

Dear Liz,

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

Final comments – January 2024.

Arboricultural Documents

Arboricultural Impact Assessment reference TRE/TABS/Rev N

Arboricultural Method Statement reference TRE/TABS/Rev N

Overall 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, will 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.

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.

The number of trees proposed for removal has fluctuated with the various revisions. We acknowledge that an attempt was made to retain as many trees as possible in the some of the revisions, but the final figure – 69 trees – is considered too great. Further, the latest revision, reintroduces the strongly objected to removal of sections of G28 (not acknowledged in the impact assessment), G20, and several significant individual sweet chestnuts, adjacent to the public realm of Botley Road.

It is also acknowledged that there is a proposal for a large number of new trees to be planted across the site. To theoretically satisfy the Tree Replacement Policy, 121 trees are required according to the impact assessment. We will defer to the Landscape Officer in determining whether this number has been proposed and whether the site can accommodate them.

However, 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. Our position remains that the tree loss is too great, regardless of the proposed new tree planting.

Northwest Boundary and Proposed Footpath Link

Since the first proposed layouts, we have voiced concerns regarding levels, especially in Character Area 5. Whilst we acknowledge that some minor level issues have now been resolved in other Character Areas, we maintain our concerns regarding the northwest boundary of the site, within Character Area 5.

This boundary is complicated by both natural and manmade undulating topography. Within this area, there are several A-category trees, which have been marked to be retained and protected. However, because of the topography and the lack of detail regarding construction in this area, the applicant has not demonstrated that these significant trees can in fact be successfully incorporated into a completed scheme. The potential loss of these trees would be a significant impact.

Final levels in several locations appear to conflict with the root protection areas (RPAs) 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 (with the pedestrian path routed to the southwest of the tree). Leveling of this area and the installation of the footpath could have significantly negative consequences for this tree.

Another example can be seen with T48 – another A category oak – where the access road and parking spaces for plots 39 and 40 are shown in its RPA.

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 fails demonstrate that the scheme can be brought to fruition without additional impacts being realised.