



Mr N Wilson
Beechwood Tree Care Ltd
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Frances Martin
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18 May 2023

Your contact is: **Andrei Nazare, Planning, Development & Regulatory Services**

Dear Mr Wilson,

RE: PROPOSED WORKS TO ONE FALSE ACACIA TREE AND NINE LIME TREES AT THE GLEN, BOUNDARY LANE, READING - PART OF TREE PRESERVATION ORDER NUMBER 98/05.

Thank you for your application of 25 April 2023, regarding the above.

Further to my visit on 4 May 2023, I have the following comments:

With regards to the False acacia tree, you have concerns with (1) the lack of buttress roots and the possibility that historically its roots were damaged when the area was dug out. You also stated (2) the first major union is severely included and pointed to (3) old pruning wounds on the other two stems which can be potential failure points. (4) The high target area is also noted as context. You applied to reduce the tree into a multi knuckle pollard by forming 3 pollard knuckles at the appropriate branch unions (at approximately 1/2-2/3 of its current height). This is a significant reduction and an entirely different type of management of the tree compared with the way it has been maintained until now, therefore we expect this proposal is supported by clear evidence of the raised issues.

(1) While the ground levels were changed historically, these remained unaltered for at least the last decade as evidenced by the photographs we have on file. During this time the tree withstood a number of severe weather events, including storms which caused many trees to fail throughout the Borough. This demonstrates that whatever ground level works were carried out around it in the past, the tree was either not affected or was able to recover afterwards, as such I do not find this point a valid reason to significantly reduce the tree.

(2) The first major union has potential for bark inclusion but the extent of included bark is difficult to assess given the nature of the bark. You did not provide any evidence

supporting the statement that *'without pruning it is likely that the front stem will fail at the included union'*, except for a general statement that *'Robinias as a species are very prone to included union failures.'* It is accepted that the wood of this species can be brittle and lead to failures in older specimens, particularly if they are declining in health. Whilst concerns over the general health have not been raised in this case the nature of this species and its location, hence target area, are acknowledged and in this case are accepted as reasons justifying the proposed work.

(3) During my visit, I was unable to observe from ground level any concerning *'visible dysfunctional wood'* at old pruning wounds on the two stems growing away from the parking area. Your application does not include any evidence, findings, or photographs to support your statement. As specific evidence relating to this point is not provided, we do not consider it a valid reason to reduce the tree.

(4) The target area was noted during the visit, and is acknowledged under point 2 above.

You have mentioned 3 more reasons why you feel the LPA should approve the proposed works. However, of these 3, reasons 1 and 3 are not arboricultural reasons but are noted and have been taken into consideration. We consider reason 2 (*'tree's vitality is good'*) as a statement supporting maintaining the tree as it is.

In conclusion, whilst we do not agree on all the points you have raised, 'on balance' we consider there is sufficient justification for the proposed pollarding of the tree.

The Lime trees this application relates to were subject to a previous similar tree works application that you submitted in 2021 (ref 211187), on which occasion my colleague Lee Garner refused the proposed works. His reasoning at the time was that the alleged defects were not clearly demonstrated and were not observed during his visit on 6 September 2021. His letter stated that *'if any trees hold such defects that would warrant such extensive works due to safety, principally this would not be unreasonably refused. However, as it stands, observations made with regards to defects isn't specific to any one tree. It is not unreasonable to require noted defects for each tree, the location of the defect within the tree and photos in support. It may even, in some circumstances, be necessary to undertake further investigation of a defect to determine its significance'*.

With regards to the line of Lime trees on the rear boundary (T2-T4 and T7-T12), you have raised a number of concerns, which I will address below. Based on these concerns, listed as reasons for the proposed works, you applied to begin a new high pollard cycle at approximately 6-7m high for T2-T4 and approximately 9m high for T7-T12.

I reiterate the recommendation put forward by my colleague Lee Garner which is that we expect *defects for each tree, the location of the defect within the tree and photos in support* to be provided when significant works are proposed to a group of trees. Some of the concerns raised by you are too general for us to be able to consider as valid reasons to reduce the trees. For example, *'3. several of the trees clearly have decay present at the old pollard points'* and *'4. without pruning it is likely that sections of these trees will fail.'* The above is equally true for concern number 9.

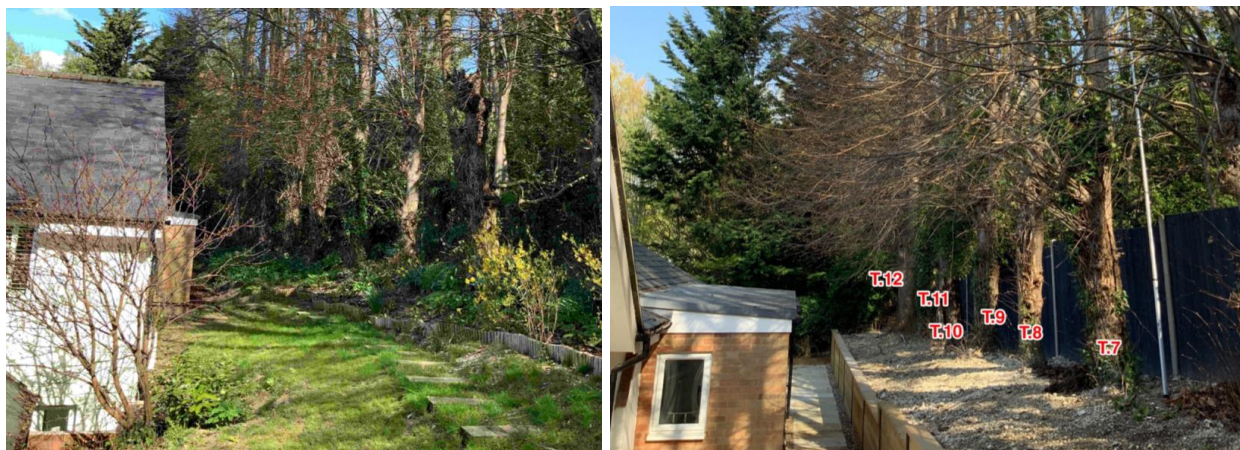
Concerns numbered 1, 2, 3 and 8 are relating to the same matter, which is the

management of historical pollards that have not been maintained as such and are now lapsed pollards.

In line with current best practices (BS3998:2010 section 7.10) where pollard cycles have been allowed to lapse, a crown reduction should be proposed instead. The extent of this reduction should be based on sound arboricultural judgement based on inspection of the trees.

While it is not within my remit to inspect the trees and provide a report on their condition, my brief observations note that there is a difference between, for example, the condition of T3 and those of T4 or T12 - the former showing an included union with visible decaying wood, while the latter two appear healthy with no visible defects. Your report does not identify specific defects or decaying / dysfunctional wood on any one tree, which is not consistent with the observations I made during my visit. As such, you have not provided specific evidence relating to the condition of each tree to support the proposed pollarding as a group.

You state that *'on the house side it is likely there is limited root growth due to the proximity of the building'*. I agree with the *'limited root growth'* part, however, the reason for this is not the proximity of the building, but the works undergone to dig in and erect the retaining wall which was installed since the previous application in 2021. Given the area the works were carried out in is within the Root Protection Area (RPA) of the trees, I assume this was done under arboricultural supervision to ensure that no harm was done to large roots and the stability of the trees was not compromised. In any case, prior to such works within the RPA of protected trees, liaison and agreement with the Natural Environment Team should have taken place as the root severance that must have occurred would have needed approval under the TPO. We have no correspondence about it on file, hence the work has been done at the owner's risk in relation to detrimentally impacting the trees and potential enforcement action. The marked difference can be seen in comparing 2021 photographs with the current situation:





Concerns numbered 5 and 7 relate to the environment and context in which the trees are growing, and both indicate (as with the False acacia above) the trees should be regularly inspected and managed accordingly to the findings of said inspections. It is acknowledged that chalk banks can limit soil rooting depth, however, appropriate reductions of the tree should help alleviate that concern, as well as being appropriate management for lapsed pollards.

You have mentioned 6 more reasons in support of the proposed works, which are noted, albeit the arboricultural justification is the more important consideration.

Considering the above, I do find that you did not provide sufficient specific evidence to support the proposed blanket pollarding works on the Lime trees T2, T4, T7-T12. However, I find it is reasonable to significantly reduce T3 due to its poor included and decaying union. In addition, lesser works are approved for the other Lime trees, as per the conclusion below, to address arboricultural and safety concerns.

I note that four other Lime trees on site have not been mentioned in the list of proposed works (T5, T6 and 2 more on the S-E part of the group). These are in poor condition and have been kept at historic pollarding height. In order to avoid causing larger pruning wounds later on, you should explore the possibility of re-pollarding them on this occasion by discussing it with Mr Prytherch - as well as removing basal growth. Following your conversation with Sarah Hanson on 17 May, this work has been included in this application to avoid the need for a further submission. You expressed some concern about the condition of the trees and whether they would tolerate re-pollarding - I will leave it to you to assess this now that they should be in full leaf, hence their physiological condition will be clearer. Please note that lesser works than pollarding, if you considered it appropriate, would be allowable under this consent.

In conclusion, for the reasons discussed above, the following proposed works are refused:

- 2x Lime trees (T2 and T4 on application) - Form into multi knuckle pollard by forming pollard knuckle at approx. 6-7m at the appropriate branch unions - refused
- 6x Lime trees (T7-T12 on application) - Form into multi knuckle pollard by forming pollard knuckle at approx. 9m at the appropriate branch unions - refused

I can confirm that the following proposed works on one False acacia, five Lime trees and lesser works on eight Lime trees are approved subject to the conditions below and with reference to the annotated photographs:

- 1 x False acacia (T1 on application) - form into multi-knuckle pollard by forming 3 pollard knuckles at the appropriate branch unions, as indicated on submission photograph
- 1x Lime tree (T3 on application) - form into multi knuckle pollard by forming pollard knuckles at approx. 6-7m at the appropriate branch unions
- 8x Lime trees (T2, T4, T7-T12 on application)
 - Remove basal and epicormic growth up to 1m above historic pollarding knuckles (those at approx. 3m above ground level)
 - Reduction on lateral spread on Southern side of overextended branches - back in line with the retaining wall
- 4x Lime trees (T5, T6 and 2 most S-W-ern of the group) - re-pollard to historic pollarding knuckles and remove basal growth

We would welcome a new application for reduction / creation of pollarding points to re-consideration and such an application should be supported by individual inspection of each tree.

During my visit I noted that Ivy is growing on the base of the Lime trees and on some of them it makes the visual inspection of the trunk difficult. It is prudent to sever the Ivy at the base early to avoid it overwhelming the trees and to facilitate easy inspection. See informative 5 below.

Conditions

1. Five days' notice in writing shall be given to the Council prior to undertaking the approved works.

Reason: To ensure that the Local Planning Authority is given sufficient notice of the works to enable the effective monitoring of tree work within the Borough.

2. All tree surgery shall be in accordance with BS 3998: (2010) Tree Work - Recommendations.

Reason: To ensure that all works are carried out in an acceptable arboricultural manner

3. The approved canopy reduction of T1 False acacia and T3 Lime shall be undertaken in mid-late Summer (July - September) when the tree's energy reserves are at their height or during the Winter months of December - January during the period of dormancy.

Reason: Taking into account the tree's phenological cycle and in order to avoid any unnecessary detriment to the tree as a result of the pruning work.

4. Climbing spikes shall not be used whilst undertaking any form of works on living trees, except on trees to be felled.

Reason: Spikes can cause extensive long-term damage

Informatives

1. You are advised that, in accordance with Part 4, 17 (4) of The Town and Country

Planning (Tree Preservation) (England) Regulations 2012, this decision is valid for one pruning operation (as per the approved specifications) to be undertaken within two years from the date of this notice, after which the consent lapses and a new application will be required.

2. Removal of dead or dangerous wood: This does not require the formal consent of the Council. However written notice must be given 5 working days in advance of removing dead wood. Where a branch is deemed to be 'dangerous', i.e. where works are 'urgently necessary to remove an immediate risk of serious harm', you are required to give notice to the Council 'as soon as practicable after the works become necessary'.

3. Disturbance of wildlife: It is an offence under the Wildlife and Countryside Act 1981 (as amended) to disturb roosting bats or nesting birds. It is advisable to consult your tree surgeon/consultant to agree an acceptable time for carrying out any work. Wildlife and habitat controls are administered by Natural England who can be contacted on 0300 030 6000

4. It is best to avoid works in the period immediately before or during bud burst and leaf fall to minimise the effect on the long-term health of the tree

5. Prior to the severing of well-established Ivy at the base of the tree, it would be prudent to carry out an assessment of whether any of the stems of the Ivy are forming a natural brace above a suspected bark-included union

Appeals

If you are aggrieved by the refusal of consent for the proposed pollarding or by any of the conditions attached to your consent, you may appeal to The Planning Inspectorate (PINS). Because of coronavirus (COVID-19), you currently can only make a planning appeal online. You cannot currently apply by post.

For more information go to:

<https://www.gov.uk/government/publications/tree-preservation-order-appeal-form>

Telephone: 0303 444 5500 or e-mail it to:

treeandhedgeappeals@planninginspectorate.gov.uk

Your appeal should be received within one month of receipt of this decision or any such longer period as the Planning Inspectorate may allow.

If you require any further assistance, please do not hesitate to contact me on the above number.

Yours sincerely,

Andrei Nazare

Andrei Nazare

Assistant Natural Environment Officer

C.c. Mr Prytherch, The Glen, Boundary Lane (via e-mail)