



22/03387/F | Erection of two storey (plus roof plant) Elective Centre building and associated works. | Southmead Hospital Southmead Road Bristol BS10 5NB

Bristol Tree Forum - Comments

Save for the comments below, we do not take issue with the arboricultural and biodiversity net gain elements of this application.

Bristol Tree Replacement Scheme (BTRS)

The Applicant’s Arboricultural Impact Assessment (AIA) consists of one a one-page drawing (22_03387_F-ARBORICULTURAL_IMPACT_ASSESSMENT-3254832). This does not comply with the requirements of BS5837. However, the AIA and their Arboricultural Method Statement (AMS) (22_03387_F-ARBORICULTURAL_METHOD_STATEMENT-3277347) has sufficient information to allow us to calculate that of the 49 trees surveyed, 28 are growing within the development boundary.

Of these, it is proposed that three trees will be removed - T8, T19 and T21. Trees T8 and T19 are categorised as B.1 under BS5837. T21 is categorised as ‘U’. On this basis, the two B.1 category trees will need to be replaced in accordance with BTRS with six new trees.

Biodiversity Net Gain

The applicant’s Biodiversity Net Gain calculation (BNG 3.1) (CRM.1876.002.EC.R.002 - BNG.xlsm) has categorised the trees growing on the development site as a linear habitat - Line of Trees (Ecologically Valuable) - 0.2 kilometres long. This is incorrect.

Paragraph 7.4 of the BNG 3.1 makes it clear that ‘*The biodiversity metric 3.1 considers Urban trees to include individual street trees, linear blocks and perimeter blocks of trees within the urban setting. Their definitions are explained in Table 7-1 ...*’

TABLE 7-1: Urban tree definitions

Urban tree categories	
Individual trees	Young trees over 75mm in diameter measured at 1.5m from ground level and individual semi-mature and mature trees of significant stature and size that dominate their surroundings, whose canopies are not touching but that are near other Urban trees.
Perimeter blocks	Groups or stands of trees within and around boundaries of land, former field boundary trees incorporated into developments, individual trees whose canopies overlap continuously.
Linear blocks	Lines of trees along urban streets, highways, railways and canals whose canopies overlap continuously.
<p><i>Note: it is important these categories are applied in an urban environment only. For example, a line of trees along a canal or road would not mean automatic classification as a linear block of Urban trees, as these features may also fit the definition of a ‘line of trees’ within the linear module of the metric. The surveyor should take into account the degree of ‘urbanisation’ of habitats around the tree and assign the best fit for the particular situation.</i></p>	



These trees are clearly growing in an urban setting and so must be treated as an Urban tree habitat.

Using the tree survey in the AMS, we calculate that the baseline habitat area of the 28 trees growing within the development area is 0.2493 hectares of which 0.2253 hectares will be retained. We have assessed the tree habitat as being in **Good** condition - they meet five of the six Urban tree condition criteria set out in the Biodiversity Metric 3.1 - Technical Supplement (18.05.22). We have assigned them as having the same strategic significance as the other habitats surveyed - *Area/compensation not in local strategy/ no local strategy*.

On this basis, these trees provide 3.29 habitat units to the baseline calculation of which 0.32 habitat units will be lost.

The Trading Rules

The Trading Rules for Urban tree habitats state:

The mitigation hierarchy and trading rules apply to Urban trees. Given Urban trees are a 'Medium' distinctiveness habitat trading rules stipulate that the same broad habitat type (or a higher distinctiveness habitat) is required. However, given the important ecosystem services value provided by trees, where possible 'like for like' compensation is the preferred approach (i.e. where possible any loss of Urban trees should be replaced by Urban trees - rather than other urban habitats).

Accordingly, these lost Urban tree habitat units ought to be replaced 'like for like'. In order to satisfy this requirement, we calculate that **26 BS:3936-1 Standard-sized** trees will need to be planted to achieve a habitat area of 0.1058 hectares of Small-sized trees in Poor condition after 10 Year time-to-target period has elapsed. This will satisfy the trading rule requirements.

As no proposals appear to have been made for onsite tree planting (nor is there likely to be sufficient space), we have assumed that the trees required will need to be planted offsite. We have made our calculations on the basis that the compensation required will be 'inside LPA or NCA, or deemed to be sufficiently local, to site of biodiversity loss' and that the site chosen will be in a 'Location ecologically desirable but not in local strategy.' We have set the temporal risk multiplier at zero which gives a final time to target period on 10 years.

The applicant will need to resolve this issue with the planning authority prior to planning consent being granted. We suggest that the six replacement trees required under BTRS be included in this total.

The applicant will also need to prepare a nature conservation and landscape management plan which addresses features of interest, objectives, management compartments and prescriptions, a work schedule including a ten year annual work plan, resourcing including a financial budget and ecological monitoring. This should cover the 10 year time to target period.

On this basis, we calculate that the applicant's proposals will achieve a biodiversity net gain on **38.27%** for area habitats and a **100%** net gain for linear habitats. This is less than the 161.81% area habitat gain the applicant has calculated but more than the 73.05% linear habitat gain they have calculated. It does however exceed the biodiversity net gain percentage currently required by the planning authority or the 10% net gain anticipated under the Environment Act 2021.

The Headline Results of our calculations are set out below. A copy of our BNG 3.1 calculation has been provided to the planning authority.



Monks Park House

Headline Results

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On-site baseline	<i>Habitat units</i>	4.30
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	5.62
	<i>Hedgerow units</i>	0.67
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	30.70%
	<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 <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.33
	<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 & enhancement)</small>	<i>Habitat units</i>	1.65
	<i>Hedgerow units</i>	0.67
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	38.27%
	<i>Hedgerow units</i>	100.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	Yes ✓	

Bristol Tree Forum
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