

MEMORANDUM

From:	Brigitte Crafer Landscape Architect		
Service	WBC Landscape and Trees	App No:	250517-Rev. A
Address:	Land Off Basingstoke Road, To the south and west of Spencers W.		
Proposal:	Outline planning permission is sought with all matters reserved for future determination, save for the means of access via Basingstoke Road, for: up to 420 dwellings (Use Class C3), an 80 bed care home (Use Class C2), 1ha of employment land (Use Class E(g), primary school (Use Class F1), local centre (Use Classes E(a), (b), (c), (f)), GP Surgery (Use Class E(e), sports pitch and changing facility, public open space, SANG provision and associated infrastructure.		
Type of Development:	Major All other developments		
Site Visit Made:	Yes/No		

Summary Of Recommendations

- ☐ No comment
☐ No objection
☐ No objection subject to conditions (and reasons) **stated below**
☐ Request further information before determination as **stated below**
☒ Objection due to the reason(s) **stated below**

Comments On Proposal

Notwithstanding that the location of the proposed development is contrary to policy CP11 of the Core Strategy as it is outside the settlement boundary of Wokingham in the countryside and not an allocated housing site, I provide the following comments on the technical information provided with the application.

Referring to the following plans and documents;

- *Covering Letter from Marrons – Ref. 902832.30 19th February 2026*
- *Parameter Plan Ref. P23-2449_DE_012 Sheet 1 Rev. B*
- *Illustrative Landscape Masterplan (ILM) Drawing Ref. P23-2449_EN_0009_C_ILMP – Rev. C 23.01.26*
- *Development Framework Plan Drawing Ref. P23-2449_DE-001-02 Rev X (revision not dated)*
- *Design and Access Statement – Issue 2 For submission following amendments 11.02.2025 (or is it 2026?)*

1.Covering Letter from Marrons – Ref. 902832.30 19th February 2026

Introduction of a minimum 5m wide ecological and landscape buffer along the northern boundary to provide continuous dark corridor for bats, alongside adjustments to avoid the Notable Tree buffer.

The ecological buffer is shown in Parameter Plan Ref. P23-2449_DE_012 Sheet 1 Rev. B

I have measured the buffer on the Parameter Plan which is minimum of 5m but the Parameter Plan is a basic plan of the outlines of the different parcels. When comparing the ecological buffer on the Parameter Plan with the Illustrative Landscape Masterplan (ILM) Drawing Ref. P23-2449_EN_0009_C_ILMP – Rev. C 23.01.26 which demonstrates the latest Development Framework Plan and SANG design the measurements differ considerably in illustrating the layout.

The proposed Ecological buffer at a minimum of 5m wide should be influenced by the tree line and edge of the collective RPA. Where Veteran trees are present such as G83, the correct Veteran tree buffer zone (VT BZ) needs to be provided. The Government Standing Advice on Veteran trees and development is clear with respect to the types of development/planting that is acceptable in the VT BZ which will be a constraint to development and needs to be factored into the layout early in the process. If this is the case then a wider buffer may need to be provided to accommodate the VT BZ and the landscape enhancements.

2.Arboricultural Report

An Arboricultural Impact Assessment (Incorporating tree protection measures) was submitted by the Environmental Design Partnership (EDP) .Ref. edp8458_r002c February 2025 and reviewed in my previous comments;

‘The report sets out the nature and extent of the tree losses and provides mitigation and protection measures to ensure the viable long term retention of retained trees in the context of the development proposals’.

The AIA has been prepared using EDP’s Arboricultural Baseline Note (edp8458_r001) which includes the tree survey information and tree constraints plan. I have now assessed the Baseline Note that was submitted 20.5.25 following my comments from 10.4.25.

The Tree Survey identifies 39 individual trees, 25 groups of trees and 36 hedgerows, totalling 100 features. Of these 100 items, 10 have been categorised as A, of high quality; 22 have been categorised as B, of moderate quality; and 64 have been categorised as C and are of low quality. In addition, four items have been categorised as U and are considered unsuitable for retention.

The hedges are all ‘C’ quality, and mostly comprise of Hawthorn, Blackthorn and Bramble. Other species include Ivy, Ash, Holly. The hedges form important

distinctive structural elements across the site and should be retained and enhanced, including additional species where possible.

The tree groups comprise of native species such as Ash, Oak, Hawthorn, Elm, Field Maple, Willow, most are within neglected hedges and Ash dieback suspected in most cases. Most of the groups are 'C' quality but there are some 'B' quality such as G62, G71.

G83 comprises of Oak and is categorised A1,2,3 and noted as a prominent group in the local landscape. BS5837:2012 states;

Category A3-is given for trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood pasture).

G83 tree group has no remarks against them except their condition being typical of species and age, and they are prominent in the local landscape. As such these trees should be recognised as Veteran trees for the purpose of NPPF 193c and provided with a buffer zone in accordance with the Government Standing Advice.

T83 trees are also located in the proposed ecological buffer zone along the northern site boundary at a minimum width of 5m wide as stated in the Parameter Plan. This stipulation could mean that 5m as fall back is used a lot more than a wider buffer of maximum benefit. I note that P.16 of the DAS at the end of the 'Design Principles' list includes Landscape Buffers to be a minimum of 5m wide. Are the Landscape and Ecological Buffers the same thing? The root protection area for these trees as category A3 should be 15 times the diameter of the tree, which in this case is a 18m buffer zone which extends well beyond the ecological buffer zone and must be accommodated in the site layout and the Government Standing Advice applied.

There are very many Veteran and Notable trees identified by both the Wokingham District Veteran Tree Association (WDTVA), which are also included on the Woodland Trust Ancient Tree Inventory (ATI) of which there are 35 in total.

T30 is recorded on the Ancient Tree Inventory as a Veteran tree – Ref. 163959, but in the Tree Survey is considered a 'Notable' tree rather than a Veteran (for the purposes of NPPF 193c see below;) and given the standard RPA although given the size of the site and to future proof notable trees, T30 should be provided with a buffer zone for a protected tree of 18m.

NPPF 2024 states;

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

c. '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';

There are 7No. individual trees and 1 group of trees, all Oaks, categorised 'A' of which there are 2 trees T30 and T76 which have a 1200mm girth diameter. Using

Dr. Lonsdale chart, Oaks T30 and T76 are Notable - Veteran trees with a girth of 3.769m, and require a buffer zone of 15 times the diameter which for these 2 trees will be 18m – see above.

The following trees are identified as 'U' quality and include T11 (Unknown species), T14 English Oak, T92 Ash, and T95 Oak and will be removed. Partial removal of hedges; H5, H6, H13, H20, H41, H78, H99, and all of G42. Existing trees identified for retention on the Tree Retention and Protection Plan (EDP1) will continue to be managed ? What is the approach for management? Changes will be made as required by the design development, and revised and updated Arboricultural Impact Assessment should be provided as appropriate.

RAVEN2 is not a recognised way of assessing Ancient and Veteran trees. The starting point is generally the Government/ NE PPG Government Standing Advice on Ancient and Veteran Trees which includes Buffer Zones and the presence of site trees on the Ancient Tree Inventory.

As the Framework Plan is still conceptual, and there little detail that can be perceived and so difficult to know how many of the retained trees will be kept through design development. The AIA states that any retained trees affected by the development at detailed design stage will be sensitively worked around to minimise any adverse effects such as ground protection, no dig technologies, hand digging and access facilitation pruning. For trees that have been growing in open ground with unrestricted access to moisture and nutrients, encasing them even partially in development could adversely affect them.

2.0 Revised Development Framework Plan and Illustrative Landscape Masterplan.

Policy TB21 which requires applicants demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment including Landscape quality, strategy and sensitivity, and key issues. Proposals will retain or enhance the condition, character and features that contribute to the landscape.

The site is within Wokingham Borough landscape Character Assessment Area J3 '*Spencers Wood Farmed and Settled Clay*'. In order to maintain the landscape character of the following strategy is required:

...to conserve and enhance the rural character of the agricultural landscape'...

The key aspects to be enhanced and actively managed are the pattern of hedgerows, remnant parkland, trees and avenues, views to the Loddon Valley and west Berkshire, the rural character of the lanes, and the GHQ Stop Line. There are opportunities for woodland planting to integrate the M4, busy roads and expanding urban fringes of Reading, in particular around the expanding settlements of Shinfield, Spencers Wood and Three Mile Cross as part of the South of the M4 SDL. In terms of development, the aim is to conserve the rural character of the landscape and gaps between settlements while maintaining the integrity of settlement identity.

A revised and updated Design and Access Statement Issue 2 11.2.26 includes an 'Illustrative Masterplan' 11.2.26, although I have not seen this drawing separately in the submission.

A revised and updated Arboricultural Impact Assessment has been prepared (but I have not seen this submitted to the Council).

The DAS says that the latest Development Framework Plan has retained all the trees that are included within the ATI database that have been noted 'Notable' or 'Veteran'. However, the applicant is not recognising these items as veteran within their plans or reports as (in their opinion) they do not have the age, size and significant veteran features to be afforded the protection or irreplaceable habitat as set out in the NPPF.

Only tree T30 has been provided with a 15 x stem diameter root protection area but they do not recognise it as a veteran as it is not fitting the matrix applied to the tree survey. I refer back to my comments above with respect to protecting trees now and in the future, in a rural setting in the countryside. There are significant trees across the site and many of them are in locations where it would not be difficult to provide a VT BZ, which can be used as a design as well as protective tool.

The VT BZ will help to inform the design of the northern boundary ecological buffer which is dominated by residential development parcels. The space between the existing and proposed development should be a minimum of the widest root protection area which will also provide scope for public space around the trees and continued access to water and nutrients for the trees to thrive.

The wider buffer zones will also provide significant enhanced visual amenity and landscape enhancements between the existing dwellings to the north and for the proposed residential, where hopefully permeability by way of access routes will help to knit the communities.

North-South landscape buffers are shown dividing the residential parcels, but some of these are not as significant as they should be. It is important to remember that the land is countryside and development should be of a reduced density where landscape is of equal importance to building, but also demonstrate green fingers across development that aid integration.

In the revised DAS there are several comments relating to the SANG:

I observe that the SANG path goes through the RPA of T74 a Veteran tree. This path must be re-routed outside of the RPA.

Additional space for landscape enhancements to a buffer adjacent to the boundary of the SANG with the Solar Park is required which can extend from the residential parcel to the south.

Review the location of the SANG car park and its relationship with the other features, currently it looks disjointed with its surroundings.

Assessment of the latest layout

A principle entrance is opposite Barge Lane, along with commercial and residential development proposed in the southern part of the site which will dramatically change the character of the site which currently preserves the settlement gap between Shinfield and Swallowfield.

The proposals for work units in the southern tip of the site will form a hub of industrial units around a new roundabout at Barge Lane junction with Basingstoke Road.

There is a significant treeline along the northern field boundary to this part of the site. Industrial / commercial units where the building heights are unknown will hide much of this tree line from the view. There is no additional space provided to screen the front of the buildings other than the existing hedgerow. The resulting design will screen views across countryside and change the low key character of this area.

The area residential development adjacent to the solar park has no discernible landscaping to the site edge with the park. It is important that sufficient space is provided for adequate landscaping to provide visual screening to the solar park which is a temporary development, whereas the proposed residential is permanent.

Sports pitches, play areas and POS forms a significant east-west green strip that links with the SANG. North of this strip is a school building and car park set within a large area of open space. North of this space is a curved line of dwellings that back onto the school site and face the SANG. These dwellings are isolated and have no relationship with other dwellings around the site.

There are very many different routes from main vehicle routes to footways, but these are very difficult to identify from the key to the drawing.

There is a local centre and car park to the north, but the layout of the local centre is not integral to the setting and there is no plaza/wide frontage to meet. A care home is located to the north of this space. Landscape features include an allotment and orchard close to Veteran tree T74. These are key features and a key node across the site where a N-S greenway could form a link across the easement Greenway, which although cannot be planted within 6m strip there is space for tree planting along the roads adjacent to it. There is some evidence of this on the plan but there it looks unfinished.

It is not clear how the pedestrian links between the development and the existing community can be realised. The development should have permeability especially via PROW SHIN 33 but currently those connections proposed look aspirational.

The residential development parcels, especially to the north-east look dense and would benefit from an open space in the centre or a greenway linking to the SANG.

Conclusion

Overall the development is an area of dense housing that extends settlement by reducing the settlement gap. The proposals are not integral to the existing

settlement area or a natural extension to it and seem to be a stand alone development where connections are aspirational.

The rural character has not been retained contrary to Policy TB21,

The proposals appear unfinished and are inconsistent, with odd areas of tree planting and no tree planting/landscaping.

Although the trees and hedgerows are retained and protected, there are parts of the hedges that will be removed. The Veteran trees on the site are not recognised as such and only 1 of the Veteran trees is protected with the correct distance of 15 times the diameter which is contrary to Policy CC03 and NPPF 193c.

Updated plans within the DAS are fuzzy and difficult to understand and no separate copies are provided of the Tree Retention and Removal Plan or the Illustrative Masterplan which has no drawing number.

Conditions & Reasons (if required)			
Date:	16.4.25	Signed:	B. Crafer