



22/05998/F | Plot 3 Temple Quay Bristol BS1 6EA

Comments

We **object** to this application as currently presented. Our objections relate both to the arboricultural and biodiversity evidence presented in support of this application.

The applicant has failed to account for the trees that once grew on the site, but which have recently been removed. This means that they have not produced the tree replacement calculation required under SADMP DM17¹. It also means that their BNG 4.0 is flawed because it fails to take account of the baseline habitat value of these lost trees. As a result, we calculate that there will be a net loss of biodiversity of **-27.76%**, not the 368.62% that the applicant calculates.

Given that incorrect information has been provided and the importance of the trees on the site have been ignored, this application should not be allowed to proceed further until correct figures are provided by the applicant. Our objections are as follows:

1. The arboricultural evidence

The applicant relies on an arboricultural assessment (AIA) dated December 2022.² This is based on a survey undertaken on 10 August 2022. Nine trees were surveyed, two of which, T2 & T3 were outside the proposed development boundary. The remaining seven trees, T1 and T4 - T9 are located within the development boundary, though T6 is not identified on the plans published with the AIA.

All these trees have, since the survey, been removed to facilitate the development and, under SADMP DM17, 21 replacement trees are required to be planted in compensation for their removal. The applicant has failed to comment on this. Here is our calculation:

| <i>Totals</i> | | <i>7</i> | <i>7</i> | | <i>21</i> |
|----------------|----------------------|-------------------|----------------------|-----------------|------------------------------|
| <i>Tree ID</i> | <i>Tree Category</i> | <i>Tree Count</i> | <i>Trees Removed</i> | <i>DBH (cm)</i> | <i>Trees x Trees Removed</i> |
| T1 | B (i) | 1 | 1 | 54 | 5 |
| T2 | A (ii) | 0 | 0 | 73 | 0 |
| T3 | A (ii) | 0 | 0 | 68 | 0 |
| T4 | B (i) | 1 | 1 | 58 | 5 |
| T5 | B (i) | 1 | 1 | 34 | 3 |
| T6 | C (i) | 1 | 1 | 33 | 3 |
| T7 | B (ii) | 1 | 1 | 26 | 2 |
| T8 | B (ii) | 1 | 1 | 36 | 3 |
| T9 | C (ii) | 1 | 1 | 13 | 0 |

¹ <https://www.bristol.gov.uk/files/documents/2235-site-allocations-bd5605/file> - page 36.

² 22_05998_F-ARBORICULTURAL_ASSESSMENT_REV_E__RPT._NO._11100_-3367759



The evidence presented by the applicant states variously that:

- 32 trees will be planted onsite,³
- 41 trees will be planted onsite,⁴ or
- that 85 trees will be planted onsite.⁵

Under all of these scenarios, it would appear that the tree replacement requirements of DM17 will be met, though we question if the site is large enough to allow for so many trees to be planted in a sustainable way.

2. The biodiversity evidence

The applicant has presented its Biodiversity Metric calculation using BNG 4.0. Save for the matters set out below, we do not take issue with the calculation. We note that the applicant has set a target of at least 10% biodiversity net gain and have made our own calculations on this basis.

a) The site size

The AIA and the Biodiversity Net Gain report⁶ states that the site is 0.54 hectares, yet the BNG 4.0 calculation shows a habitat area of 0.69 hectares. We have discounted the habitat area of both the baseline and created *Developed land; sealed surface* habitats by 0.15 hectares to correct this anomaly.

b) Individual tree habitat is missing

The applicant has omitted to include the seven *Individual trees - Urban tree* habitats which existed on the site before the trees were removed in its BNG 4.0 calculation. The BNG 4.0 User Guide states that:

6.3.2. If a habitat has been cleared, destroyed or degraded previously, and an earlier baseline should be used, assessors must use the following approach in the metric:

- use the pre-degradation habitat type as the site's baseline
- note how this habitat type and condition has been determined
- account for the time between the habitat loss and compensation through the [temporal risk](#) function

Accordingly, this lost habitat should be included in the BNG 4.0 baseline habitat

³ 22_05998_F-ARBORICULTURAL_ASSESSMENT_REV_E__RPT._NO._11100_-3367759

⁴ 22_05998_F-PLANTING_SCHEDULE-3490387

⁵ 22_05998_F-BIODIVERSITY_NET_GAIN_METRIC-3490944

⁶ 22_05998_F-BIODIVERSITY_NET_GAIN_METRIC-3490944



calculation. We have used the tree survey data in the AIA in our calculation below:

| Trees | 7 | 7 | BNG 4.0 Totals | | 0.0048 | | 0.1914 | 0.1914 | 0.0000 |
|---------|------------|---------------|----------------|-----------------------|-------------------|------------------|------------------|----------------------|-----------------------|
| Tree ID | Tree Count | Trees Removed | DBH (cm) | RPA (m ²) | Baseline RPA (ha) | BNG 4.0 Category | Baseline Habitat | Habitat removed (ha) | Habitat Retained (ha) |
| T1 | 1 | 1 | 54 | 6.50 | 0.0007 | Medium | 0.0366 | 0.0366 | 0.0000 |
| T2 | 0 | 0 | 73 | 8.80 | 0.0009 | Medium | 0.0000 | 0.0000 | 0.0000 |
| T3 | 0 | 0 | 68 | 8.20 | 0.0008 | Medium | 0.0000 | 0.0000 | 0.0000 |
| T4 | 1 | 1 | 58 | 7.00 | 0.0007 | Medium | 0.0366 | 0.0366 | 0.0000 |
| T5 | 1 | 1 | 34 | 4.10 | 0.0004 | Medium | 0.0366 | 0.0366 | 0.0000 |
| T6 | 1 | 1 | 33 | 4.00 | 0.0004 | Medium | 0.0366 | 0.0366 | 0.0000 |
| T7 | 1 | 1 | 26 | 3.10 | 0.0003 | Small | 0.0041 | 0.0041 | 0.0000 |
| T8 | 1 | 1 | 36 | 4.30 | 0.0004 | Medium | 0.0366 | 0.0366 | 0.0000 |
| T9 | 1 | 1 | 13 | 1.50 | 0.0002 | Small | 0.0041 | 0.0041 | 0.0000 |

This habitat covered a total area of 0.1914 hectares of which none has been retained. On the basis that its condition was Moderate, this provided 1.53 Habitat Units.

c) Individual tree habitat created is overestimated

We have adopted the proposed onsite planting of 41 trees on site as set out in the planting schedule⁷ which will become Small category at the expiry of the time-to-target period of 30 years and will provide 0.1669 hectares of habitat (0.46 habitat units) in Moderate condition.

d) Delay in starting habitat creation

Given that the habitat existing on the site has already been removed and that some time will elapse before it is replaced, we have allowed a delay of three years for habitat to be created.

e) The trading rules have not been complied with

The applicant’s own calculation fails to comply with the trading rules.⁸ There is a shortfall of 0.04 habitat units of broad habitat *Heathland and scrub*.

⁷ 22_05998_F-PLANTING_SCHEDULE-3490387

⁸ The Biodiversity Metric 4.0 - User guide - section 3.2



We calculate that there is a shortfall of 0.08 habitat units of broad habitat *Heathland and scrub* and 1.07 habitat units of broad habitat, *Individual trees*.

f) The delivery of biodiversity net gain

Our calculations show that, without further habitat creation, the applicant’s proposals will result in a net loss of biodiversity of **-27.76%**.

Paragraph 179 b) of the National Planning Policy Framework requires that plans should ‘identify and pursue opportunities for securing measurable net gains for biodiversity.’⁹ As currently proposed these plans fail to do this.

If a further 0.03 hectares of broad habitat *Heathland and scrub* in poor condition after 4 years were created and a further 96 standard-sized trees were planted to produce 0.3909 hectares of broad habitat, *Individual trees* in moderate condition after 30 years in order to comply with the trading rule requirements, then a net gain of **31.46%** could be achieved. We have assumed that these will be planted offsite but within the LPA boundary. The Headline results of our calculations are set out below. A copy of our BNG 4.0 calculation can be [downloaded here](#).

| Temple Quay, Bristol | | Return to results menu | | | |
|---|-------------------|------------------------|----------------|--------------|-------------------------------------|
| Headline Results | | | | | |
| Scroll down for final results | | | | | |
| On-site baseline | Habitat units | 1.99 | | | |
| | Hedgerow units | 0.00 | | | |
| | Watercourse units | 0.00 | | | |
| On-site post-intervention <small>(including habitat retention, creation & enhancement)</small> | Habitat units | 1.44 | | | |
| | Hedgerow units | 0.00 | | | |
| | Watercourse units | 0.00 | | | |
| On-site net change <small>(units & percentage)</small> | Habitat units | -0.55 | -27.76% | | |
| | Hedgerow units | 0.00 | 0.00% | | |
| | Watercourse units | 0.00 | 0.00% | | |
| On-site net gain is less than target | | | | | |
| Off-site baseline | Habitat units | 0.00 | | | |
| | Hedgerow units | 0.00 | | | |
| | Watercourse units | 0.00 | | | |
| Off-site post-intervention <small>(including habitat retention, creation & enhancement)</small> | Habitat units | 1.18 | | | |
| | Hedgerow units | 0.00 | | | |
| | Watercourse units | 0.00 | | | |
| Off-site net change <small>(units & percentage)</small> | Habitat units | 1.18 | N/A | | |
| | Hedgerow units | 0.00 | 0.00% | | |
| | Watercourse units | 0.00 | 0.00% | | |
| Combined net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small> | Habitat units | 0.63 | | | |
| | Hedgerow units | 0.00 | | | |
| | Watercourse units | 0.00 | | | |
| Spatial risk multiplier (SRM) deductions | Habitat units | 0.00 | | | |
| | Hedgerow units | 0.00 | | | |
| | Watercourse units | 0.00 | | | |
| FINAL RESULTS | | | | | |
| Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small> | Habitat units | 0.63 | | | |
| | Hedgerow units | 0.00 | | | |
| | Watercourse units | 0.00 | | | |
| Total net % change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small> | Habitat units | 31.46% | | | |
| | Hedgerow units | 0.00% | | | |
| | Watercourse units | 0.00% | | | |
| Trading rules satisfied? | Yes ✓ | | | | |
| Unit Type | Target | Baseline Units | Units Required | Unit Deficit | |
| Habitat units | 10.00% | 1.99 | 2.19 | 0.00 | This requirement met or surpassed ✓ |
| Hedgerow units | 10.00% | 0.00 | 0.00 | 0.00 | This requirement met or surpassed ✓ |
| Watercourse units | 10.00% | 0.00 | 0.00 | 0.00 | This requirement met or surpassed ✓ |

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