

Memo

To: Anthony Scholes, Planning

From: Amy Daly, Assistant Natural Environment Officer, Planning

CC: GS Ecology

Date: 23rd June 2026

Re: Consultation on an Application

Planning Application Ref: PL/26/0349

Application Type: Full planning permission

Address: Land adjacent Tilehurst Railway Station, Oxford Road, Tilehurst, Reading, RG31 6TH

Proposal: 3 storey, 2-bed dwelling house (self-build) including formation of an access to Oxford Road (A329), driveway, landscaping, and associated works

The site is a woodland subject to 'woodland' Tree Preservation Order applicable TPO 126/07 – this protects all trees species on site of all sizes. The site lies along a 'Green Link' (Policy EN12), along the 'treed corridor' of Oxford Road, as defined in our adopted Tree Strategy, and is within an Air Quality Management Area. All these factors result in retention of trees being a high priority here.

Policy EN14 Trees, Hedges and Woodlands, states the following:

Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.

4.2.72 of EN14 states:

Retention, enhancement and extension of woodlands will be achieved in conjunction with relevant development proposals, and may include measures such as new planting and management plans. The effective management of new woodland areas will be promoted, recognising the economic, environmental and social benefits that woodland management and tree planting can provide.

I note the site was refused planning permission in 2015 (application ref:150136), which then was appealed and dismissed (appeal ref: APP/E0345/W/16/3154721). The main issues considered in the appeal, that relate to trees and landscaping, are cited as follows:

- i) The effect of the proposed development on the character of the area with particular regard to protected woodland;*
- ii) The effect of the proposed development on biodiversity and the green network;*

The Inspector in that case concluded that *'the appeal scheme would cause harm to the character of the area, biodiversity and green networks'*. Whilst the proposal in that case was more extensive, the same principles apply.

Further to our visit with GS Ecology of 16th June 2026, and with reference to the ARBORICULTURAL IMPACT ASSESSMENT, PROTECTION PLAN AND METHOD STATEMENT, 10th April 2026, Ref: 84-2117-7/28/2025 1B, I have the following comments:

The proposal will result in the loss of two 'B' category early mature/mature Oak trees, T14 & T28. There will also be a loss of three 'C' category trees including T6 (Hawthorn), T15 (Hazel) and T17 (Ash). One 'U' category tree (T11- Hawthorn) is also proposed for removal. Hence a total of six trees, albeit the conclusion states eight trees (one 'U' category plus seven others). With reference to the PROPOSED SITE PLAN, March 2026, Drawing No. P2503-03, Rev A, I note seven replacement trees are proposed to be replanted. However, the amenity value of mature trees is not simply replaced by replanting. Mature (and early mature) trees are of a larger size hence higher amenity value, so whilst the proposed replanting does increase tree numbers, it does not fully replace the amenity and environmental value lost from the mature trees proposed to be felled.

I note the *'Table 2 – tree works summary'*, identified T28 as a Sycamore, yet in *'APPENDIX A – TREE SCHEDULE'*, T28 is identified as an Oak. I have taken T28 to be an Oak, as I note the tree works have been revised, but the trees surveyed remains the same and this may just be an error from when the document was revised.

I note that the AIA does not include a Tree Survey Plan or Tree Constraints Plan, i.e. plans to show the tree coverage and removals without the development proposals, as would be expected. This is more difficult to see from the Tree Protection Plan (which incidentally is not labelled as such) due to other annotations on the plan. Shading, discussed within the report, can be seen and will be significant.

Whilst an indicative service route is shown on the TPP, the nature of the site means that services, including a drainage strategy, could have further detrimental impacts on the trees hence should have been considered in detail as part of the submissions.

DESIGN & ACCESS STATEMENT, 14th March 2026, states *'The tree removal does not result in a continuous break in the woodland edge, nor does it materially diminish the sense of green enclosure along Oxford Road. Views into the site development would not appear visually intrusive when experienced from the public realm, as the new house is located away from the road and closer to the existing flats.'* However, this is not agreed. The access/entrance point will remove T17 on Oxford Road to facilitate said access, which is a loss a tree along a 'treed corridor'. Whilst T17 is classed as a 'C' category tree

(fairly normal within a woodland where trees are competing), its height is 21m, with a canopy extending 10m north, 16m east & 5m south - its size contributes to the screening of Tilehurst station, and its canopy spread contributes to the canopy cover within the Borough – this screening will not be able to be replaced due to the proposed access, there will be a loss in canopy cover and a break in the treed corridor. This will make the development visible to the public and detract from the amenity value of the woodland.

The extent of hard surfacing within the site, of which is a woodland, is not supported. The driveway is proposed to be constructed of '*angular black basalt gravel*' using a cellular confinement system. The woodland currently consists of undisturbed, naturally soft landscaped, uneven ground. A significant area of the woodland's ground will be replaced with this surfacing, which will detract from the amenity, wildlife and environmental value of the woodland.

I attach an extract from the PROPOSED SITE PLAN, March 2026, Drawing No. P2503-03, Rev A, an extract from Google Maps, and two of my site visit photographs to demonstrate the access and extent of hard surfacing proposed vs the existing site:



Proposed Site Plan vs Google Maps



Site Visit Photographs – existing ground conditions

The AIA discusses shading and land use, in relation to trees, concluding that these will not be an issue. However, it is unlikely that the common nuisance factors associated with trees, including shading, leaf fall, branch breakage, bird droppings, will never be an issue. It is normal for householders to seek to have some part of their garden / amenity space unimpacted by trees (canopy plus shading), which would not be the case here. Policy H10 states:

H10: Private And Communal Outdoor Space

'Dwellings will be provided with functional private or communal open space, including green space wherever possible, that allows for suitable sitting-out areas, children's play areas, home food production, green waste composting, refuse storage, general outdoor storage and drying space. Houses will be provided with private outdoor space whereas flats may be provided with communal outdoor space, balconies and/or roof gardens'.

I would suggest that the woodland nature of the site would conflict with some of the above provisions as a result of conflict with 'natural tree nuisance' issues. This will lead to pressure to remove further trees and/or significant pruning to the further detriment of the woodland.

To conclude, I currently object to the application as it involves the removal of at least five protected trees (plus one in poor condition). Given the woodland nature of the site, trees here are not expected to be individually high quality due to natural competition – whether they are category B or C is therefore irrelevant as removal impacts the woodland regardless. One of the tree removals required is on the frontage of the site, along a 'treed corridor' which also forms a valuable Green Link. The amenity value of mature trees is not replaced by replanting, as mature trees are of a far more significant size. Whilst a net gain in tree numbers is positive, the loss of these existing protected trees isn't supported simply by replacement replanting. In addition, a dwelling and associated hard surfacing prevents natural regeneration over a significant portion of the site; with regeneration being an important factor protected by the 'woodland' type TPO, i.e. this type of TPO protects saplings as they grow. The development will have a detrimental impact to the woodland, both its appearance, its very nature and environmental value. The proposal will set an unwelcome precedent for future development within woodlands, including those protected under TPO legislation. The proximity of the development to the trees within the woodland, will significantly increase the future pressure to prune or remove trees, which are currently in an undisturbed woodland environment. The proposal does not sufficiently positively enhance the woodland and thus does not comply with EN14 or the aims of our adopted Tree Strategy. As such, I would recommend a Reason for Refusal along the following lines (based on the 2015 decision RfR 1):

The proposed development would result in the loss of trees which are covered by a Woodland Tree Preservation Order specifically made as the area of land forms a woodland that makes a positive contribution to the landscape value of the area. It would also result in future pressure to fell or significantly reduce trees in the future, resulting in further negative impact on the woodland. This loss would be detrimental to the 'treed corridor' on this main route and the character of the area contrary to Reading Borough Council Local Plan Policies EN14, H10 and to objectives of the Reading Borough adopted Tree Strategy (2021).