

Memo

To: Louise Fuller, Planning

From: Sarah Hanson, Natural Environment Officer, Planning

CC:

Date: 14 May 2025

Re: Consultation on an Application

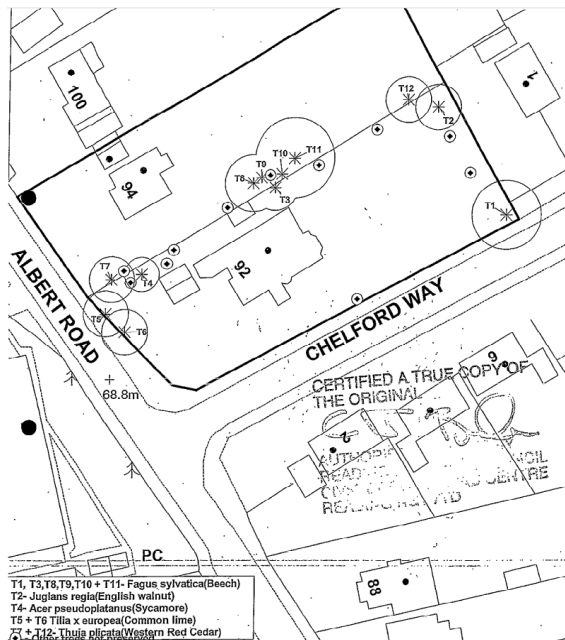
Planning Application Ref: PL/25/0422

Application Type: Full planning permission

Address: 92 Albert Road, Caversham, Reading

Proposal: Erection of detached dwelling

The site is subject to TPO 40/06 which includes a number of trees on and adjacent to the site:

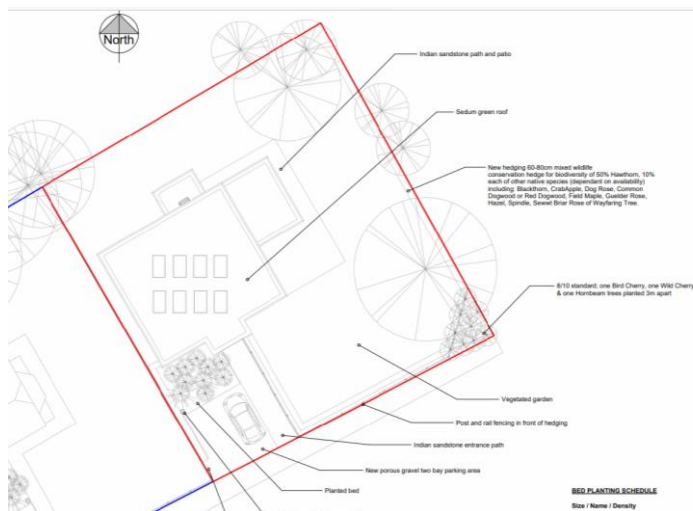


Previous planning proposals on this site have not been successful. Application 240496 (Extension and alterations to flats 1 & 3 to create one additional apartment) was withdrawn. Application 231265 (Erection of 4no.dwellings following demolition of existing

buildings) was refused, with RfR 4 (amenity space provision) & 9 (pressure on trees) relating to tree issues, with plans showing the following:



The current proposal is for a new dwelling in the rear of the existing garden:



With reference to the **Arboricultural Impact Assessment Ref: PB/AIA-25/03.05/Proj_2 dated 17th March 2025 from Tree Surveys:**

I note that that the AIA is based on a tree survey done by the same company on 29 August 2022. The survey should have been updated, being so old, to account for changes (which I know have happened) since then, albeit some changes are noted in 2.4.2.

The plans cited in 1.5.1 are not the current plans submitted with this application.

3.3 cites 3 documents used in production of this report, including '*Tree Preservation Orders: A Guide to the Law and Good Practice*' which was withdrawn in 2014 and also refers to NJUG 10, which was withdrawn and replaced by NJUG 4 in 2007. I don't know why the author would be referring to either, but it is inappropriate to do so.

3.3 refers to the use of BS5837:2012, which is at least current, but it is questionable whether guidance in this has been used.

Section 5 confirms that no tree removal or pruning is required to allow for the proposal.

5.2.2 states:

'The details of any hard landscaping work, including patios, walls and footways, and the excavation and erection of gate posts, were not available at the time of preparing this report'.

This is not acceptable. In order to fully assess the proposal, the full of extent of works must be made known and arboriculturally assessed as recommended in 5.4.2 of BS5837. I note that the **Proposed Site Plan Layout PR11.3-105 D and Landscape Plan PR11.3-106 D** are unhelpful in showing the extent of soft and hard landscaping or boundary treatment to assist with this, as would be expected to be shown.

5.2.3 goes on to say:

'There will be no major impacts on tree root protection areas as a result of this scheme provided that the tree protection barriers and ground protection mitigation are installed as shown on the tree protection plan ref PB/TPP-25/03.05_Proj_2 included in Appendix 2 and maintained in situ until all construction works activity is completed'.

It is unclear how the author can come to this conclusion given the statement in 5.2.2.

5.4.5 then states:

'It is anticipated there will be RPA incursions for the foundations and construction of new hard surfaced paths and patio and excavation and installation of new fence posts. Disturbance to tree roots can be significantly reduced by appropriate mitigation work to be set out in an AMS'.

This justifies the need to include this now, as it is 'anticipated'.

5.5. confirms that the route of services is unknown – again this is important to know to assess the tree impact (ref 8.4 of BS5837). There is an expectation that the connection will be from existing services in Chelford Way hence the route of existing services could have at least been established.

7.1 confirms (twice) that *'The retained trees within the site will continue to increase in size as they reach full maturity'* and that *'it is anticipated that some minor management intervention may be required in keeping with normal arboricultural practice'*

The author does not comment on this any further, other than to state that a tree works application will be required. BS5837:2012 5.3.4 advised that:

'A realistic assessment of the probable impact of any proposed development on the trees and vice versa should take into account the characteristics and condition of the trees, with due allowance and space for their future growth and maintenance requirements'

With point (d) stating:

'Future pressure for removal. The relationship of buildings to large trees can cause apprehension to occupiers or users of nearby buildings or spaces, resulting in pressure for the removal of the trees. Buildings and other structures should be sited allowing

adequate space for a tree's natural development, with due consideration given to its predicted height and canopy spread...

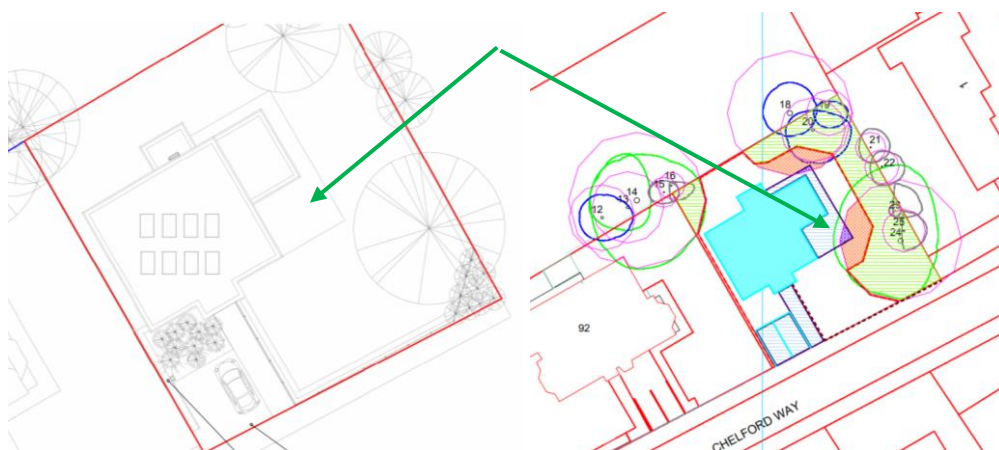
The acknowledgement that the tree(s) will need pruning in the future does not take the above advice into account and indicates that insufficient space has been provided for future growth.

8.1 of the AIA states:

'The retained trees will provide shade over parts of the site late morning to afternoon. Shade is considered beneficial especially in hot weather and we do not anticipate any adverse impacts as a result of these retained trees'

No Tree Constraints Plan has been provided, as would be expected in an AIA, on which shading segments would be included, as recommended in 5.2.2 of BS5837, to assist with this point.

The TPP includes an area of 'Ground protection - No-dig foundations' but it's unclear what is proposed here hence clarity is required:



I note that a 'Tree Root Protection Plan' PR11.3-102 D has been provided by the developer, separate to the AIA/TPP. It is not appropriate and unnecessary to provide this separately as it just confused matters.

Some new planting has been indicated, the details of which could be secured via condition, if approved.

In conclusion, the poor quality of the AIA is not sufficient to demonstrate that the development is acceptable in relation to trees and as such is not supported.

I recommend, and would support (even as a lone RfR) the refusal of this application on tree grounds along the lines of:

The development fails to demonstrate a lack of harm to a protected tree of high amenity value and is, by virtue of the proximity to retained trees, is likely to result in future pressure to prune or fell contrary to Local Plan Policy EN14 and aims of the adopted Tree Strategy (2021).

RfR 4 of 231265 is, I think, also applicable.