



## 23/03248/F | Erection of detached dwelling. | Land Adjacent To 31 Ridgehill Bristol BS9 4SB

### Introduction

This is an application to build a house on a small plot of land of approximately 300 square metres. The plot lies at the intersection of footpaths leading from Ridgehill and Sates Way to a public footpath running around the southern and western edges of Golden Hill Sports Ground. It has been suggested that the paths crossing the site are also public rights of way (PROWs). There is also an application to have the site designated a Town and Village Green (TVG). Our interest, however, is in the trees and biodiversity on and adjacent to the site.

The applicant has submitted arboricultural evidence<sup>1</sup> but has not produced biodiversity net gain evidence. We take issue with the arboricultural evidence, which does not comply with the Council's [Planning Application Requirements](#). This states that plans should include all trees that are *'within the application site or on land adjacent to it that could be influenced or affected by the development'*.

### The Bristol Tree Replacement Standard (BTRS)

Whilst the trees on site are shown on the plans annexed to the arboricultural evidence (the Redline boundary is omitted), the trees along the eastern boundary are shown as a group rather than as individual trees, even though they include four or five mature trees that oversail the development site. As a result, it is impossible to say which, if any, of these trees 'could be influenced or affected by the development' because their RPAs and canopies cannot be ascertained. Whilst there are no plans to remove the trees in this group, it is possible that their location may influence the steps that needed to protect them.

Of the five trees and one group on the site, three trees will be removed - T3, T5 & T6. We calculate that, under the BTRS and SADMP DM17, five replacements will be required. The applicant suggests that these trees will be planted but given the proposed layout of the house and the pull-in, we are of the view that this would lead to overstocking and is unrealistic, especially given the size of the two remaining trees (T1 & T4) that will be retained. In our view, at most, only one more tree could be accommodated on site. The remaining four trees would need to be planted elsewhere offsite.

We note that it is proposed to redirect the footpaths to run along the southern border and pass through the root protection area (RPA) of the Norway Maple, T1. We question whether this is practicable, given both the likely foot traffic and the need to make the new footpath

---

<sup>1</sup> 23\_03248\_F-ARBORICULTURAL\_ASSESSMENT-3529218 & 23\_03248\_F-ARBORICULTURAL\_ASSESSMENT-3532465



## Comments - 22 October 2023

accessible. So far, no detailed method statement has been produced. This will need to be addressed in detail.

We also note that, because the RPA of T1 will be close to or within the foundations of the building, it is proposed that ground protection will be installed. Again, no detailed method statement has been provided. This too needs to be addressed.

### Biodiversity Net Gain

Whilst no biodiversity net gain proposals are currently required under the Environment Act 2021, paragraph 179b of the NPPF<sup>2</sup> requires that developer's plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity.' In this case, a biodiversity metric calculation needs to be provided.

In the normal course of events, a Small Sites Metric calculation would be sufficient given the size of the development but, given that offsite provision will be required, this is not permitted and a full calculation using BNG 4.0 is required<sup>3</sup>.

Our analysis shows that the baseline tree habitat (individual tree - Urban) area for the trees on site is 0.1506 ha, of which 0.0407 hectares will be retained. We have set the condition of the habitat to Medium and the Strategic significance of the habitat at Medium - 'Location ecologically desirable but not in local strategy'. This provides 1.33 Habitat Units (HUs).

We have assumed that the rest of the site comprises a Modified Grassland habitat of 0.302 ha in Moderate condition but of low strategic significance - 'Area/compensation not in local strategy/ no local strategy.' This provides 1.21 HUs. We have assumed that one-third of this habitat will be retained with the rest being developed and its biodiversity lost.

On this basis, we calculate that the proposals will result in a loss of **69.97%** of the baseline habitat - **1.77 HUs**.

If the application is to achieve a biodiversity net gain of at least 10% and comply with the Rule 3 Trading rules, then 148 BNG 4.0 Small category trees will need to be planted offsite to create 0.6026 hectares of new Individual tree habitat in Moderate condition in an area of Medium Strategic significance within the LPA after 27 years.

The Headline results of our calculation are set out below.

---

<sup>2</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1182995/NPPF\\_Sept\\_23.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf)

<sup>3</sup> <https://publications.naturalengland.org.uk/publication/6047259574927360> and see <https://nepubprod.appspot.com/publication/6049804846366720>



31 Ridgehill BS9 4SB - land adjacent to		Return to results menu	
Headline Results			
Scroll down for final results			
<b>On-site baseline</b>	Habitat units	2.53	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>On-site post-intervention</b> <small>(Including habitat retention, creation &amp; enhancement)</small>	Habitat units	0.76	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>On-site net change</b> <small>(units &amp; percentage)</small>	Habitat units	-1.77	-69.97%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
<b>On-site net gain is less than target set</b>			
<b>Off-site baseline</b>	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>Off-site post-intervention</b> <small>(Including habitat retention, creation &amp; enhancement)</small>	Habitat units	2.03	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>Off-site net change</b> <small>(units &amp; percentage)</small>	Habitat units	2.03	N/A
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
<b>Combined net unit change</b> <small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>	Habitat units	0.25	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>Spatial risk multiplier (SRM) deductions</b>	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>FINAL RESULTS</b>			
<b>Total net unit change</b> <small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>	Habitat units	0.25	
	Hedgerow units	0.00	
	Watercourse units	0.00	
<b>Total net % change</b> <small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>	Habitat units	10.03%	
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
<b>Trading rules satisfied?</b>	Yes ✓		

Our calculation assumes that all the lost BNG will be wholly provided by creating Individual tree habitat. However, it is possible to meet the BNG 4.0 trading rules and achieve at least 10% BNG by providing just 71 BNG 4.0 Small category trees (worth 0.97 HUs) so long as the remaining lost habitat provides a further 1.10 HUs comprising Medium Distinctiveness habitats. This will still need to be provided offsite given the site size.

A copy of our calculation will be made available.