



Bristol Tree Forum - Further comments

21/01331/F - Caravan Club, Cumberland Road, Bristol BS1 6XG - *Erection of residential dwellings (166), commercial floorspace, integrated car and bicycle parking, refuse storage, landscaping and associated infrastructure and services.*

These comments are in addition to our earlier comments published on 1 May 2021 and are made bearing in mind that the applicant has still failed to produce its Biodiversity Metric calculation. We have asked for the applicant's Biodiversity Metric Calculation, but this has yet to be produced.

It is also made in light of the recent publication of Biodiversity Metric 3.0¹ (BM3.0) which was published on 7 July 2021 and of the newly published version of the National Planning Policy Framework² (NPPF).

The Bristol Tree Forum continues to object to this application as currently formulated. Our reasons remain the same. In summary this is because planning policy BCS9 states that individual green assets should be retained wherever possible and integrated into new developments. This has not been done, despite the developer being directly owned by the council, and therefore especially responsible for setting an example by following its own local planning policies.

Also, the Environment Bill 2020, currently on its passage through parliament, proposes an amendment to the Town & Country Planning Act 1990 to insert a new section 90A as follows:

Overview

1 (1) This Schedule makes provision for grants of planning permission in England to be subject to a condition to secure that the biodiversity gain objective is met.

(2) Paragraphs 2 to 12 have effect for the purposes of this Schedule.

Biodiversity gain objective

2 (1) The biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.

(2) The biodiversity value attributable to the development is the total of—

(a) the post-development biodiversity value of the onsite habitat,

(b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and

(c) the biodiversity value of any biodiversity credits purchased for the development.

¹ <http://publications.naturalengland.org.uk/publication/6049804846366720>

² <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



(3) The relevant percentage is 10%...

We have already discussed our BM2.0³ calculation in our initial comments using the little information that the applicant has so far produced, but it is clear that, as currently cast, the biodiversity net gain proposals do not achieve even neutral net gain (which the local planning authority currently accepts), let alone the 10% net gain envisaged by the Environment Bill.

Here are the Headline Results using BM2.0:

On-site baseline	<i>Habitat units</i>	4.96
	<i>Hedgerow units</i>	0.61
	<i>River units</i>	0.00
On-site post-intervention (Including habitat retention, creation, enhancement & succession)	<i>Habitat units</i>	0.61
	<i>Hedgerow units</i>	0.00
	<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 (Including habitat retention, creation, enhancement & succession)	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change (including all on-site & off-site habitat retention/creation)	<i>Habitat units</i>	-4.35
	<i>Hedgerow units</i>	-0.61
	<i>River units</i>	0.00
Total net % change (including all on-site & off-site habitat creation + retained habitats)	<i>Habitat units</i>	-87.76%
	<i>Hedgerow units</i>	-100.00%
	<i>River units</i>	0.00%

Here is the Headline Results using BM3.0:

On-site baseline	<i>Habitat units</i>	4.63
	<i>Hedgerow units</i>	0.55
	<i>River units</i>	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	0.55
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	-88.03%
	<i>Hedgerow units</i>	0.00%
	<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 (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	2.80
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-1.28
	<i>Hedgerow units</i>	-0.55
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus (including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-27.61%
	<i>Hedgerow units</i>	-100.00%
	<i>River units</i>	0.00%

³ <http://publications.naturalengland.org.uk/publication/5850908674228224>



In both cases, it is also notable that both the Habitat Units and the Hedgerow Units still show a negative Net Gain even though, in the case of BM3.0, we have factored in the replacement of trees lost onsite with offsite planting as per the Bristol Tree Replacement Standard (BTRS).

Our BM3.0 calculation uses the new urban habitat category, *Urban Tree* and is based on there being 91 medium-sized trees growing on site of which 17 trees will be retained and the remaining 72 will be removed.

We have also assumed that, after a delay of three years, the applicant will plant a further 31 medium-sized trees on site and that, under BTRS, a further 179 new, medium-sized trees to be planted off site. The BTRS replacements will be planted inside LPA and be sufficiently local to the site of biodiversity loss.

We have applied the three-year delay to allow for any construction period following the removal of trees and the need for new tree planting to be in the winter months.

Our calculations will be adjusted when we know what further habitat creation or enhancement the applicant plans.

Copies of both our calculations are available on request.

Use Biodiversity Metric 3.0

Bristol City Council has advised that, where a planning application is pending and a Biodiversity Metric calculation has been undertaken under BM2.0, there is no need to submit a new calculation using BM3.0. However, given the calculations below and that the Council is in fact the applicant through its directly owned developer, Goram Homes, and that it has declared Environmental and Climate Emergencies, we invite the developer to submit a new BM3.0 calculation in any event.

The National Planning Policy Framework, July 2021

The newest version of the NPPF now makes it clear (paragraph 131) that:

Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

In our view, this application fails to comply with this new policy guidance because it fails to:

- Ensure that existing trees are retained wherever possible.
- Ensure that the trees proposed to be planted will make an important contribution to the character and quality of Bristol's urban environment.



- Address Bristol's declared Environmental and Climate Emergencies.
- Help to mitigate climate change.

Bristol Tree Forum

23 July 2021