



22/01221/F | Proposed development of the site including, internal and external alterations of Listed House building and conversion of lodges fronting Westbury Park; demolition of buildings and the erection of new buildings to provide an integrated Retirement Community (Class C2) for older people; together with landscaping, car parking, refuse and other associated works (major). | St Christopher's School Westbury Park Bristol BS6 7JE

Summary (25 April 2022)

1. The city has declared climate and ecological emergencies and pledged to become carbon neutral by 2030 and double tree canopy cover by 2046. But all this is meaningless unless we take every opportunity we can to deal with these emergencies and achieve these pledges - now, and in specific ways.
2. It is not good enough to assert that the need for more housing takes precedence over all else. The National Planning Policy Framework is clear that the importance of green Infrastructure as one of three overarching, interdependent objectives - economic, social and environmental - has equal status to the other two objectives. Furthermore, there is no reason why developments cannot incorporate existing trees as BCS9 requires.
3. The applicant has failed to demonstrate that it has considered the Mitigation Hierarchy: Avoid, Minimise, Remediate, Compensate. This provides a cascading decision-making process in which only if the preceding choice is unavailable is the next one considered.
4. Likewise, no attempt appears to have been made to comply with BCS9 - Green Infrastructure, which states that '*Individual green assets should be retained wherever possible and integrated into new development.*' In this context "*possible*" does not mean what is expedient to the development.
5. Instead, the applicant has moved straight on to the provisions of DM17: Development Involving Existing Green Infrastructure, which allow for replacement trees to be provided '*where tree loss or damage is essential to allow for appropriate development*', even though they have not shown that the removal of trees is indeed '*essential*'.
6. Where tree removal is "*essential*", DM17 states "replacement trees of an appropriate species should be provided". There is no policy basis for satisfying DM17 simply by contributing monetary compensation in the form of Section 106 payment. Trees should be replaced in accordance with the replacement rate laid out in the Planning Obligations SPD. As such replacement sites must be identified in accordance with the Planning Obligations SPD, which states that tree sites will be '*identified through the planning approval process.*'
7. BCS13: Climate Change states that '*development should adapt to climate change through measures including: ...the use of green infrastructure to minimise and mitigate the heating of the urban environment.*' Clearly the removal of 58 trees, with all the ecological and environmental benefits that they provide not being recovered for decades, is not in compliance with BCS13.
8. There is little evidence that DM15: Green Infrastructure Provision has been considered or applied, in particular there is an expectation that a development should improve



connectivity to existing Strategic Green Infrastructure Networks.

9. Even if the removal of trees were shown to be *'essential'* and *'compensate'* was the only option left after the previous requirements of the Mitigation Hierarchy have been exhausted, there is no realistic prospect that any of the trees lost will ever be replaced offsite. As a result, these proposals fail because they do not comply with planning policies, in particular with DM17.
10. The site is also within the West of England Nature Recovery Network Woodland network (model)¹ and so falls within the ambit of DM19 which makes it clear that development which has a *'harmful impact on the nature conservation value'* of the adjacent SNCI and the Woodland Network, *'will not be permitted.'*
11. All these factors have an impact on the Biodiversity Net Gain calculation which we discuss below. Quite apart from the arithmetic and other errors we have identified, the applicant has failed to give sufficient weight to the strategic importance of the site or properly measured the true extent of the Urban Tree habitat. They have also omitted the baseline hedgerow habitat and failed to take the opportunity to factor in new Urban Tree habitat offsite as well as failing to account for the likely delay between the development being started and new habitat being created.
12. When their errors are corrected, their calculation shows a biodiversity net loss of 8.08%.

The planning context - see Appendix 1.

Bristol Tree Replacement Scheme (BTRS) Analysis

DM17: Development Involving Existing Green Infrastructure states that 'Where tree loss or damage is essential to allow for appropriate development, replacement trees of an appropriate species should be provided'. The mechanism for achieving this is called the Bristol Tree Replacement Standard (BTRS).

In our view, the obligation imposed by DM17 to provide *'replacement trees of an appropriate species'* falls wholly on the applicant. DM17 states that tree sites will be *'identified through the planning approval process'* so this obligation cannot be considered discharged unless the applicant has identified all the suitable new planting sites required. Merely entering into a S106 agreement to pay for the trees to be planted does not discharge the applicant's obligations under DM17.

The AIA identifies 121 trees on site of which 39 are in tree groups. The applicant proposes removing 58 to include 18 trees in the tree groups. We calculate that under BTRS, this will require 165 replacement trees to be planted (see **Appendix 3**). The applicant proposes planting 128 trees on site which means that new sites will need to

¹ <https://awt.maps.arcgis.com/apps/webappviewer/index.html?id=5cc11efcac3e448aa7e9ef2067b571a1>



be found offsite to plant 37 trees. Table 1 gives a breakdown of the cost of planting 37 replacement trees offsite.

BTRS Tree Planting Costings			
Replacement Trees (Select Standards)	BTRS		
	165		
	Planned Onsite Planting	128	
Net Offsite Planting	37		
Offsite BTRS Planting	£ / Tree	Tree Nos.	Cost
Tree in Open Ground	£765.21	37	£28,312.77
Tree in Hard Standing	£ 3,318.88	37	£122,798.56

Table 1 BTRS plantation cost calculation

If the per tree cost is indexed to February 2022 this will increase to £996.83 for trees planted in open ground and £4,323.46 for trees planted in hard standing. Given the lack of available open ground sites, it is likely that most new sites will have to be found in areas of hard standing. Thus, if no sites are identified, at the very least compensation must be charged at the higher rate of £122,798.56 (indexed).

Whilst we estimate that there are only 26 tree planting sites currently available within a mile of St Christopher’s,² they are all sites where a tree once grew. This means that planting in these sites would not replace what will be lost because of this proposal; there will be no net increase in tree cover overall, even if all the other outstanding S106 agreements also ‘competing’ for these sites are ignored. The developer’s proposal to mitigate the loss of these trees by planting new trees offsite is therefore unviable and unrealistic because there are insufficient alternative new sites currently available.

Also, the site is located just within the border of Area Committee One, which decides on S106 expenditure on sites within its area, so the choice of possible sites is likely to be further limited to just those within Area Committee One.

Our Biodiversity Net Gain analysis

Under Biodiversity Metric 3.0 (BM 3.0)³, the habitat area of an Urban Tree is assigned to one of three Root Protection Area (RPA) sizes (Table 2).

²

https://bristoltrees.space/trees/home.xq?_path=search/tree&state=Available%20for%20Sponsorship&range=1609&latitude=51.476940&longitude=-2.613686

³ BNG 3.1 has just been issued - <http://publications.naturalengland.org.uk/publication/6049804846366720>



TABLE 7-2: Urban tree size by girth and their area equivalent

Size	Diameter at Breast Height (cm)	Stem Diameter (cm)	RPA (radius in metres)	Area equivalent (ha)	No. of Trees equivalent to 1 ha
Small	30cm	10cm	1.2m	0.0005 ha	2,000 trees
Medium	90cm	30cm	3.6m	0.0041 ha	244 trees
Large	150cm	50cm	6 m	0.113	89 trees

Table 2 Table 7-2 from the Biodiversity Metric 3.0 User Guide

However, no guidance is given how to assign any given tree to these categories⁴. We use the MS Excel[®] formula: =IF(RPA<20 cm,"Small", IF(RPA>=40 cm,"Large","Medium")). On this basis and using the data contained in the applicant’s Arboricultural Impact Assessment⁵ (AIA), we calculate that the habitat area of the 121 Urban Trees growing on this site cover an area of 0.9265 hectares. Table 3 breaks this down as follows:

Size	Count	Actual RPA (ha)	Metric Area (ha)	% Discount
Small	18	0.0159	0.0081	49%
Medium	34	0.0816	0.1384	-70%
Large	69	1.0167	0.7800	23%
	121	1.1142	0.9265	16.8%

Table 3 Urban Tree habitat areas by size

This is nearly 17% less than the actual total calculated RPA of the trees on the site. We calculate that the combined tree canopy cover of these trees is 0.5185 hectares, 26% of the site.

58 of the trees on the site will be removed. These have a habitat area of 0.3301 hectares leaving 0.5964 hectares or urban tree habitat to be retained.

Biodiversity Net Gain evidence has finally been produced to support this applicant - a report produced by Ethos Environmental Planning dated February 2022. Using this, we have been able to reproduce their calculation subject to the following observations:

⁴ We have commented on this - <https://bristoltreeforum.org/2021/07/25/valuing-our-urban-trees/>

⁵ 22_01221_F-ARBORICULTURAL_IMPACT_ASSESSMENT-3162696 - dated 18 February 2022.



1. The Applicant has calculated the baseline habitat area of the Urban Tree habitat at 0.46 hectares but gives no explanation of how they arrive at this figure. They do not report what area of this habitat (or indeed, of any habitat) will be retained.
2. We do not agree that the habitats on this site have *Low Strategic Significance*. As the Biodiversity Net Gain Results report observes, '*the site is adjacent to the Clifton and Durdham Downs Site of Nature Conservation Interest (SNCI). This SNCI and Wildlife Corridor form part of the Bristol Wildlife Network and as such Policy DM19 in the Bristol Local Plan (adopted 2011) applies.*' Given its extensive, largely native, canopy cover (around 26%), the site is effectively part of this wildlife corridor. The site is also within the West of England Nature Recovery Network Woodland network (model). We have assigned *Medium Strategic Significance* to all habitats.
3. We have also factored in a three-year delay in starting habitat creation to allow for the construction period.
4. We have adjusted the Urban Tree habitat creation from 0.35 hectares to 0.0127 hectares as this is the correct habitat area allowed for planting 128 Small new trees on site. The fact that some may reach an eventual Medium to Large size is irrelevant when creating this new habitat.
5. We have calculated that under the Bristol tree Replacement Scheme (BTRS) a further 37 trees will have to be planted off site. We have assumed that these will be Small-sized Standards and allowed for 0.0167 hectares to be created off site. We have used the same parameters as those used for the onsite habitat creation and allowed for a three-year delay and set the spatial risk to *Compensation inside LPA or NCA, or deemed to be sufficiently local, to site of biodiversity loss*. This will create 0.46 habitat units.
6. The total habitat units (HUs) created in Table 6 or the report is incorrect. The column adds up to 5.03 HUs not 7.75 as Ethos reports. The habitat areas created total 2.59 hectares, not 2.24.
7. Four ornamental hedges are identified in the AIA. We estimate that they have a combined length of about 77 metres. These are not included on the applicant's calculation. We have factored them into our baseline calculations.
8. As we have observed, no retained baseline habitat areas are provided. However, setting aside those habitats whose areas are additional to the ground-based habitats - Urban Trees and the Green roofs - the other habitats cover 1.99 hectares which is the declared size of the whole site. This suggests that no baseline habitats (save for Urban Trees) will be retained.

Subject to the above we have adopted the other habitats and parameters used in the applicant's BM 3.0 calculation. A summary of our calculations is set out in **Appendix 2**.

Even on the basis of the applicant's own analysis (but factoring in the arithmetical area errors), we calculate that the current proposals show a loss of 0.39 baseline habitat units, a net loss of 7.16% of biodiversity.



On-site baseline	Habitat units	5.42
	Hedgerow units	0.00
	River units	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	5.03
	Hedgerow units	5.32
	River units	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	-7.16%
	Hedgerow units	100.00%
	River units	0.00%
Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	-0.39
	Hedgerow units	5.32
	River units	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	-7.16%
	Hedgerow units	100.00%
	River units	0.00%
Trading rules Satisfied?	No - Check Trading Summary	

Table 1 Applicant's BNG 3.0 calculation corrected

If we adjust the calculation based on our observations above, then our calculation of baseline biodiversity shows a loss of 0.81 habitat units, a net loss of 8.08% of biodiversity.

St Christopher's Square		Return to results menu
Headline Results		
On-site baseline	Habitat units	10.07
	Hedgerow units	0.08
	River units	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	9.20
	Hedgerow units	5.26
	River units	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	-8.58%
	Hedgerow units	6110.25%
	River units	0.00%
Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	0.05
	Hedgerow units	0.00
	River units	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	-0.81
	Hedgerow units	5.18
	River units	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	-8.08%
	Hedgerow units	6110.25%
	River units	0.00%
Trading rules Satisfied?	No - Check Trading Summary	

Table 2 BTF BNG 3.0 calculation



Appendix 1 - The planning context

The National Planning Policy Framework (the Framework), the Mitigation Hierarchy and Bristol's core planning policies, BCS9 - Green Infrastructure, DM15: Green Infrastructure Provision and DM17 Development Involving Existing Green Infrastructure - the local policies upon which the goals of the Framework may be achieved - are set out below. This is the case whether the relevant sections of the Environment Act 2021 (EA 2021) have been enabled by the time this application is decided or not.

1. The National Planning Policy Framework

This Framework seeks to ensure that new development is sustainable. It stresses the importance of green Infrastructure as one of three overarching, interdependent objectives - economic, social and environmental. This means that sustainable environmental development is no less important than the economic and social development objectives.

The whole emphasis of the environmental objective has become much more imperative with the publication of the latest version of the Framework last July. It now reads:

an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The status of habitat and biodiversity has also been given greater emphasis. Paragraph 181 c) now makes it clear that:

development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

2. Biodiversity Net Gain

With the recent publication of Biodiversity Metric 3.0⁶ (BM3.0), a new way of measuring and accounting for biodiversity losses and gains resulting from development or land management change has been adopted. The biodiversity metric defines Net Gain as an:

... approach to development that aims to leave the natural environment in a measurably better state than beforehand. This means protecting existing habitats and ensuring that lost or degraded environmental features are compensated for by restoring or creating environmental features that are of greater value to wildlife and people. It does not change the fact that losses should be avoided where possible, a key part of adhering to a core environmental planning principle called

⁶ <http://publications.naturalengland.org.uk/publication/6049804846366720>



the mitigation hierarchy.

When the EA 2021 takes effect most planning applications will be required to achieve at least a 10% net gain of a site's baseline biodiversity.

3. The Mitigation Hierarchy

The hierarchy means that mitigation options regarding potential damage to biodiversity should be applied iteratively in order of preference, where any adverse environmental effects should firstly be avoided, then minimised, mitigated, and only as a last resort, with clear justification, compensated for; but enhancement must be secured wherever possible.⁷ See also the British Standard for Biodiversity (BS 42020: 2013)⁸.

4. Local planning policies

Local Planning Authorities have a duty to consider both the protection and planting Green Infrastructure when considering planning applications. The potential impact of development on biodiversity is therefore a material consideration. These are the key planning policies which relate to this application.⁹

a. BCS9 - Green Infrastructure

BCS9 states that 'Individual green assets should be retained wherever possible and integrated into new development.'

When considering any planning proposal, the planning authority must ensure that:

- 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 are taken.
- individual green assets are retained wherever possible and integrated into new development.
- appropriate mitigation of the lost green infrastructure assets is 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.

b. BCS13 - Climate Change

Development should contribute to both mitigating and adapting to climate change, and to meeting targets to reduce carbon dioxide emissions...

⁷ <https://www.rtpi.org.uk/media/1563/biodiversityinplanningpracticeadvice2019.pdf> page 20.

⁸ BS 42020:2013 British standard for Biodiversity - Code of Practice for Planning and development. (BSI, 2013)

⁹

[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).



Development should adapt to climate change through measures including:

- Site layouts and approaches to design and construction which provide resilience to climate change.
- Measures to conserve water supplies and minimise the risk and impact of flooding.
- The use of green infrastructure to minimise and mitigate the heating of the urban environment.
- Avoiding responses to climate impacts which lead to increases in energy use and carbon dioxide emissions.

These measures should be integrated into the design of new development.

New development should demonstrate through Sustainability Statements how it would contribute to mitigating and adapting to climate change and to meeting targets to reduce carbon dioxide emissions by means of the above measures.

c. DM15: Green Infrastructure Provision

The provision of additional and/or improved management of biodiversity will be expected as part of the landscape treatment of new development. The design, size and placement of habitats provided as part of the landscape treatment will be expected to take practicable opportunities to:

- connect the development site to the Strategic Green Infrastructure Network, and/or Bristol Wildlife Network
- assist in reducing or mitigating run-off and flood risk on the development site
- assist in providing shade and shelter to address urban cooling
- create a strong framework of street trees to enclose or mitigate the visual impact of a development.

d. DM17: Development Involving Existing Green Infrastructure

DM17 also recognises the importance of habitats which are considered valuable multifunctional green infrastructure assets - and makes provision for their preservation and replacement.

e. Policy DM19: Development and Nature Conservation

Bristol contains a wide range of important nature conservation sites that contribute to a varied stock of natural habitats and species. The city has two sites of international importance. One is the Avon Gorge SAC.

DM19 makes it clear that Development which would be likely to have any impact upon habitat, species or features, which contribute to nature conservation in Bristol will be expected to:

- i. Be informed by an appropriate survey and assessment of impacts; and
- ii. Be designed and sited, in so far as practicably and viably possible, to avoid any



harm to identified habitats, species and features of importance; and

- iii. iii. Take opportunities to connect any identified on-site habitats, species or features to nearby corridors in the Wildlife Network.

Where loss of nature conservation value would arise development will be expected to provide mitigation on-site and where this is not possible provide mitigation off-site. Development on or adjacent to sites of nature conservation value will be expected to enhance the site's nature conservation value through the design and placement of any green infrastructure provided.

The proposed development is also on an SNCI. DM19 makes it clear that development which would have a harmful impact on the nature conservation value of a Site of Nature Conservation Interest will not be permitted.



Appendix 2

Baseline Calculation

Baseline Habitat												
Broad Habitat	Habitat	Area (ha)	Distinctiveness	Score	Condition	Score	Strategic significance	Score				Habitat Units
Grassland	Modified grassland	0.69	Low	2	Poor	1	Medium Strategic Significance	1.1				1.52
Heathland and Scrub	Bramble scrub	0.01	Medium	4	Poor	1	Medium Strategic Significance	1.1				0.04
Urban	Urban Tree	0.93	Medium	4	Moderate	2	Medium Strategic Significance	1.1				8.15
Urban	Developed land; sealed surface	1.12	V.Low	0	N/A - Other	0	Medium Strategic Significance	1.1				0.00
Urban	Introduced shrub	0.08	Low	2	Poor	1	Medium Strategic Significance	1.1				0.18
Urban	Allotments	0.08	Low	2	Poor	1	Medium Strategic Significance	1.1				0.18
	Total	2.91										10.07



Habitat Created

Onsite Habitat Creation												
Broad Habitat	Habitat	Area (ha)	Distinctiveness	Score	Condition	Score	Strategic significance	Score	Delay in starting habitat creation/ years	Final time to target multiplier	Difficulty multiplier applied	Habitat Units
Urban	Developed land; sealed surface	1.22	V.Low	0	N/A - Other	0	Medium Strategic Significance	1.1	3	0.899	0.67	0.00
Grassland	Modified grassland	0.12	Low	2	Poor	1	Medium Strategic Significance	1.1	3	0.867	1.00	0.23
Grassland	Other neutral grassland	0.15	Medium	4	Poor	1	Medium Strategic Significance	1.1	3	0.837	1.00	0.55
Grassland	Other neutral grassland	0.03	Medium	4	Moderate	2	Medium Strategic Significance	1.1	3	0.752	1.00	0.20
Grassland	Other neutral grassland	0.06	Medium	4	Moderate	2	Medium Strategic Significance	1.1	3	0.752	1.00	0.40
Heathland and Scrub	Mixed scrub	0.09	Medium	4	Moderate	2	Medium Strategic Significance	1.1	3	0.752	1.00	0.60
Lakes	Pond (non- priority habitat)	0.01	Medium	4	Moderate	2	Medium Strategic Significance	1.1	3	0.808	1.00	0.07
Heathland and Scrub	Introduced shrub	0.31	Low	2	Poor	1	Medium Strategic Significance	1.1	3	0.867	1.00	0.59
Urban	Intensive green roof	0.22	Medium	4	Good	3	Medium Strategic Significance	1.1	3	0.629	0.67	1.22
Urban	Extensive green roof	0.03	Low	2	Poor	1	Medium Strategic Significance	1.1	3	0.867	1.00	0.06
Urban	Urban Tree	0.01	Medium	4	Moderate	2	Medium Strategic Significance	1.1	3	0.343	1.00	0.04
	Total	2.25										3.95
									HUs Retained		5.25	
									Total Hus		9.20	



Offsite Habitat Creation

Offsite Habitat Creation												Total HUs	7.20
Broad Habitat	Habitat	Area (ha)	Distinctiveness	Score	Condition	Score	Strategic significance	Score	Delay in starting habitat creation/ years	Final time to target multiplier	Difficulty multiplier applied & Spatial Risk Multiplier	Habitat Units	
Urban	Urban Tree	0.02	Medium	4	Moderate	2	Medium Strategic Significance	1.1	3	0.343	1	0.05	

Hedgerow Baseline Habitat and Hedgerow Creation

Baseline Hedgerow Habitat												
Number	Habitat	Length (km)	Distinctiveness	Score	Condition	Score	Strategic significance	Score				Units
1	Hedge Ornamental Non Native	0.08	Low	1	Poor	1	Medium Strategic Significance	1.1				0.08
Hedgerow Habitat created												
Number	Habitat	Length (km)	Distinctiveness	Score	Condition	Score	Strategic significance	Score	Delay in starting habitat creation/ years	Final time to target multiplier	Difficulty multiplier applied	Units
1	Native Hedgerow (H1)	1.36	Low	2	Good	3	Medium Strategic Significance	1.1	3	0.586	1	5.26



Appendix 3 - BTRS calculation breakdown

Tree ID	Tree Category	Tree Count	Trees Removed	DBH (cm)	BTRS Tree Replacements
Totals		121	58		165
T1	C1	1	1	22	2
T2	B1	1	1	17	1
T3	B1	1	1	5	0
T5	C1	1	1	31	3
T10	C1	1	1	40	4
T11	A2	1	1	73	7
T12	B2	1	1	20	2
T18	A2	1	1	57	5
T20	B2	1	1	32	3
T21	B2	1	1	50	5
T22	B1	1	1	49	4
T23	B1	1	1	31	3
T24	B1	1	1	44	4
T26	B3	1	1	42	4
T27	C1	1	1	24	2
T31	C1	1	1	20	2
T32	B1	1	1	50	5
T33	C1	1	1	15	1
T34	C1	1	1	44	4
T35	C1	1	1	27	2
T36	C1	1	1	19	1
T38	B1	1	1	35	3
T39	B1	1	1	17	1
T42	B1	1	1	22	2
T43	C1	1	1	18	1
T44	C2	1	1	42	4
T45	C1	1	1	10	0
T46	C1	1	1	6	0
T47	C1	1	1	10	0
T52	A2	1	2	72	14
T64	C1	1	1	15	1
T65	A1	1	1	89	8
T71	B1	1	1	30	3
T72	C1	1	1	25	2
T78	B1	1	1	25	2
T79	C1	1	1	25	2



Tree ID	Tree Category	Tree Count	Trees Removed	DBH (cm)	BTRS Tree Replacements
T80	B1	1	1	38	3
T81	C1	1	1	15	1
T82	C1	1	1	10	0
G2	C2	4	4	45	16
G7	C2	2	2	70	14
G8	C2	12	12	24	24