

Summary on Ecological impact by the Bristol Tree Forum

Non-Compliance with BCC green infrastructure and conservation planning policy:

In Summary:

- 58 trees to be felled, requiring 165 replacements according to BRTS (does not comply with BCS9 [Green Infrastructure])
- 128 trees to be planted on site - will only recover value in 50-55 years (Does not comply with BCS13 [Climate Change])
- 37 trees to be planted off site but no sites identified (does not comply with DM17 [Existing Green Infrastructure] or Planning Obligations SPD)
- Contribution to S106 of £28,300 (assumes open ground) should be £122,800 (hard standing) as sites not identified
- Does not recognise harmful impact to adjacent Downs SNCI or Strategic Woodland Network (does not comply with DM19 [Nature Conservation] “will not be permitted” and DM15 [Provision of Green Infrastructure])
- Corrected BNG calculation shows a loss of biodiversity of 8.08%.
- None of this is compliant with the Climate or Ecological Emergencies, or the Ecological Emergency Action Plan (putting nature at the centre of all decisions)

In Detail:

Planning policy (BCS9) states that trees should be retained “wherever possible”. The developers have not demonstrated that it is not possible to retain all trees on the site, and therefore this proposal does not comply with BCS9.

Only when loss of trees is unavoidable should developers instead apply planning policy DM17. This policy states that “replacement trees.... should be provided”, in accordance with the Tree Compensation Standard, and the Planning Obligations Supplementary Planning Document (SPD) further requires that replacement sites are identified. There is no policy basis whereby payment into Councils (S106) funds satisfies DM17. As it is unlikely that the offsite trees can be replaced within the required area, and no sites have been identified, this proposal does not satisfy DM17.

The cost of the replacement trees is also defined in the Planning Obligations SPD. The application assumes that replacement planting will be in open ground, at a cost of £765.21 per tree. However, as no sites have been identified, the assumption should be that replacement planting will be in hard standing, at a cost of £3318.88 per tree. As such the payment into S106 should be £122,798 rather than the £28,312 that the developer has offered.

The site is adjacent to a Site of Nature Conservation Interest (SNCI) and part of the West of England Nature Recovery Network Woodland network. As such there is an expectation that the development should improve connectivity to existing Strategic Green Infrastructure Networks (DM15). Therefore, with the net loss of trees on site, this proposal does not comply with DM15.

Similarly, DM19 states that any application which has a ‘*harmful impact on the nature conservation value will not be permitted.*’ Because of the location alongside the SNCI and within the Woodland Network this proposal does not comply with DM19.

Non-compliance with Biodiversity net gain requirements:

It is a current requirement that any development achieves Biodiversity Net Gain (BNG) of no less than zero, with an aspiration of a 10% net gain. The developers erroneously claim a BNG of 43.03%. There are a number of arithmetic and methodological errors in the developer's calculations.

The developers have attributed the site habitats to be of Low Strategic Significance. However, as the site is adjacent to the SNCI which form part of the Bristol Wildlife Network and lies within the West of England Nature Recovery Network Woodland network, this site should be given a status of at least Medium Strategic Significance.

The developers wrongly give a figure of 0.35 Ha of new on-site urban tree habitat comprising 128 small trees. The correct figure for this is 0.0127 Ha. The fact that some trees may reach an eventual Medium to Large size is irrelevant when creating new habitat.

The total habitat units (HUs) created in Table 6 of the report is incorrect. The column adds up to 5.03 HUs not 7.75 HUs.

Four existing ornamental hedges are identified with a combined length of about 77 metres. These should be, but are not, included on the applicant's baseline calculation.

A three-year delay in starting habitat creation should be, but is not, included to allow for the construction period.

Having corrected the methodological and arithmetic errors in the BNG calculations, the actual figure shows a **net loss in biodiversity of 8.08% which is contrary to planning policy.**