



Bristol Tree Forum: Planning Applications: 4. BCC's Planning Policies

We are going to take a look at Bristol's Planning Policies with regard to trees.

This will include the Bristol Tree Replacement Policy (BTRS).

I do not want to reproduce here paragraphs and pages of what you can readily find on line. I'll put in the really important ones often referred to, and you might want to "alert".

Houses beat trees hands down sadly. It is the trees (our green lungs) we (you and the BTF) fight for. There are policies which say that existing trees should be retained in development and new tree planting incorporated, but this does not always happen, so we can mention them in our comments/objections.

If you really get involved in this you might find yourselves making statements to, even addressing, Development Control Committees of BCC when the argument about a large development has come down to "houses or trees". We argue that it can be both with some imaginative planning. You will not be asked or expected to do this alone.

I am sorry to say that a bit of reading around within these documents will be required of you to find your way around them, if you either want to use them yourselves when making a comment, or find them referred to in comments made by others, and wonder what it is all about.

I'll put the links here so that you get them "live". You can then either bookmark them once you have them correctly in your system or dispose of them as you will!

These policies are constantly being modified - either locally, or at the direction of HMG. Usually (no promises) we alert our tree spies with a Blog on the BTF website.

You can find these documents handily listed for you on a Bristol Council page:

<https://www.bristol.gov.uk/planning-and-building-regulations/local-plan>

It is unlikely in the extreme that you will find yourself fighting alone using these policies to support your arguments. More likely that if it gets this far you will have alerted the BTF and your local Councillors to something to do with trees that you have spotted, and you think requires greater and wider consideration. But then you will want to know what people are talking about and using.



Bristol Development Framework Core Strategy

[https://www.bristol.gov.uk/documents/20182/34540/Core+Strategy+WEB+PDF+\(low+res+with+links\)_0.pdf](https://www.bristol.gov.uk/documents/20182/34540/Core+Strategy+WEB+PDF+(low+res+with+links)_0.pdf)

BCS 9: Green Infrastructure: page 74

[https://www.bristol.gov.uk/documents/20182/34540/Core+Strategy+WEB+PDF+\(low+res+with+links\)_0.pdf](https://www.bristol.gov.uk/documents/20182/34540/Core+Strategy+WEB+PDF+(low+res+with+links)_0.pdf)

Policy BCS9 The integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced. Opportunities to extend the coverage and connectivity of the existing strategic green infrastructure network should be taken. Individual green assets should be retained wherever possible and integrated into new development. Loss of green infrastructure will only be acceptable where it is allowed for as part of an adopted Development Plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy. Appropriate mitigation of the lost green infrastructure assets will be required. Development should incorporate new and/or enhanced green infrastructure of an appropriate type, standard and size. Where on-site provision of green infrastructure is not possible, contributions will be sought to make appropriate provision for green infrastructure off site.

Policy Delivery The impact of new development on green infrastructure assets will be assessed as part of the development management process. Development management will also secure the retention of green assets in development proposals and the incorporation of new green infrastructure assets. The Site Allocations & Development Management DPD will include supporting policies setting out the detailed approach to green infrastructure assets. This will include standards to determine the appropriate provision of open space and other green infrastructure assets. A supplementary planning document will be prepared to provide further guidance on the implementation of green infrastructure policies in the Bristol Development Framework. It will provide information on approaches to mitigation and to the inclusion of green infrastructure in development. It will also include a typology for green infrastructure.



Site Allocations and Development Management Policies (!!)

https://www.bristol.gov.uk/documents/20182/34540/BD5605%20Site%20Allocations_MAIN_text%20V8_0.pdf/46c75ec0-634e-4f78-a00f-7f6c3cb68398

Green Infrastructure Policies Pages 30 - 46. DM 15 to DM 22.

(The index is not “live” but the Page Numbering box at the top of the document is “live”, so you can move about within the document using that.)

An important paragraph in this document is:

“Trees: The provision of additional and/or improved management of existing trees will be expected as part of the landscape treatment of new development.

The design, size, species and placement of trees provided as part of the landscape treatment will be expected to take practicable opportunities to:

- i. Connect the development site to the Strategic Green Infrastructure Network, and/or Bristol Wildlife Network; and*
- ii. Assist in reducing or mitigating run-off and flood risk on the development site; and*
- iii. Assist in providing shade and shelter to address urban cooling; and*
- iv. Create a strong framework of street trees to enclose or mitigate the visual impact of a development.*

and:

“Trees

2.15.12 Many tree species absorb gaseous pollutants and also capture particulate matter. Therefore where development might have a negative impact upon or be affected by poor air quality, additional tree planting of an appropriate species can assist in mitigating air quality issues.

2.15.13 When the correct species are provided a strong framework of street trees or linear connections can assist in creating or strengthening existing wildlife corridors. Where a development site is on or adjacent to part of the Bristol Wildlife Network, the design and placement of any trees should enhance or create wildlife corridors between known habitats. The Bristol Wildlife Network is available to view on the Explore Bristol section of the council’s website:

<http://www.bristol.gov.uk/explore-bristol>.

2.15.14 Where trees are to be provided off-site to mitigate the impact of development on air quality, flood risk or visual amenity, planning obligations will be secured to provide the trees under the approach contained in the council’s Planning Obligations Supplementary Planning Document.”



Let us move on to the [Council's Planning Obligations Supplementary Planning Document](#).

In this policy is the Bristol Tree Replacement Standard (BTRS)

(This is the Policy you will most often refer to in your local effort to keep Bristol tree'd.

Set out in the earlier documents have been the aspirations to retain trees when developing a space that contains trees. One has to hope that the City's planners are already on the case - but that might not happen. Also Developers have a habit of changing things around a bit during the alterations that follow on from their original plans. A tree that was going to be there suddenly disappears. (I have written an article on this for our 2020 Newsletter. It is called "Artists Impressions").

<https://www.bristol.gov.uk/documents/20182/34520/SPD%20Final%20Doc%20Dec2012.pdf/da75908-50fd-4138-afed-770310a6a431>

The index is "live" on this one, and in the Index clicking on page 20, will take you to Trees.

Not a word is wasted on Pages 20 and 21. It contains the now nationwide famous policy - the Bristol Tree Replacement Standard (BTRS). I am not going to reproduce it here - it is well written in the document.

It was a former Chair of the Bristol Tree Forum and a former senior Tree Officer Planning BCC who formulated this Policy.

Developers will do anything they can to try to avoid this obligation. They will chop down trees well in advance of making an Application to develop a site. They will offer to squeeze tiny little cherry trees around the perimeter of a site (all the land that remains) to replace a mighty oak 150 years old when felled, in order to save money, or even put in a hedge of privet and call that "mitigation".

If you spot this policy being abused by a local Application, alert the BTF.

The BTF (it has taken 3 years) has managed to get some agreement from BCC Planning in implementing this Policy to:

<https://bristoltreeforum.org/2019/10/02/changes-agreed-to-bristol-tree-replacement-standard/>

- 1) View an interval of one year between the felling of trees on a site and the Application to develop the site as still to trigger the BTRS.
- 2) Not permit the planting of a hedge as mitigation for felling trees - other than a large hedge, as mitigation for tree loss, to screen an unsightly "industrial" development from public view.



Implementation of the BTRS sadly does not increase tree canopy cover of the City because the tree(s) planted are only replacing trees that are felled. But it is so much better than watching the City gradually being denuded of trees.

- **Just a note to avoid any misunderstanding:** The BTRS only applies to mitigating tree loss when trees are lost from a site that is being developed - and these trees are lost in order to facilitate that development. Trees lost for other reasons in other circumstances (other than TPO trees) do not have a law, statute or planning obligation requiring the Applicant to replace the tree (s). One can prick their conscience with a polite comment, but nothing else.
- It has also become apparent to us over recent years - and this is a huge hole in Tree Regulation/Planning - the BTRS does NOT apply when the development leading to the loss of trees is being done under “Permitted Development”.

In a later Tutorial (Module 7) I’ll explain how you can help to see that the money that Developers pay to the Council to mitigate for tree loss in your area gets spent in your area replacing lost Street Trees.

Again this is not increasing tree canopy cover because 1) A Street Tree has been lost - hence the vacant site, then 2) A Tree or Trees has/have been lost from a site for a building to go up instead and then 3) a Tree or Trees is/are planted as mitigation for those losses.

Yes there may be more than one tree planted if it was a large tree that was felled (see the BTRS Table) but it takes a long time for a new tree to replace a large old tree in terms of replacing the loss to the environment that has happened.

If you are interested, our sister site Trees of Bristol, has a calculator you can use to demonstrate this.

<https://bristoltrees.space/trees/tree-benefits/interactive.xq>