

Dear Liz,

F/22/93194 - THE AGEAS BOWL, MARSHALL DRIVE, WEST END

Arboricultural Documents

Arboricultural Impact Assessment reference TRE/TABS/Rev D

Arboricultural Method Statement reference TRE/TABS/Rev D

Proposed Tree Loss

Policy DM1 states that all new development should “*not involve the loss of or damage to trees...of value to the character of the area...*”. The information in DM1 is expanded on in the Trees and Development Supplementary Planning Document, with Key Points 2 and 3 of relevance:

Key Point 2 – “*...there must be a presumption in favour of retaining existing trees. Any impact on existing trees will be considered not just from an amenity point-of-view, but also with regards to the environmental and climate emergency.*”

Key Point 3 – “*The Council expects applicants to demonstrate that tree retention has been fully considered...only where there is exceptional justification, as evidenced by the applicants, shall tree removals be considered.*”

The benefits derived from a tree are generally proportionate to its canopy size and leaf area. Thus, the larger the tree, the more effective it is in providing the potential aesthetic, biodiversity value and environmental benefits. Retaining and incorporating existing trees within a development will result in greater benefits.

Whilst there are proposed tree removals across the entire site, Character Areas 1 and 2 contain a significant number of losses. This includes high quality mature groups or mini woodlands; large individual specimens; and younger, established landscaping (e.g. to the rear of the existing car park). The loss of trees in this area is substantial and will significantly alter the character of the locality.

The impact of the tree loss cannot be fully appreciated using the Arboricultural Impact Assessment (AIA) alone. The legitimate use of Tree Groups under British Standard 5837:2012 (grouping trees together that display similar attributes) masks the true number of tree losses presented in text, and the associated depletion of canopy cover. For example, G20 extends from the entrance to the Hilton, northwards behind Marshall Drive, and then back eastwards, along a fairway to the south of the properties on Botley Road. The AIA states that part of this group is to be removed but does not quantify the number of individuals that are proposed to be removed.

There is no evidence submitted which demonstrates that tree retention was considered at the earliest point in the design stages (Key Point 3, above). In fact, it does not appear, given the pattern of loss across the site, that trees were considered a significant constraint at all.

It is acknowledged that there is a proposal for a large number of new trees to be planted across the site but retaining and incorporating existing trees within a development means that they are already

established. This results in a lower mortality rate than is typical for designs relying exclusively on new trees and does not require intense and costly post-development management.

Lack of Detail

There are several situations where it has not been demonstrated that trees, which have been marked to be retained and protected, can in fact be successfully incorporated into a completed scheme. Final levels in several locations appear to conflict with the Root Protection Areas and the Tree Protection Fencing. For example: T50 – an A category oak – currently located on a natural bank adjacent to the site boundary, in front of it there is a ditch, which is behind an existing bund of approximately 2m. This area is shown to be protected by the tree protection fencing but is also shown to be leveled (and a pedestrian path routed to the southwest of the tree). The RPA would be significantly impacted by this development, and it is not clear how the Tree Protection Fencing would conflict with the process of cut and fill. This has not been satisfactorily addressed in the Arboricultural Method Statement.

There are numerous other examples, including (but not limited to): the boundary with Telegraph Woods; the northeast of Character Area 5 with the boundary with David Lloyd Tennis Centre; other length of the northwest of Character Area 5; and in and around the proposed care home.

There are also concerns regarding how proposed levels would affect hydrology given the known issues in Telegraph Woods, a SINC; and the relationship between trees – especially in Telegraph Woods – and residential gardens and dwellings.

Finally, we have several minor issues with the proposal, such as agreement on some of the proposed arboricultural work; incorrect or conflicting information; and lack of details regarding construction and mitigation proposals.

Conclusion

We raise an arboricultural objection to the current proposals. Fundamentally, the tree loss proposed is contrary to Policy DM1 and guidance contained within the Trees and Development SPD.

Further, we feel that the arboricultural information presented does not contain enough detail for such an expansive proposal. Whilst it gives an overview of impact and mitigation, it struggles to fully quantify the proposed impacts and fails to demonstrate that the scheme can be brought to fruition without additional impacts being realised.