

Memo

To: Gary Miles, Planning

From: Amy Daly, Assistant Natural Environment Officer, Planning

CC:

Date: 4th August 2026

Re: Consultation on an Application

Planning Application Ref: PL/26/0868

Application Type: Householder planning permission

Address: 16 Jefferson Close, Emmer Green, Reading, RG4 8US

Proposal: Erection of new detached garage

The site of 16 Jefferson Close is subject to Tree Preservation Order 73/03. The site is also situated along a Green Link and within an area of recorded protected and priority species. The location of the proposed garage is along a soft, grass verge along the entrance of Jefferson Close, contributing to its street scene.



Google StreetView – 16 Jefferson Close (red arrow); approximate location of proposed garage (blue arrow)

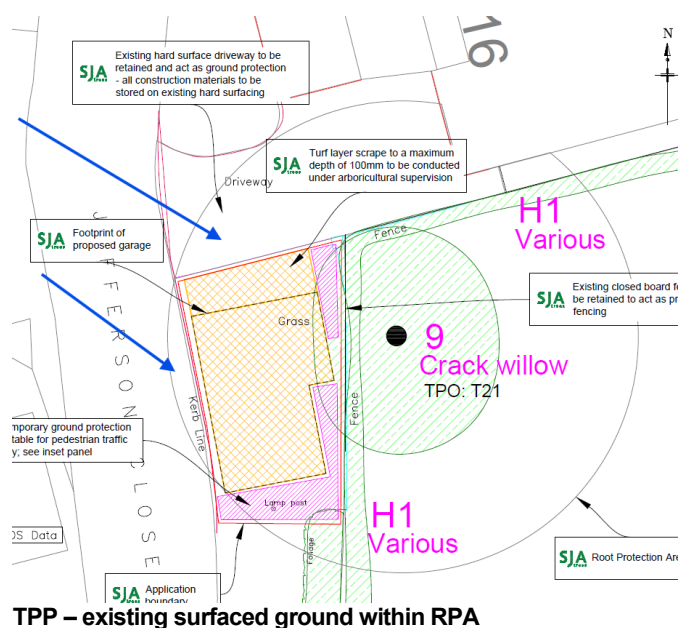
I note the land on which the garage is proposed is under a separate land title to the remainder of 16 Jefferson Close but that the applicant (as per the application form) is the owner of this land.

With reference to the Arboricultural Implications Report (AIR), June 2026, Reference: Ref. SJA air 26097-01, I note the following:

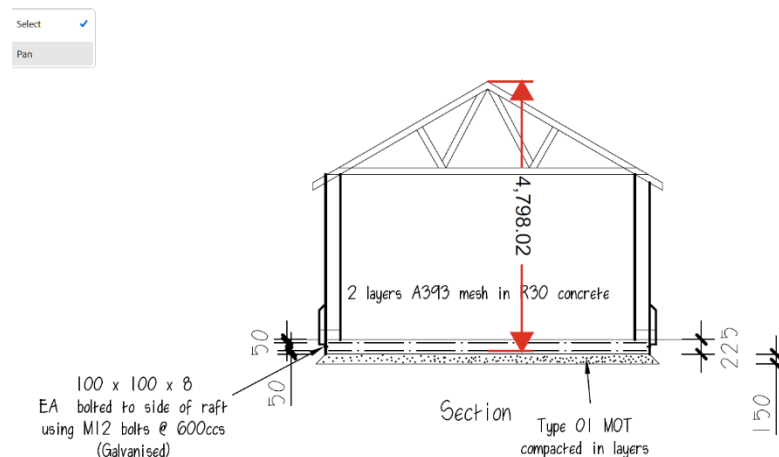
I firstly note that the existing wall, indicated 'to be demolished' on the Proposed Floor and Elevations Plan, has already been removed along with a section of the hedge, as can be seen on the photo on the front page of the AIR. I acknowledge that a new fence has been erected, but it is unclear whether this was constructed in respect to minimising the impact of the tree's rooting system. With any proposal where there is a loss of soft landscaping to facilitate development, it is expected that the impact of the loss of soft landscaping is mitigated, however, this is not possible here within the confines of the applicant's land.

I note that Section 2.3 (Local Planning Policy) makes no reference to the adopted Tree Strategy which does refer to the protection of trees (and refers to the use of British Standards).

Section 6.1.2. states 'Consequently, a tree within the RPA of which no disturbance will occur can be regarded as one that will not suffer any significant or long-lasting harm because of the proposals and will therefore remain "viable". The RPA incursion of the Willow (No.9 of AIR; T21 of TPO) is calculated as 15.2%, Section 2.6.1 states 'As shown in **Table 2** the surface area of the incursion equates to 15.2%, and so does not exceed the 20% maximum incursion into currently unsurfaced ground recommended in BS 5837, and, as will be discussed below, the actual RPA impact will be significantly less than this two-dimensional calculation would suggest'. The RPA has not been adjusted (as per 4.6.2 of BS5873) and both the road and the driveway are included which are not likely to be favourable rooting environments. Whilst I appreciate that the BS5837 does quote the said percentage, it also states in 7.4.2.1 that 'The design should not require excavation into the soil, including through lowering of levels and/or scraping, other than the removal, using hand tools, of any turf layer or other surface vegetation', which the methodology discussed below, does not comply with.



Section 6.2.2. states *'The foundation of the proposed garage will be of a slab design which will be situated on top of the existing ground level. Consequently, ground preparation will consist of the removal of the turf layer and levelling of the minor change in ground level from the fence at the northern extent to the kerb to the south, resulting in excavation no deeper than 100mm. This maximum depth will be isolated to the northern extent of the garage, due to the minor level difference. The extent of excavation gradually reduces in extent from that point down to towards the road, with ultimately only the removal of the turf layer being required.'* As mentioned above, we do not consider this acceptable as the BS5837 advises that ground levelling should not occur within an RPA beyond the turf layer. The Proposed Section Plan below, doesn't seem to show only 100mm of excavation - the plan appears to show 225mm of excavation for the concrete base, and a further 150mm for the Type 01 MOT. Whilst I appreciate there is a *'very minor upward slope (approximately 100mm) from the kerb to the eastern boundary'*, the elevation shows further excavation than that detailed within the AIR. The existing ground level is not labelled in the elevations, which makes this particularly unclear to understand. It would also be useful to include several section diagrams to demonstrate where the existing and proposed ground levels are compared to the garage.



Section Drawing – existing ground level not clear; excavation shown more than 100mm

Section 6.2.3. states *'As there are underground services in the area, piles will not be utilised, further limiting the impact on the RPA. Additionally, over dig during construction will be negligible as there is no need to set the foundation into the ground, which might otherwise necessitate additional workspace, the turf removal and ground levelling will be contained within the area of the foundation.'* I'm unclear what is meant by this when if the foundations were built on piles, this would limit excavation to the piles - the foundations are shown to be set into the ground in the elevation drawings.

Section A.2.5 states *'Any roots encountered of over 25mm diameter will be cut back cleanly to the face of the dig nearest to the tree, using a sharp hand saw or secateurs, and their cut ends covered with hessian to prevent desiccation'*. We do not consider this acceptable as the BS5837 states *'Roots smaller than 25 mm diameter may be pruned back, making a clean cut with a suitable sharp tool (e.g. bypass secateurs or handsaw), except where they occur in clumps. Roots occurring in clumps or of 25 mm diameter and over should be severed only following consultation with an arboriculturist, as such roots*

might be essential to the tree's health and stability'. Therefore, the AIR suggests severing all roots is acceptable, but this does not comply with the BS5837.

Section 6.2.5. states '*Furthermore, as the proposed building is relatively narrow, water will still be able to penetrate to the ground underneath the footprint from the edges; therefore, this area will remain a viable rooting environment, despite the new foundation.*' – no gap between the ground and the base is shown, with soil compaction expected so it is not agreed this will remain as a viable rooting environment. The existing soft ground is proposed to be replaced with compacted Type 01 MOT base and concrete, which will compact the soil and limit water permeability and gaseous exchange.

Section 6.2.6. states '*As a species, crack willow, has been identified as to moderate good at tolerating root pruning and disturbance. As this specimen is of average physiological condition, there is no reason to suggest that it will not be able to tolerate the cutting of a small number of roots within this small section of its RPA.*' I am slightly unclear how it is certain only a small number of roots are required to be severed; however, as above, we don't consider severing roots or clumps of roots over 25mm in diameter as acceptable. It is expected that the garage would be built above ground level, using a foundation type that avoids excavation beyond the turf layer, as it is within an RPA and in accordance with BS5837 guidance mentioned in 7.4.2.1 and quoted above.

Allowing development to be undertaken on a grass verge will impact the street scene, with soft ground and landscaping aiding the visual softening of the developed area. I would suggest that allowing the garage here would set an unwelcome precedent for further 'development' on this strip of land but will leave you to assess this. However, the Willow is a protected tree, and if development is allowed despite the methodology outlined within the AIR which we do not agree with, this may set an unwelcome future precedent for further development within the RPA of both protected and non-protected trees, impacting their health.

To conclude, the application is not currently supported due to the direct impact the proposal will have on the tree's health and amenity value. The excavation and base proposed for the garage is not consistent between the AIR and the proposed plans. The excavation detailed is not one we would consider acceptable within an RPA, where less impactful methods could be used. I recommend the following RfR:

- The proposal fails to demonstrate no harm to a protected tree of high amenity value. As such the proposal is contrary to Local Plan Policy EN14 and to the aims of Reading Borough Council adopted Tree Strategy (2021).