



20/01655/F - City Gateway proposal at the former railway depot near Clange Road, Bristol



Our additional comments

The following comments are in response to the amended development plan from the applicant and to further survey work we have undertaken using an adapted [survey model](#) based on [i-Tree Canopy](#).

Using Google Earth images made in June 2017 (the best-quality images from around this period), we have undertaken three random point surveys of the site - <https://bristoltrees.space/trees/i-Tree/canopy.xq?areacode=BTF-003&mode=view> - and determined that, at that time, the site had tree canopy cover (TCC) of 43.31%.¹

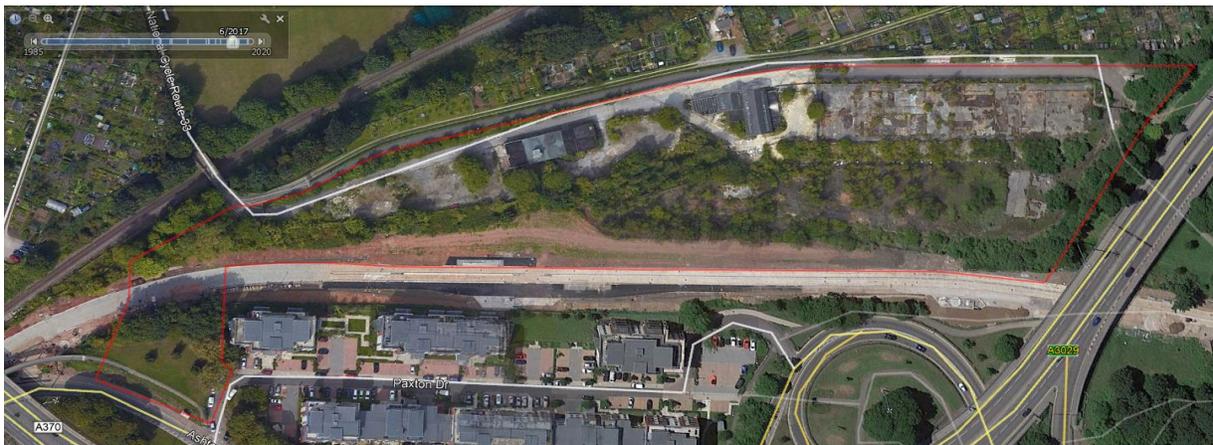


Figure 1: Google Earth aerial image made in June 2017 with the development boundary superimposed.

¹ 95% Confidence Interval - 39.9% to 46.7%



The site has subsequently been partially cleared, which has reduced the site TCC to 35.25%.²

We have undertaken a Biodiversity Net Gain calculation (BDNG) using [Biodiversity Metric 2.0](#) (BDM) calculator published by Natural England.

The proposed development site has an area of 2.59 hectares. 43.31% of this gives a TCC of 1.12 hectares. We have categorised this habitat as BDM *Urban - Woodland* with medium distinctiveness, a moderate habitat condition and medium ecological connectivity. The site is within an area formally identified in the local strategy. On this basis the trees on the site provide 11.33 habitat units (HUs).

The remainder of the site can be categorised as BDM *Developed land; sealed surface* and has zero biodiversity value.

Analysis of the published plans shows that nearly all the onsite tree cover will be removed as a consequence of the proposed development.

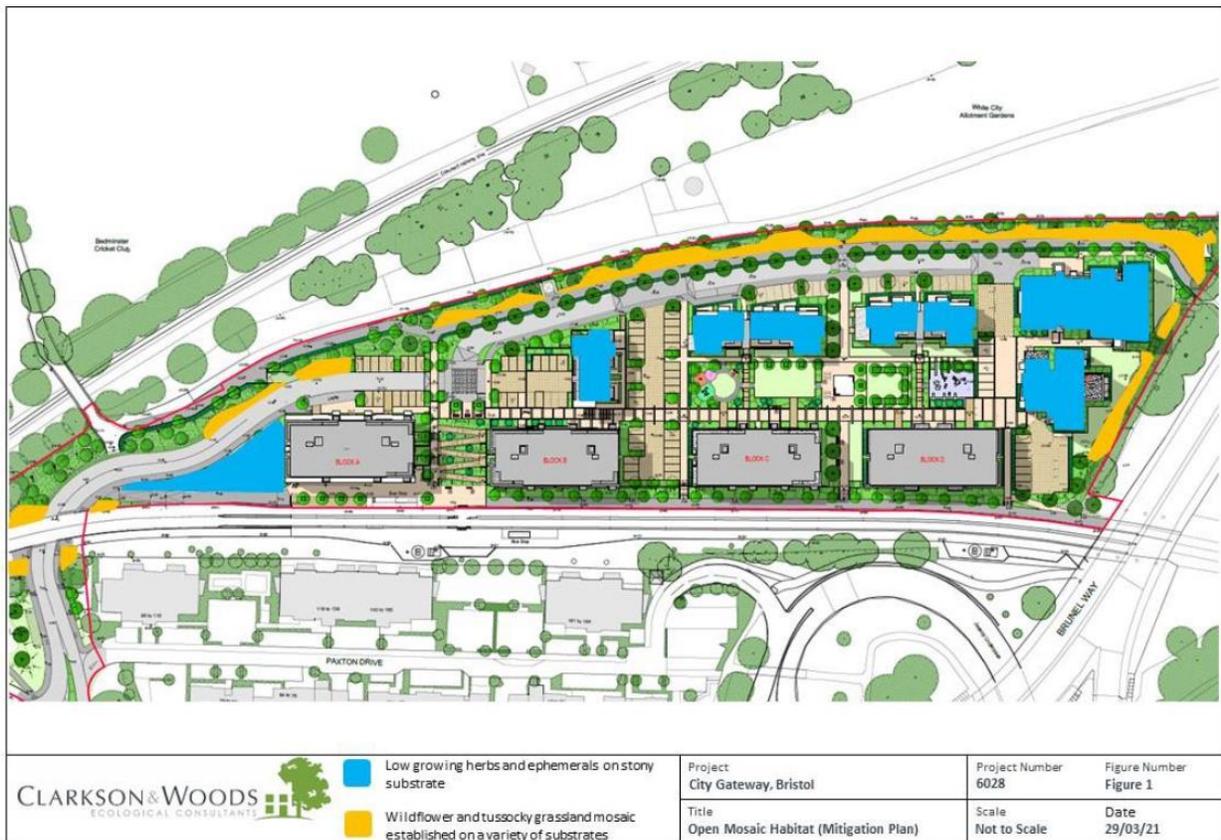


Figure 1: Location of Open Mosaic Habitat Mitigation

The applicant has published a summary of its own BDNG calculation in its Addendum Ecology Letter Report - City Gateway, Bristol dated 29 March 2021.³ We have requested a copy of the

² 95% Confidence Interval 30.6% to 39.9%

³ 20_01655_F-ADDENDUM_ECOLOGY_LETTER_REPORT_CLARKSON_WOODS-2913965.pdf



calculation but have yet to receive it. This shows a net loss of Habitat Units (-0.02)⁴, though the applicant’s ecologist says that ‘Overall the changes to the layout are considered to further enhance the scheme in terms of habitat provision and overall ecological mitigation.’ The degree to which this will happen is not stated.

On-site baseline	<i>Habitat units</i>	9.61
	<i>Hedgerow units</i>	0.15
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation, enhancement & succession)</small>	<i>Habitat units</i>	9.59
	<i>Hedgerow units</i>	2.92
	<i>River units</i>	0.00
Off-site baseline	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation, enhancement & succession)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention/creation)</small>	<i>Habitat units</i>	-0.02
	<i>Hedgerow units</i>	2.77
	<i>River units</i>	0.00
Total net % change <small>(including all on-site & off-site habitat creation + retained habitats)</small>	<i>Habitat units</i>	-0.20%
	<i>Hedgerow units</i>	1824.18%
	<i>River units</i>	0.00%

Figure 2: Updated Biodiversity Net Gain Calculations

Under the [Environment Bill 2020](#) - currently at its Report stage in the House of Commons - a statutory obligation will (if enacted as published) impose an obligation for all new developments to provide a 10% biodiversity net gain as part the approved plan.

Bristol City council has declared both climate and environmental emergencies and has committed to improving the city’s biodiversity.

We submit that this 10% target is the minimum Net Gain percentage that the planning authority should require, whether or not the Environment Bill becomes law. As currently proposed, this development fails to do this and so should be refused.

Bristol Tree Forum

April 2021

⁴ Habitat and Hedgerow Units may not be aggregated.