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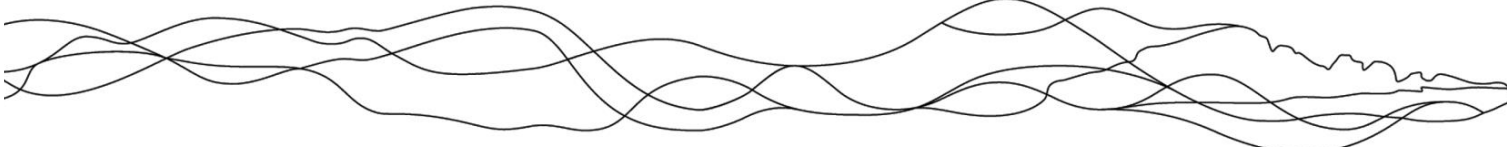
**Scheme: M3 Jn 9 improvements- PCF stage 1 consultation: comment on Environmental Study Report and Technical Appraisal**

**Consultee: Highways England**

**Introduction**

Following from recent meetings with Highways England (HE) and SDNPA members (at which HE have presented to the SDNPA on this subject), I have the following comments to make on the consultation to date, specifically with reference to the arboricultural and woodland ecological details provided thus far, and any potential impact that the scheme might have on these factors

General	Suggested action
<p>The arboricultural resource within, and surrounding, the work site extent that we are being consulted on, contains a variety of individual trees, clumps of trees, hedgerows and woods. Though the work site is dominated by the M3 and A-roads, there are significant features of environmental value, such as the River Itchen SAC and SSSI, priority species and habitats, and the SDNP itself.</p> <p>The wetlands in this area are not only internationally renowned for the quality of the chalk stream and associated habitats, but also for the role they play in remediating flood risk to Winchester City itself- an importance demonstrated in 2014, when the wetland habitat played a crucial role in protecting the city from a potentially significant flood event.</p> <p>The existing tree and woodland cover on the work site, and surrounding it, provides vital visual screening for the roads themselves, but also plays a significant role in acting as a buffer to the significant noise generated by the vehicles on the roads 24 hours a day, and in absorbing significant quantities of pollution at the same time. We should also not ignore the carbon which they also lock up, further helping to offset some of the environmental consequences of the vehicular burning of fossil fuels.</p> <p>Trees are critical- not only for visual amenity value, but also providing habitat, and playing a significant role in flood prevention, and as such the potential impact on trees from this scheme, both during construction and following completion, must be prevented as a first step. If impacts are unavoidable then suitable mitigation and compensation will be required- and as this impacts on a National Park we should not expect like for like, but expect environmental improvement to be the starting point for discussions.</p>	
Arboricultural Assessment	
<p>The methodology being applied to assess the relative quality of the arboricultural resource at this stage is solely based on <b>desk based methods</b>. This means that it is not possible to make any more than the most basic of assessments, and though this is acknowledged in the documents and further ground based survey recommended as the preferred option is being explored, it is not possible to attribute any</p>	<p>A detailed ground based assessment should be carried out of the arboricultural resource at the next stage, not wait until stage 3. This should include a detailed arboricultural impact assessment (including full assessment of the value of the trees and woods- see action below) and arb method statement- which provides detail of exactly how retained trees will be protected. This should all be done in accordance</p>



<p>confidence in the value assessments at this stage. BS5837: 2012 (trees in relation to construction) gives a more effective value assessment, which also includes consideration of cultural and environmental values.</p>	<p>with BS5837: 2012 (trees in relation to construction).</p>
<p>The assessment criteria for 'value' are also only based on the species and approximate condition. It cannot have been possible to accurately assess these factors solely by desk based method and so we should treat any statements on the relative value of the trees and woodlands assessed with extreme caution. This is also not compliant with BS5837 as if undertaken correctly I believe that the majority of trees will likely fall into the 'moderate' category due to the other benefits they provide- and which have not yet been considered. Indeed one of the criteria in the BS for value is the useful life expectancy of the trees- in this case as much of the woodland is younger and more vital in nature it could be argued that the majority of it has a heightened useful life expectancy. Ash dieback is mentioned as a potential factor, but without quantifying the potential magnitude through ground based assessment it is not possible to speculate to what degree this might impact on the useful life expectancy of the woods here.</p>	<p>The value of trees and woodlands on site should be re-assessed at the earliest opportunity, and also be considered in terms of the ecosystems services that they provide, particularly in terms of their value as vital screening of the existing and proposed roads, but also habitat provision and also critically for their role in preventing flooding and for absorbing noise and pollution. Provision for building resilience to pests, diseases and climate change should be an essential feature of any landscaping scheme</p>
<p>From my own site visits it is clear that the arb assessment has missed a number of higher value trees in the immediate work area and close to it, including some that are either veteran or overmature (but which do not appear on the datasets that HE have used so far). It is essential that a more detailed assessment is undertaken to identify these as soon as possible.</p>	<p>More detailed assessment to include suitable provision to identify and protect overmature, veteran and notable trees that might be impacted by the developments, and recommend protection measures in accordance with BS5837. If specimens are unavoidably lost as a result of the development then suitable compensation will need to be agreed with SDNPA, but emphasis should be on avoidance rather than compensation</p>
<p>Woodland loss has been calculated, and due to the reasons outlined above I will avoid using the values given, and focus on the totals. It is essential that due consideration is given to the role that these woods currently play in terms of their ecosystems services, and with a potential increase in road surface area, that they would play once the development is completed.</p> <p><b>Option 11- 10.5ha lost</b>  <b>Option 14- 6.35ha lost</b>  <b>16A- 4.32ha lost</b>  <b>16B- 1.44ha lost</b>  <b>18- 1.8ha lost</b></p>	<p>HE should undertake a more thorough assessment of the relative impacts of each area of woodland loss, particularly in terms of visual and noise screening and flood prevention. This should be cumulative when considered alongside the impacts of other potential developments in the local, such as housing development at Barton Farm, and the combined impacts must be accurately considered and mitigated against- not just treating this scheme in isolation</p>
<p>Compensatory planting has been alluded to, but not detail provided as to where this will be, or what it might be comprised of. If loss of trees and woodland is unavoidable, replacement trees and woods should be provided at a ratio that provides a significant</p>	<p>HE should provide further detail as to where compensatory planting would be located as soon as possible. This should ensure that there is a net gain in planting area. Composition of any compensatory planting should be carefully considered to provide</p>

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<p>additional benefit- i.e. a net gain in area as standard. It is clear that it will not be possible to accommodate this compensatory planting within the scheme boundary, and so early discussions must be held with surrounding landowners for where this planting might be.</p>	<p>the maximum range of ecosystems services- including consideration to habitat creation, visual amenity, noise reduction, absorbing pollution, carbon sequestration, and flood prevention. Planting of specimen/notable trees for the future should also be included in a planting scheme. I would also volunteer that dutch elm disease resistant cultivars of elm should be a feature of a planting scheme- SDNPA would be happy to work with HE on species suggestions if that would be helpful. Due to the limited space within the scheme area for adequate compensatory planting, it will be essential for early dialogue with surrounding landowners, and that this planting is complimentary to other environmental considerations such as chalk grassland, wetlands and reedbeds</p>
<p>It is likely that with the increased heights of the development it will not be possible to adequately screen the development with trees from key viewpoints, not even into the longer term</p>	<p>More thorough assessment of this must be made clear at this early stage, and further consideration to mitigation to be factored in as soon as possible</p>
<p>No detail has been provided as to how retained trees will be protected on site during construction phase</p>	<p>As recommended above HE should provide a detailed arb impact assessment and method statement, in full accordance with BS5837. Once satisfactory detail is provided it should be conditioned. HE should be required to provide an independent monitoring of compliance by a suitably qualified arb consultant</p>
<p>Use of wood in construction- there is clearly limited scope for this, but HE should consider use of wood wherever possible (e.g. sound baffles). Engineering solutions for noise problems should ideally incorporate a hybrid of hard and soft engineering- i.e. trees, bunds, as well as things like sound baffles</p>	<p>HE to consider use of wood where possible, and for this to be sourced from woodlands from the local area- not just wood from local suppliers.</p>
<p>In addition to lack of info on where compensatory planting will be, there also lack of info on how any trees will be established and maintained</p>	<p>Landscaping plans will need to include detail on how trees will be established and maintained for at least the first 10 years.</p>

