my opinion unaffected by the proposed development.
- 2.11 The oak T72 is considered by WBC to be an Ancient Tree in my opinion this tree is still in the veteran stage of life as it has not started to undergo crown reorganisation by significantly reduce its' overall canopy size. See Appendix b for more information on this matter. It should be noted that in all relevant planning policy and guidance veteran and ancient trees are treated in the same way, with the same NE RPAs, so any dispute in the T72 categorisation is not considered material to this appeal.
- 2.12 The term veteran includes ancient trees, so within this report I will use the term 'veteran'.
- 2.13 'Notable' is a term used by the ATI for the trees' where the validators do not consider the information and photographs submitted meet the criteria of veteran.
- 2.14 We identified two previously unrecorded veteran trees the lime T39 and and oak T56 during our survey.
- 2.15 All the veteran and notable trees are to be retained with appropriate Root Protection Areas within the proposed development.
- 2.16 With the exception of the oak T87, within the amended Illustrative Masterplan we have provided all the trees with the NE RPA.
- 2.17 In addition to the trees listed in Table 1, we have also given an off-site Turkey oak T85 the larger NE RPA. This is a precautionary measure as we do not consider that T85 is a Veteran tree.
- 2.18 Veteran and Ancient trees are considered to be irreplaceable habitats. NPPF 193c states that:

"development 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 reasons⁷⁰ and a suitable compensation strategy exists;"

Footnote 70 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.

- 2.19 The list of Direct and Indirect effects of development on veteran trees and ancient woodlands is contained within the Standing Advice '*Ancient woodland, ancient trees and veteran trees advice for making planning decisions*' (CD18.06) . This list is by its nature a catch-all list of all matters that should be considered by Local planning authorities for planning applications with or near to Veteran trees and/or Ancient Woodlands.
- 2.20 Some of the potential effects listed in the Standing Advice are more relevant for Ancient Woodland than individual Veteran Trees. This is because Ancient Woodlands are by their nature a complex, multi-layered eco-system that may have been undisturbed for centuries and may include a variety of habitats including ground flora over a relatively large area, whereas a Veteran tree whilst it can be a complex eco-system may be an individual tree growing within a regularly ploughed field.
- 2.21 For planning applications that involve Ancient woodlands, or Veteran trees growing within old parklands, old wood pasture or other high-quality ecologically valuable habitats many of the Direct and Indirect effects listed in the standing advice will be pertinent.
- 2.22 This site has been subject to excavation and filling of a fishing lake, Proposed formation of angling pond with bunds. (Planning reference F/2002/7111) Approved: April 2003, Proposed infilling of angling pond and re-grading of the land. (Planning reference F/2006/7933) Approved: October 2006. As part of the application decided in 2003 the site was described by WBC as 'degraded'.
- 2.23 There has also been construction of areas of hardstanding, construction of buildings including stables and the block-built barn structure, excavation of ditches, installation of drainage pipes and backfilling of ditches, all with associated machinery movements, and horse grazing, stabling and associated manure heaps. (See Appendix f Google Earth Images 1-4).
- 2.24 From the outset the proposed development has been designed to retain all the veteran trees and the Illustrative Masterplan has subsequently been amended to address concerns raised by WBC. See amended Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026).

2.25 The Arboricultural issues raised by WBC that they consider may impact on veteran trees and may potentially lead to the loss of or deterioration to the irreplaceable habitat namely veteran trees can be divided into:

- a) Root Protection Areas / Buffer Zones
- b) Footpaths and Access in Proximity to Veteran Trees
- c) Drainage Works
- d) s278 Works
- e) Other matters

2.26 I will now address the Arboricultural issues raised by WBC in more detail.

3.0 Root Protection Areas / Buffer Zones

- 3.1 Root Protection Areas are addressed within BS5837: 2012 'Trees in relation to design, demolition and construction. Recommendations' (CD18.05) and for Veteran and Ancient trees within the NE Standing Advice where the terms RPAs and Buffer zone .
- 3.2 The BS5837 caps the Root Protection Area (RPA) for all trees of whatever size (including Veteran and Ancient trees) with a radius of 15m which equates to an area of 707m². The RPA radius is based on x12 the trunk diameter and the BS5837 does not give Veteran trees a larger RPA than other trees with a similar trunk diameter. Within BS5837 this RPA is considered sufficient to secure enough of the tree's root system and rooting environment to support even the largest oldest trees.
- 3.3 The lack of special treatment for Veteran trees in BS5837, was raised by amongst others the Woodland Trust during the public consultation for the current 2012 version of BS5837. During the consultation process the BSI committee chose not to accede to the request for larger RPAs for Veteran trees.
- 3.4 This was identified as a potential issue by Natural England and they recommended in 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' January 2022, known as the 'Standing Advice' that the RPA for Veteran Trees should be x15 the trunk diameter and uncapped, or extend to 5m beyond the canopy whichever is greater. This increased RPA was also named the 'buffer-zone'.
- 3.5 This increased NE RPA, whilst not based on science, effectively incorporated a buffer-zone over the maximum size of RPA in BS5837 to help ensure Veteran trees would be given more space and protection within developments.
- 3.6 WBC requested that the NE Standing Advice recommends that for Veteran trees the NE RPAs are located outside private gardens was followed. Please note T3, T4, T50, are remote from any residential development. T50 is more than 50m, T3 over 75m and T4 more than 100m from the nearest proposed dwelling.
- 3.7 The only veteran tree that was previously close to gardens is T56 on the northern boundary. The Amended Masterplan has removed two dwellings in this area, with this tree now located in an area of open space. As a precautionary measure within the Amended Masterplan we have ensured that the RPAs of both T85 and T87 do not extend into any private gardens or developable area. See amended Illustrative Land Use Plan (Drawing Reference 052403-DAN-MP04-ILUP 04/02/2026).

- 3.8 In relation to the veteran oak T72 WBC requested that this tree was given more space than afforded following the NE Standing Advice to allow for the construction of the road and underground drainage.
- 3.9 In my opinion for WBC to request that the NE buffer-zone is increased to include effectively an additional buffer-zone is unnecessary and is mis-use of the Standing Advice. Nevertheless, the provision of additional space around the NE buffer-zone has been shown in the Amended Illustrative Masterplan. As such the additional space could be delivered as part of the RM application and will be addressed in a detailed Arboricultural Method Statement that will be submitted as part of any RM application.
- 3.10 Chris Hannington WBC Landscape and Tree Officer had previously asked that the Root Protection Areas RPA of veteran trees near highways are adjusted to reflect their growing conditions. This is based on the premise that the rooting environment beneath the road is sub-optimal and roots will be favouring the open ground along the highway verge and within the site.
- 3.11 In my professional opinion this is not correct adjusting the RPA to remove all the area of the RPA within the highway, as there will be some roots growing beneath the highway, but nevertheless by adjusting it by moving 100% of the RPA into the site gives a worst-case scenario that be reviewed.
- 3.12 We have adjusted the RPA of the veteran trees growing close to the highway boundary T3, T4 and T50, to take all of the larger NE RPA from beneath the road and show this within the open ground. These adjusted NE RPAs are shown on the tree survey overlaid on the Amended Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026). These RPAs are remote from the proposed built development area and outside the proposed SUDs, the footpath around the south-western corner of the SUDs basin is outside the edge of the adjusted RPA of the veteran oak T50. See Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026).
- 3.13 WBC also asked that we adjust the RPAs to address the proximity of trees to other trees. In my professional opinion this is not a valid request there is no recommendation or mention in any guidance including in BS5837 2012 or NE Standing Advice to adjust Root Protection Areas due to the presence of other trees and their root systems. This is because tree roots grow in three dimensions, whilst RPAs are measured as an area, but really relate to a volume of soil that is necessary to support the tree.

- 3.14 Trees growing in close proximity to each other do not require additional rooting area to survive. When growing in close proximity to each other the trees grow to a size based on the prevailing conditions. Trees in groups do not require an adjusted / increased Root Protection Area.
- 3.15 This can be seen from the NE Standing Advice, the minimum buffer zone width for Ancient Woodland is 15m, the guidance does not ask that the buffer zone increases in width depending on the density of the trees growing in the woodland.
- 3.16 It should be noted that whilst the Root Protection Area is a design constraint, the RPA also informs an area that will be fenced-off with Tree Protection Fencing to prevent damage to trees and its growing environment during construction works. For all the trees on-site the fenced-off 'Construction Exclusion Zone' (CEZ) will extend further and protect a greater area from disturbance than the RPA. The Tree Protection Plan will be submitted as part of the Reserved Matters Application.
- 3.17 For example; T3, T4, T39 and T50 are located in an area of ground to the west of the watercourse, this land will be fenced-off and excluded from all ground works and construction activity. The only works proposed in this area is a footpath access onto Church Lane which is outside the buffer zone of any veteran trees but will be undertaken as a discrete operation in an area that is remote from the retained Veteran Tree. As requested by WBC the Amended Illustrative Masterplan shows the footpath routed to the south and outside the RPA of the veteran Lime tree T39. (Drawing Reference 052403-DAN-MP04 04/02/2026)
- 3.18 Likewise for T72, the fenced-off CEZ can extend to the east to protect an area that links up with the eastern boundary and link with the CEZ around T87 to the south-eastern corner. Again the only works in this area are the potential provision of footpaths and landscaping works.
- 3.19 The impact of landscaping works including footpath and increased public access around T72 will be addressed in the section 4 of this statement.
- 3.20 In the amended plans the oak T72 has been provided with an additional 2m strip of ground outside the NE RPA, along the edge of the proposed roadway within the development area. See amended Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026). The circular NE RPA buffer zone for this tree has a radius of over 28m and extends extends to cover 2524m².

- 3.21 The 2m increase in the radius of this buffer zone requested by WBC increases the area to cover 2893m². This equates to an overall increase in the area of the buffer zone of 14%. The BS5837 (2012) RPA equates to 707m².
- 3.22 The oak T72 is located within an area of open space that extends from this tree for a distance of over 120m towards the farthest point of the eastern boundary. See amended Indicative Land Use Plan (Drawing Reference 052403-DAN-MP04-ILUP 04/02/2026).
- 3.23 T72 along with the other veteran and notable trees can be protected during construction works by Tree Protection Fencing that can protect an area of open ground larger than the buffer zone as a 'Construction Exclusion Zone'
- 3.24 The oak T4 between T3 and T50 is located to the southern side of the triangular area of open space to the western boundary of the site that extends for over 160m to the north-western corner of the site. See amended Indicative Land Use Plan (Drawing Reference 052403-DAN-MP04-ILUP 04/02/2026)
- 3.25 The amended Indicative Land Use Plan (Drawing Reference 052403-DAN-MP04-ILUP 04/02/2026) shows that 2.55 Ha of the site can provide Landscape Amenity Green Space, whilst 3.88 Ha of land is allocated for Housing and Supporting Infrastructure to deliver the 111 dwellings.
- 3.26 Providing the NE Standing Advice is respected within the detailed layout design and the appropriate tree protection measures are implemented during works as per the detailed Arboricultural Method Statement both of which will be part of any reserved matters application, it follows that many of the potential direct effects of construction works outlined within the Standing Advice will have been addressed.
- 3.27 The detailed design of the proposed layout will be addressed through Reserved Matters application, the Amended Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026) shows that 111 dwellings can be provided whilst providing significant areas of open space extending for circa 2.55ha and also complying and exceeding the provision of the relevant RPAs as outlined in the NE Standing Advice and BS5837 (2012). Consequently I consider that the amended plans address the issues of potential encroachment on RPAs and have been demonstrated to have been resolved.

4.0 Footpaths and Public Access in Proximity to Veteran Trees

- 4.1 WBC requested during the joint site meeting that footpaths were removed where they passed through the NE RPA of the Lime T39. Within the amended Illustrative Masterplan. (Drawing Reference 052403-DAN-MP04 04/02/2026) the footpath link running north to the western side of the lime T39 has been removed and the pedestrian access onto Church Lane has been moved to be south of T39.
- 4.2 Footpaths are shown around the veteran oak T72, the footpaths are within the buffer zone at a distance of approximately 16m. This is outside the BS5837 (2012) Root Protection Area which is capped at 15m.
- 4.3 With regard to the existing ground conditions, it is my opinion that these footpaths could be delivered without impacting on the health, longevity of the tree or associated habitats. The detailed design for the footpath and landscaping works within the Construction Exclusion Zone would be dealt with in a Reserved Matters application and detailed information on these works would be included in an Arboricultural Method Statement.
- 4.4 In 'Ancient and other veteran trees: further guidance on management' Lonsdale (2013) (CD18.04) gives advice on this matter and states that:

3.1 GENERAL GUIDANCE

Do not, on any account, create any permanent vehicular access route, gateway, ditch or underground utility route within the RPA of a veteran tree. If an access route or gateway already lies within the RPA, it should, if feasible, be removed or re-designed, according to advice from a suitably qualified arboriculturist.

3.5.3 Tree protection in recreational and other intensively used areas

3.5.3.1 Protection of rooting areas from compaction and other damage

Given that a physical barrier (as on a construction site) is not appropriate in most recreational areas, the RPA should preferably be delineated from the surrounding land by regular mulching or by allowing the grass to grow longer and rougher than elsewhere on the site. Depending on the use of the recreational area, the presence of rough grass within the RPA might be considered sufficient to divert harmful activities elsewhere.

If relatively intense recreational use of the RPA of a veteran tree cannot be completely avoided, the ground should be protected (e.g. by the re-routing of an access route or by means of a load-spreading surface or a raised walkway or driveway).

- 4.5 As can be seen from this text public access and footpaths within the RPA of trees are considered to be acceptable. The routes of footpath and any special construction methodology to avoid excavation if required will be a matter dealt with as part of the reserved matters application.

- 4.6 There is a balance between the potential limited impact of the footpath and the wider benefit of allowing people to see the trees and access open space, whilst maintaining some control over the most used routes.
- 4.7 The Ancient Tree Forum (in partnership with City of London Corporation), the National Trust and English Heritage all promote veteran Tree trails across a number of sites including Ancient Woodlands, where these footpaths lead the public to view specific veteran trees often on fully accessible footpaths. (See Appendix d for examples).
- 4.8 It should be noted that Public Access is not necessarily detrimental to the health and condition of veteran Trees. Veteran trees can survive in areas of high public access for example:
- Richmond Park** located in south-west London contains one of the most important collections of Veteran trees in Europe estimated to number approximately 1300 trees in a 2500 acre parkland that has over five million visitors each year. The site has roadways and footpaths running through and around the park with 7 main visitor car parks.
- Windsor Great Park** to the west of London contains one of the most important collections of Veteran trees in Europe with approx. 3000 veteran trees and covers approximately 5,000 acres of parkland. Windsor Great Park has almost three million visitors every year with 8 visitor car parks.
- Epping Forest** contains Europe's largest collection of over 55, 000 Veteran trees growing within Ancient woodland, and is located in a highly populated part of north-east London with the M25 to the north and the north circular to the south and bisected by a number of busy road. Epping Forest has over ten million visitors each year, with numerous roads running through the woodland. Epping forest has 15 visitor car parks
- 4.9 If footpaths within NE RPA are considered unacceptable then they can be removed as part of the detailed design associated with the Reserved Matters application
- 4.10 The long-term policy for managing veteran trees and the surrounding open spaces can be secured as part of a Landscape Management Plan / Ecological Management Plan or as a standalone veteran Tree Management Plan and information on this can be included in any BNG Habitat Management and Monitoring Plan which covers 30 years post development.
- 4.11 WBC can serve a Tree Preservation Order to ensure that any management works to the trees are subject to the TPO application and consent process, which will give the LPA control over any pruning works or applications to remove trees.

- 4.12 Post development a management company will be appointed to manage the open space and retained trees included all the on-site Veteran Trees. It should be noted that appropriate management can prolong the life-expectancy of the veteran trees, these works can range from improving drainage to prevent waterlogged soils, improving soil health by alleviating historic compaction, mulching some of the ground around trees, and undertaking appropriate tree pruning works.
- 4.13 WBC raise 'trampling of habitats' as a potential issue. This effect within the NE guidance comes from the potential for footfall to damage habitats such as the ground flora often associated with Ancient Woodlands. In the NE Standing Advice it is stated within the guidance on buffer zones *'You should consider if access is appropriate. You can allow access to buffer zones if the habitat is not harmed by trampling'*.
- 4.14 It is unclear which habitats WBC consider need protection from public access, but if this is necessary then it can be achieved by detailed Landscape design which will be addressed in the Reserved Matters Application.
- 4.15 Risk Management of Trees does not need to remove risks associated with trees, in simple terms it should manage the risks at as low as reasonably practicable levels. This management also needs to consider the benefits associated with trees, managing or removing trees without considering the benefits results in poor decisions and is not good practice.
- 4.16 The benefits associated with veteran trees are significant, whilst the risks of injury associated with trees including veteran trees are very low. For this reason risk management is not a valid reason to suggest that this will result works that will be detrimental to the health and longevity of the trees.
- 4.17 Publications such as 'English Nature and Ancient and other veteran trees: further guidance on management' Lonsdale (2013), 'Veteran trees: A guide to risk and responsibility' Davis, Fay & Mynors (2000) and 'Common Sense Risk Management' National Tree Safety Group 2004 give further detailed information on this matter.
- 4.18 With regard to the, the extent of the open space provided as part of this application and the current site conditions it is my opinion that the impact of any footpaths and public access associated with this development can be managed by careful design to prevent it having any significant impact on the condition of the veteran and notable trees and any other associated habitats.

5.0 Drainage Works

- 5.1 The drainage on site results in water-logging in various areas including in proximity to T72.
- 5.2 With the exception of the tree species adapted to these conditions such as alder, willow and poplar, waterlogged soils are not good for trees including oak trees.
- 5.3 Waterlogging impacts on the structure of the soil, it results compaction and in anaerobic conditions which impact on the ability of roots to undertake gaseous exchange that is needed for growth. Waterlogging and compaction also impact on the invertebrates and microbes which maintain the soil health which is needed for healthy trees.
- 5.4 Section 3.7 of Ancient and other veteran trees: further guidance on management Lonsdale (2013) (CD18.04) deals with 'Amelioration of Existing Compaction and Other Soil Damage', which includes waterlogging. This states that:
- The main aspects of adverse soil condition capable of amelioration include:*
- *soil compaction (including poor drainage and poor aeration)*
 - *impoverishment or disturbance of soil microflora*
 - *nutrient enrichment.*
- 5.5 These three issues can be addressed as part of the Drainage Strategy and within the Landscape Management Plan.
- 5.6 WBC raised an issue that the indicative drainage strategy showed a swale within the RPA of veteran oak tree T50. The indicative drainage strategy has been amended to clarify this matter but in proximity to T50 this is an existing defunct ditch to be cleared and an existing culverted farm access being removed. The careful clearance of old ditches can be undertaken without detriment to retained trees. This type of works have been undertaken for many centuries in proximity to trees across the UK. The details on these works can be addressed by use of an Arboricultural Method Statement.
- 5.7 It should be noted that the ditch along the eastern boundary that runs past the oak T87 has been culverted. This has been undertaken without any apparent detriment to the health of the oak tree, but nevertheless the ditch could be reinstated as part of the drainage strategy.
- 5.8 The detailed drainage strategy will be dealt with as a Reserved Matter. It is my opinion that a well-designed drainage strategy has the potential to improve the growing conditions for the existing trees on site.

6.0 S278 Works Reading Road

- 6.1 The most important trees on the southern side of Reading Road are the oaks T127, T129 and T130 growing on the bank and verge to the southern side of the pavement. The SoCG states in paragraph 1.2 *'The widening of the footpath should not have detrimental impact on T127, T129 and T130, so long as the footpath is widened into the carriageway so as to avoid tree roots.'*
- 6.2 The footpath widening works in this area have now been designed to build the footpath out into the existing carriage way. These works can be designed to avoid excavation beneath the existing depth of the highway sub-base. See Milestone Transport and Planning D Enhanced Active Travel Linkages to Local Facilities + Services on Reading Road (Sheet 2 of 2) Plan 25103 / 001 / 02 / Rev D.
- 6.3 It is my opinion that subject to appropriate design and by following good practice for working in proximity to trees the proposed footpath improvements to the southern side of Reading Road can be delivered without any significant impact on the highway boundary vegetation.

7.0 Other matters

- 7.1 The amended Indicative Land Use Plan (Drawing Reference 052403-DAN-MP04-ILUP 04/02/2026) shows that 2.55 Ha of the site can provide Landscape Amenity Green Space, whilst 3.88 Ha of land is allocated for Housing and Supporting Infrastructure to deliver the 111 dwellings.
- 7.2 WBC raise the issue of connectivity between habitats on site, the proposed masterplans show two areas of open space to the eastern and western parts of the site with existing trees retained and proposed trees planted along the northern boundaries, parts of which to the eastern side are post and rail fencing. The existing hedge is retained to the southern part of the eastern boundary supplemented by new tree planting and the currently open field boundaries on the eastern boundary are planted with new trees.
- 7.3 The proposed development is set-back from the Reading Road boundary, a large proportion of the site highway boundary approximately 130m from Church Lane eastwards will have existing open space and then attenuation basins to the northern side of the highway boundary. To the south of the proposed residential development area with the exception of the main access and emergency access the retained and proposed landscaping maintain a green corridor along the highway boundary.
- 7.4 The Church Lane boundary is located to the western edge of the triangular area of open space, with the watercourse forming the eastern boundary of the open space. This area will be unaffected by the proposed development.
- 7.5 It is my opinion that the development provides the opportunity to enhance the boundary vegetation, planting up currently open field boundaries and retaining and enhancing the majority (with the exceptions of the proposed site access points) of the existing boundary vegetation.
- 7.6 WBC has referred to the potential to retain some younger oak trees within the site referring to G73 and T74. Within the amended Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026) some of the young oak trees within group G73 can be retained within the open space around T72. The semi-mature oak T74 cannot be retained within the Illustrative masterplans.

- 7.7 These trees are all semi-mature self-set trees of limited landscape and amenity value. There are other smaller self-set oak trees not shown on the survey due to their size that are becoming established on-site, for example in the open space to the western side of the site.
- 7.8 The open space within the proposed development will provide a suitable location for oak trees to become naturally established. Any open areas that are not subject to mowing will be suitable for acorns which will be dispersed by jays and squirrels to start growing. Some of these trees can be allowed to establish if required. This matter can be dealt with within a Landscape Management Plan.
- 7.9 WBC referred to the original tree survey submitted as part of this application which did not include trees to the north-western corner of the site. This area was overgrown and was not included in the original Topographical Survey. The trees in this area were not shown on the original tree survey. This area is remote from any development and no tree works are proposed in this area. We have added indicative information on these trees to the tree survey information submitted for this inquiry. (See Arboricultural PoE CD13-03).

8.0 Potential Benefits for Veteran Trees.

8.1 With appropriate design and specification the proposed development can positively impact on the growing conditions of for the veteran trees. These potential positive effects of development on this site include.

- a) Identification and protection of veteran and notable Trees,
- b) Improved growing conditions around trees for example removal of compaction and waterlogging, cessation of deleterious effects of grazing, livestock, agriculture and other activities. See 8.2 below.
- c) Removal of the 10m x 5m block-built barn and larger concrete slab (within 3m and entirely within the RPA) of the Notable tree T87. As shown on the Amended Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026). This area will form part of the 13m wide landscaped area along this boundary.
- d) Restoration of defunct ditches and culverted ditches.
- e) Securing open space around the veteran Trees.
- f) Management of the open space and other areas around the site including corridors around the boundary that can improve the connectivity of the green infrastructure.
- g) A long-term mechanism to undertake appropriate management of the veteran Trees.
- h) Future residents can take interest in, ownership of and be protective of their environment including veteran trees.
- i) Establishment of self-set and planted trees, and other habitats within the site.
- j) Compliance with BNG on-site will ensure that the biodiversity value of the site will be improved.

8.2 The deleterious effects in point b above include manure heaps leaching into the water on site increasing nutrient levels, horses poaching (leading to compaction and waterlogging) the ground, grazing preventing saplings from growing and so forth.

8.3 Some of these positive effects such as alleviation of compaction and waterlogging are outlined as good management on page 63 of 'Ancient and other veteran trees: further guidance on management' Lonsdale (2013) (CD18.04).

If soil compaction is already a problem (owing either to long-term site use or to a particular event), it should be relieved, if feasible, using methods designed to avoid further harm to the tree(s) (see 3.7 and BS 3998: 2010). Mulching should be a preferred option where site use permits (i.e. perhaps not in localities where significant problems are likely to occur as a result of the mulch materials being kicked or blown around).

If an ancient or other veteran tree is currently affected by any harmful activities or if its RPA has been partly or completely covered with paving or tarmac, remedial action should be taken.

9.0 Conclusion

- 9.1 It is my opinion based on the published guidance and experience of other projects involving veteran trees that the proposed development as shown on the amended Illustrative Masterplan (Drawing Reference 052403-DAN-MP04 04/02/2026) can be delivered, subject to appropriate tree protection measures, without negatively impacting on the longevity and biodiversity value of the existing veteran trees.
- 9.2 The arboricultural information and tree protection measures needed to ensure the works are undertaken without detriment to the retained trees will be based on the detailed layout that will be submitted as part of a Reserved Matters application. This information will be included within a detailed Arboricultural Method Statement which can be secured by use of standard planning conditions.
- 9.3 With regard to the size of the proposed open space to be retained around the veteran trees, the risk associated with the indirect effects of the proposed development on the veteran trees are considered to be negligible and can be addressed through landscape proposals and a detailed Landscape Management Plan.

Appendix

- a.) Email From: Joanna Carter WBC: 16 January 2026**
- b.) T87 Veteran or Ancient**
- c.) Ancient Tree Inventory Aerial Image**
- d.) Examples of Veteran Tree Trails**
- e.) Annotated version of the Amended Tree Removals Plan
(052403-DAN-MP04-TRP 04/02/2026) showing the location of
Veteran and Notable trees - all retained.**
- f. Google-Earth images of Site**

Appendix a

Email From: Joanna Carter WBC Sent: 16 January 2026

Email Addresses Removed

From: Joanna Carter

Sent: 16 January 2026 09:35

To: Brigid Taylor

Cc: Rodwell St Clair; Steven Brown; Brian Conlon, Planning Appeals

Subject: RE: Land North of Reading Road Arborfield APP/X0360/W/25/3371069 (243099)

Dear Brigid,

Thank you for your email. Please find responses to your queries set out below on a without prejudice basis:

1. Additional Issue 1 (LVGV): as you will be aware from correspondence produced by Highways Department to the Appellant's Transport Consultant (12th January 2026), the LPA and the Appellant's transport consultant are in an ongoing dialogue with regard to what potential mitigation measures might be. As it might be expedient for the parties to avoid the need to undertake traffic modelling, we hope that discussions might enable both parties to agree additional mitigation measures which could "*cost-effectively mitigate impacts on transport network to an acceptable degree through a vision-led approach*", consistent with paragraph 115(d) of the NPPF. Subject to the outcome of these discussions with our Highways colleagues, we believe this could be a pragmatic way forward for the Appeal.
2. Additional Issue 2 (visibility splays): subject to further detail required as outlined in email from Highways Department to the Appellant's Transport Consultant (12th January 2026), it is anticipated this issue would be resolved prior to Inquiry and position on this confirmed in the Highways SoCG.
3. Additional Issue 3 (irreplaceable habitats):

Ancient and veteran trees are addressed within the planning system principally in the NPPF and in the Standing Advice on Ancient Woodland, Ancient and Veteran Trees and Development, and in guidance in BS 5837 (2012) and LONSDALE. The relevant documents were provided with the LPA's SoC and are attached for your convenience. Advice that predated LONSDALE is also included and will be added to the list of core documents (READ H, Veteran trees: A guide to good management (2000) English Nature) – it is available online at [Veteran Trees: A guide to good management - IN13](#). The note from late Dr Lonsdale is also attached.

The Council has concerns that Figure 1.3 in LONSDALE has been mis-understood and this has led to a misleading upgrading of the 'size' bar so that smaller trees are no longer considered. The Council's view is supported by advice directly from the late Dr Lonsdale. The Council has concerns over the tightness of the layout which does not allow for Construction Working Zones around RPAs/Buffer Zones of ancient and veteran trees. CWZ's are detailed in BS 5837 (2012) as is the need to keep structures out of RPAs (and by extension Buffer Zones of ancient or veteran trees) – the default position. Such tightness threatens ancient or veteran trees.

The Council has concerns that insufficient thought and space have been shown to allow for compensatory off-setting to allow for environments hostile to the proper retention of sufficient

RPAs/Buffer zones i.e. parts of RPA/Buffer Zones owned by neighbours and parts of RPAs/Buffer zones under the hostile environment of the adjacent Reading Road and associated infrastructure. The submitted Drainage Strategy indicates that surface water drainage features are proposed within RPAs/Buffer Zones, which can damage roots and soil structure. The drainage strategy relies on physical features that appear to be likely to disrupt or interfere with the root systems of ancient or veteran trees. In addition, changes in the hydrology of the site and their likely damaging impacts on ancient or veteran trees have not been addressed.

Detailed notes on specific trees

The trees that the Council has concerns with are seven trees in total. One ancient/veteran, five veterans and a mature oak with features of veteranisation (a veteran of the future). The Council also have concerns over the proposed removal of young trees from the RPA/Buffer Zone of the ancient/veteran tree.

The trees are all shown in the Ancient Tree Inventory (ATI), apart from three: one veteran tree shown in the Appellant's tree survey and two mature trees adjacent to the site. More detailed notes are given below. For ease of reference the trees are listed in number order (except T50 which is part of a close group of mature, notable and veteran trees) with notes on the Council's concerns:

Trees T3, T4 and T50: T3 (notable and future veteran, adjacent to red-line boundary), T4 (possible veteran – adjacent to red line boundary) and T50 (veteran – within red line boundary), should be assessed as a group ancient and veteran tree asset and individually, particularly given the need to be clear how they interact with each other and with the adjacent Reading Road. The Appellant should demonstrate the likely impacts of the development (including the SuDS system and footpath) on the shapes and extents (and compensatory off-setting) of their individual RPAs and Buffer Zones.

Tree T39: (veteran lime – within red line boundary). The Council's concerns are over the shape and extent of the Buffer Zone, the indicated presence of footpaths and the 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.

Tree T56: (veteran oak - within red line boundary) Buffer Zones are shown to be in gardens and within private offsite land. 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.

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. Concerns also arise due to the proposed 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.

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), 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).

Whilst it is acknowledged that the layout is indicate only, the proposal needs to demonstrate it would not lead to deterioration of irreplaceable habitats. The Council considers 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. It is essential that the tree survey is overlaid over any indicative layout and drainage strategy so that these juxtapositions can be properly assessed.

Kind Regards,

Joanna

Joanna Carter LLB LLM MA MRTPI
Principal Planning Officer
Development Management and Compliance
Planning, Economy and Culture
Wokingham Borough Council

Appendix b

T87 Veteran or Ancient

T87 is in my opinion still in the veteran stage of life as it has not started to significantly reduce its' overall canopy size.

Veteran is considered to be part of the mature stage of a trees' life, some branch failure can be expected in the Veteran stage.

In simple terms ancient trees are veteran trees that are undertaking crown reorganisation (also known as retrenchment), the canopies are becoming smaller and lower and at the same time the root system is reducing, with the extent of decay and or hollowing is increasing.

This can be seen from images below from 'Trees a lifespan approach' Neville Fay et-al. 2016, From Ancient and other veteran trees: further guidance on management Editor David Lonsdale (2013 CD18.04) which was unfortunately originally published as a blurred image and from the image from What are ancient, veteran and other trees of special interest? Woodland Trust 2008.

T72 is in my opinion still in the veteran Phase as it has not started to undergo 'retrenchment' or crown reorganisation by significantly reduce its' overall canopy size.

Ancient trees reorganise their canopy, whilst reducing their overall root volume and at the same maintain the functional live growth necessary for its annual incremental trunk growth which is required for the tree to continue to live.

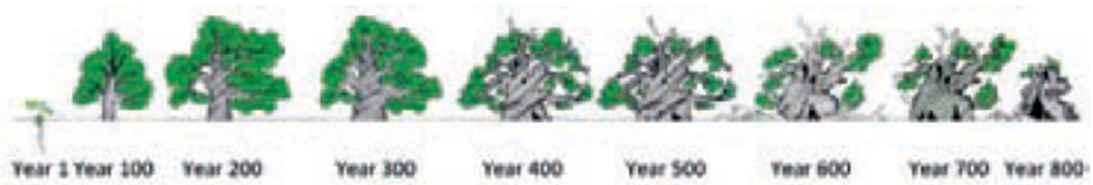


Fig 7.2: Stages in the life of an ancient tree

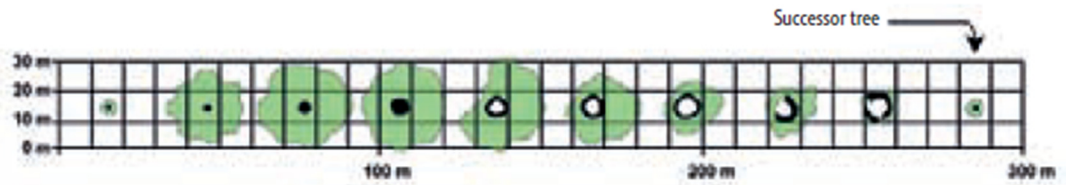


Fig 7.3: Space required for a large-crowned tree at different stages of its life and for a successor tree

From Ancient and other veteran trees: further guidance on management Editor David Lonsdale 2013 (the image as published in this book is blurred)

Diagram showing the stages in the life of an ancient tree



The ancient phase may be the longest phase in the tree's life and the most valuable for associated wildlife

Ancient Tree Guide no.4:What is an ancient tree?

3

From Practical Guidance Ancient Tree Guide 4: What are ancient, veteran and other trees of special interest? Woodland Trust 2008

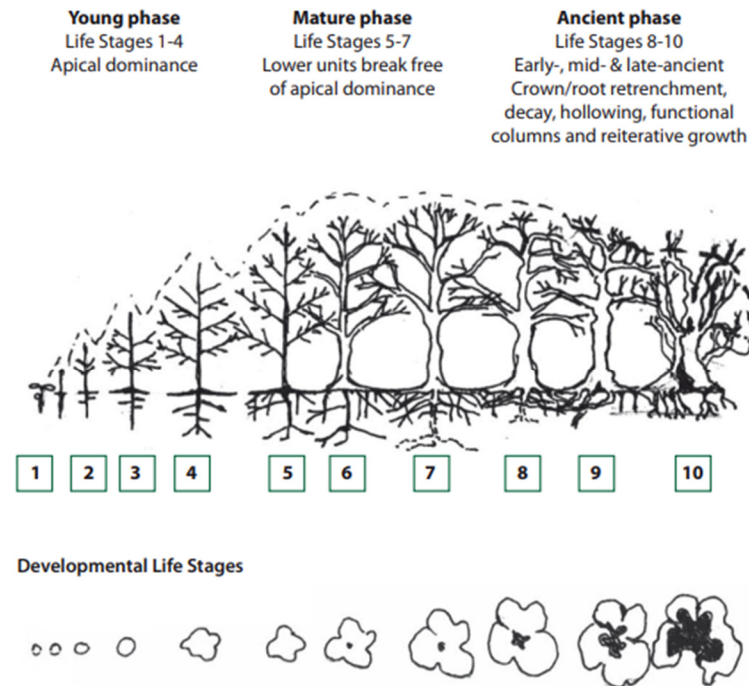


Fig 2: Morpho-physiological stages of development: Developmental stages of (a) aerial & root systems through the ageing process corresponding to (b) trunk decay habitat (after Raimbault 1995; Lonsdale 1999; Fay 2002).

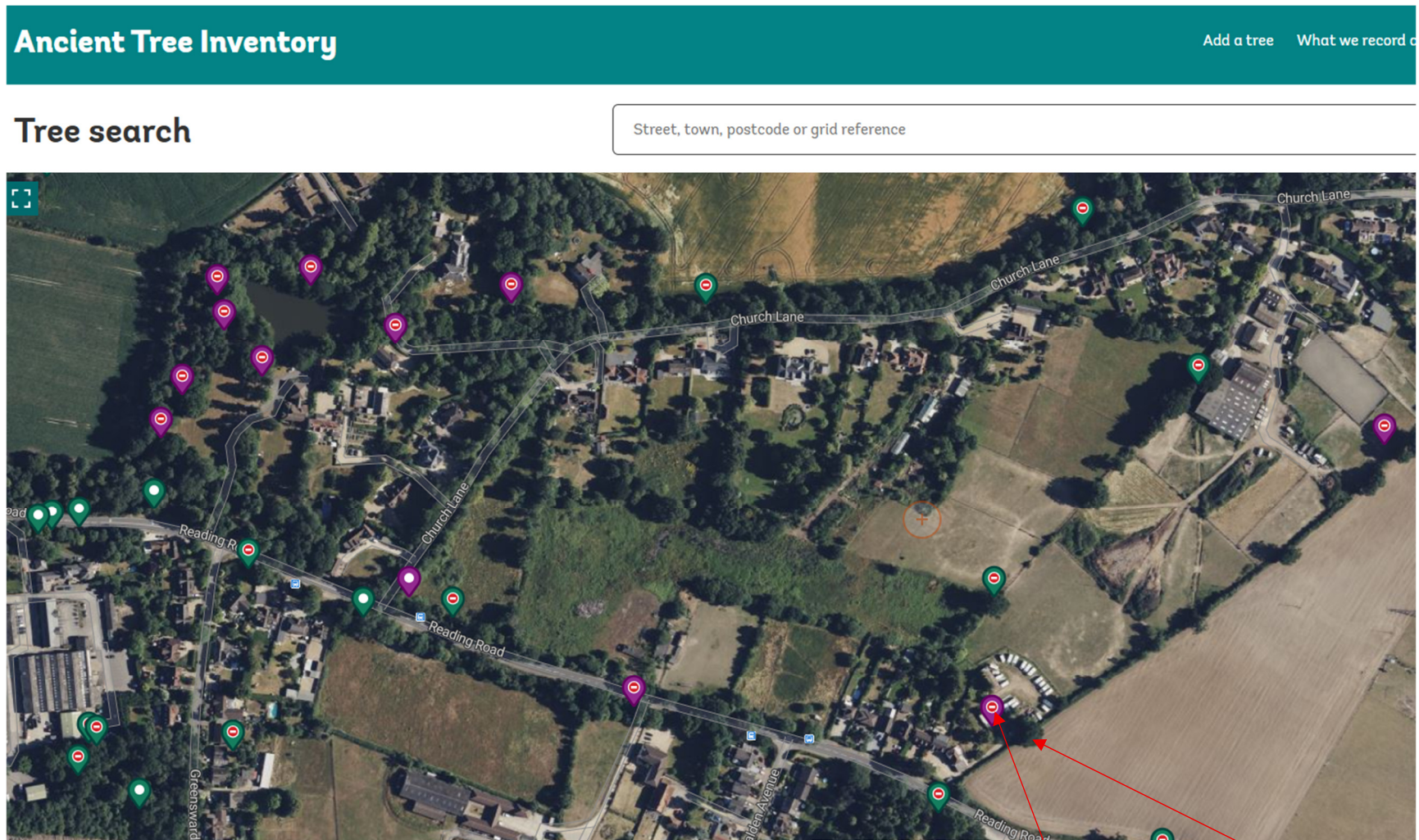
From Trees – a Lifespan Approach Contributions to arboriculture from European practitioners Dirk Dujesiefken, Neville Fay, Jan-Willem de Groot, Nigel de Berker 2016



Fig. 69: Ancient tree with wounds, decay, trunk hollowing, branch cavities, broken branches, damaged bark, fungal fruiting bodies. All these wounds and colonisable *saproxyl*ic habitats are *veteran* features. There are many more habitats out of sight, internal and below ground.

From Trees – a Lifespan Approach Contributions to arboriculture from European practitioners Dirk Dujesiefken, Neville Fay, Jan-Willem de Groot, Nigel de Berker 2016

Appendix c. Ancient Tree Inventory Aerial Image



Ancient Tree Inventory Aerial Image

Veteran Tree Green, Notable Tree Purple, No Entry Sign relates to public access

Please Note Tags are off-set from trees on aerial image,(showing T87 tree location)

Appendix d. Examples of Veteran Tree Trails



These pages showcase the pioneering veteran tree management on four sites owned by the City of London; Ashted Common, Burnham Beeches, Epping Forest and Hampstead Heath. Self-guided trails have been devised at each site to allow people to visit and see for themselves the work that has been undertaken to safeguard veteran trees on these sites.

<https://www.ancienttreeforum.org.uk/ancient-trees/ancient-tree-sites-to-visit/veteran-tree-trails/>

Epping Forest

Veteran Tree Trail

https://www.ancienttreeforum.co.uk/wp-content/uploads/2019/07/EFVTTtext_v1_July-2019.pdf

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THINGS TO SEE AND DO

Home > Visit > Places To Visit > Belsay Hall, Castle And Gardens > Things To See And Do > Belsay Hall Veteran Tree Trail

BELSAY HALL VETERAN TREE TRAIL | BELSAY AWAKES | SEASONAL GARDEN HIGHLIGHTS

BELSAY HALL VETERAN TREE TRAIL

Here you'll find all you need to know about the Belsay Veteran Tree Trail, an audio adventure you can take with your smartphone around the glorious Belsay gardens.

Many of the trees at Belsay are rather special. Some are classed as ancient, veteran, heritage or notable, and many of them have got a story to tell.

As a celebration of the status of these trees at Belsay, and in partnership with the Northumbria Veteran Tree project, you can listen to the trees tell stories about their own origins and Belsay's history on the Veteran Tree audio trail.

The trail is available on an app that you can download to your phone. Follow the map as you wind your way around Belsay's gardens and listen to the tales told by the trees.

Starting with a welcome from the group of silver birch trees found on the grassy mound between the Stables and the Hall, the story will start to play when you have the app open and head towards the trees. Each tree with a story is identified by the white veteran tree trail tag to help you identify the tree.

The stories were written by members of the local U3A writing group. They have been narrated by a combination of writing group members, some of Belsay's staff and volunteers, and Nick Johnson who leads the Veteran Tree Project in the region.

To download the app, search for 'Veteran Tree Trail' if you have an Apple phone, or 'Tree Trails and Tales' on Android phones.

<https://www.english-heritage.org.uk/visit/places/belsay-hall-castle-and-gardens/things-to-do/belsay-hall-veteran-tree-trail/>



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Ancient tree walks



Visitors in the woodland at Fountains Abbey and Studley Royal Water Garden, Yorkshire | © National Trust Images/James Dobson

If ancient trees could talk, they would have some tales to tell. Walk among their tall and gnarled trunks, which are not only steeped in history but also invaluable to wildlife. Here are some of the best walks to see and be close to ancient trees.

<https://www.nationaltrust.org.uk/visit/walking/ancient-tree-walks>

Appendix e

**Annotated version of the Amended Tree Removals Plan
(052403-DAN-MP04-TRP 04/02/2026)
showing the location of Veteran and Notable trees - all retained.**



Appendix f

Google-Earth images of Site



Image 1 Google Earth Image dated 01/01/2003

Showing a fishing lake, evidence of machinery access to north and east of fishing pond, area of informal hardstanding to east of fishing pond (Indicative redline)



Image 2 Google Earth Image dated 01/01/2003

Close up of the fishing lake, evidence of machinery access to north of fishing pond, area of informal hardstanding to east of fishing pond



Image 3 Google Earth Image dated 01/01/2005

Showing a fishing lake, some evidence of access to north of fishing pond, area of informal hardstanding to east of fishing pond

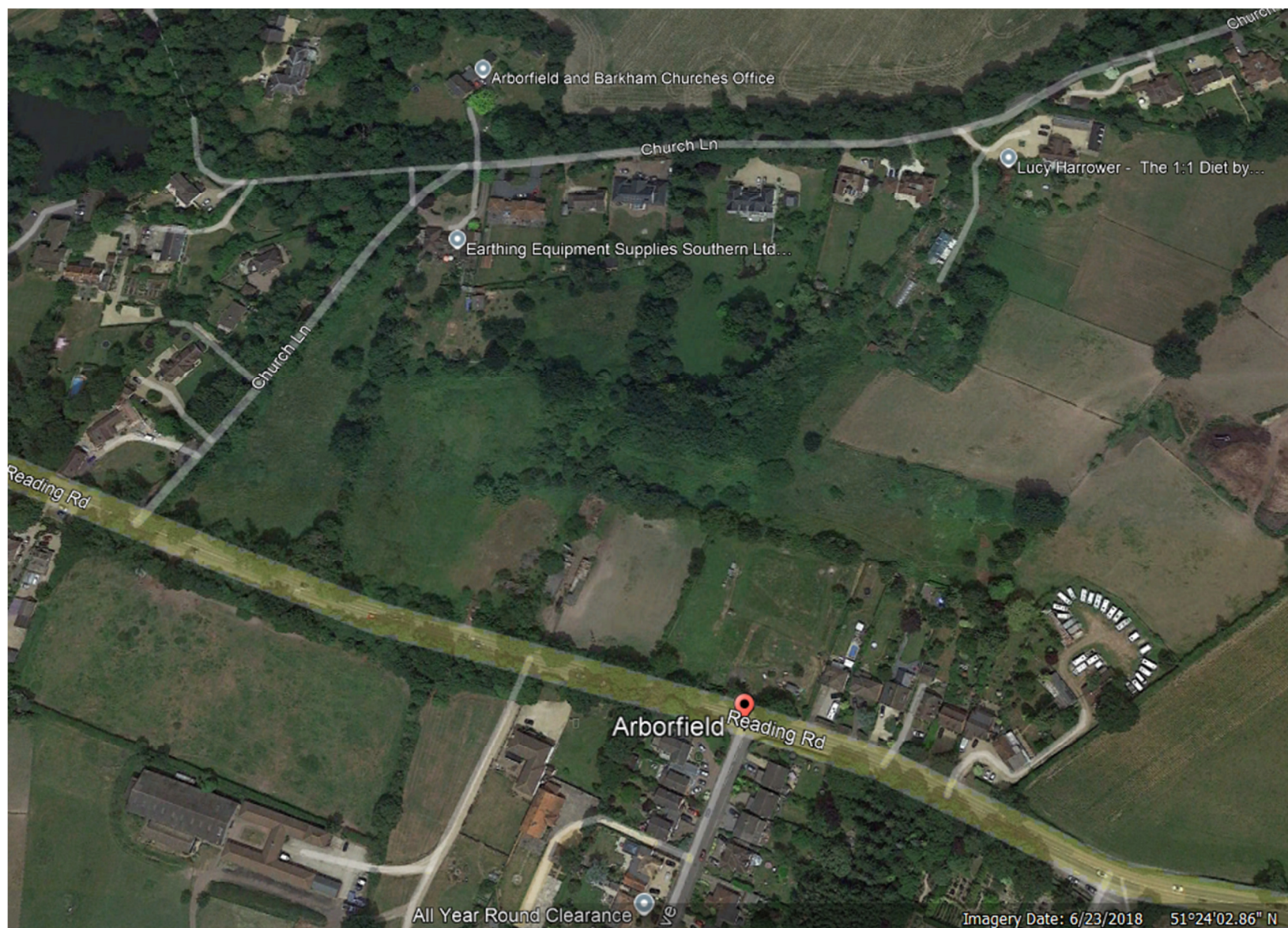


Image 4 Google Earth Image dated 01/01/2018
Showing the fishing lake filled in.