



23/03826/F | Replacement of the current South and South West Stands with a new improved facility to increase the number of seats within the Memorial Stadium, and new toilet facilities and concession stalls. | The Memorial Stadium Filton Avenue Bristol BS7 0AG

We are pleased that the applicant has finally produced a properly formulated application, including evidence about the trees and other habitat on the site. While we have some technical points to make, set out below, we believe that this proposal presents an opportunity to mitigate the lost trees and habitat and bring a long-term benefit to the local community.

DM17 and BTRS

We also note that the applicant has failed to take account of its obligations under SADMP DM17/BTRS and has not calculated the number of replacement trees required. We calculate that six replacements will be needed:

<i>Totals</i>		<i>4</i>	<i>4</i>		<i>6</i>
<i>Tree ID</i>	<i>Tree Category</i>	<i>Onsite Tree Count</i>	<i>Trees Removed</i>	<i>DBH (cm)</i>	<i>Trees x Trees Removed</i>
<i>T1</i>	<i>B</i>	<i>0</i>	<i>0</i>	<i>48</i>	<i>0</i>
<i>T2</i>	<i>B</i>	<i>1</i>	<i>1</i>	<i>17</i>	<i>1</i>
<i>T3</i>	<i>C</i>	<i>0</i>	<i>0</i>	<i>19</i>	<i>0</i>
<i>T4</i>	<i>C</i>	<i>0</i>	<i>0</i>	<i>17</i>	<i>0</i>
<i>T5</i>	<i>C</i>	<i>0</i>	<i>0</i>	<i>16</i>	<i>0</i>
<i>T6</i>	<i>B</i>	<i>0</i>	<i>0</i>	<i>24</i>	<i>0</i>
<i>T7</i>	<i>C</i>	<i>1</i>	<i>1</i>	<i>10</i>	<i>0</i>
<i>T8</i>	<i>C</i>	<i>0</i>	<i>1</i>	<i>20</i>	<i>0</i>
<i>G1</i>	<i>B</i>	<i>0</i>	<i>0</i>	<i>17</i>	<i>0</i>
<i>G2</i>	<i>C</i>	<i>1</i>	<i>1</i>	<i>22</i>	<i>2</i>
<i>G3</i>	<i>C</i>	<i>1</i>	<i>1</i>	<i>17</i>	<i>1</i>
<i>G4</i>	<i>C</i>	<i>1</i>	<i>1</i>	<i>24</i>	<i>2</i>
<i>G5</i>	<i>B</i>	<i>0</i>	<i>0</i>	<i>17</i>	<i>0</i>
<i>G6</i>	<i>B</i>	<i>0</i>	<i>1</i>	<i>25</i>	<i>0</i>

Table 1 DM17 Replacement Trees calculation.

We have included tree groups G2, G3 & G4 even though they are unspecified, because they appear to be within the redline area and some of the trees in them have been removed. Our BS5837:2012 DBH (stem diameter) calculations take account of the fact that most of the trees surveyed are multi-stemmed.

The Biodiversity Net Gain calculation

We do not take issue with the Biodiversity Metric calculation done using BNG 4.0, save for the



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following:

1. We do not agree that the onsite trees should be classified as *Woodland and forest - Other woodland; broadleaved* habitat. These trees are clearly *Individual trees - Urban* habitat under paragraph 8.3.5 of the BNG 4.0 User Guide: '*Individual trees may also be found in groups or stands (with overlapping canopies) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. For example, if groups of trees within the urban environment do not match the descriptions for woodland, they may be assessed as a block of individual urban trees.*'
2. We calculate that this habitat covers an area of 0.0147 hectares (ha) and that none has been retained. We accept that it is in Poor condition but has Medium Strategic Significance - Location ecologically desirable but not in local strategy. On this basis, it is worth 0.06 Habitat Units (HUs) and the whole onsite baseline habitat is worth 0.28 HUs. We have adjusted the online baseline area to 0.307 ha by adjusting one of the zero-rated habitats so that this has no impact on the overall calculation.
3. We accept the *Woodland and forest - Other woodland; broadleaved* habitat classification of the offsite trees that fall within the Blueline area to the south-east of the site, even though they too fall within the *Individual trees - Urban* habitat classification. This is because they form a cohesive group, and no information has been provided to allow their habitat area as *Individual trees - Urban* habitat to be calculated; and there is evidence to suggest that this habitat is not woodland.¹
4. We calculate that this offsite habitat area is 0.104 ha, of which 0.02 will be retained and 0.084 ha will be enhanced. We accept the applicant's other baseline parameters. On this basis, the habitat is worth 0.46 HUs.
5. We also accept the applicant's offsite enhancement proposals, which will achieve 0.63 HUs.
6. We recommend that the six replacement trees required under DM17/BTRS also be planted in this habitat so that, at the end of the 27 year time-to-target period they will have achieved Medium condition and contribute 0.08 HUs to BNG.

On this basis, we calculate that these changes will achieve a BNG of 51.06% and contribute net 0.14 HUs to the development rather than the 10.53% BNG and the net 0.03 HUs proposed.

Our BNG 4.0 calculation has been submitted with these comments.

Conclusion

Before we endorse this plan, however, we will want to see the applicant's Landscape Ecological Management Plan (LEMP) and the Conservation Covenant required under Part 7 of the

¹ By viewing a sequence of Google Earth Images between June 2017 and May 2023.



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Environment Act 2021 (EA 21).² Whilst the full effect of the EA 21 has not come into force, the requirement to provide a Conservation Covenant came into force on 30 September 2022.³

The site where offsite habitat creation and enhancement are proposed is currently landlocked. We suggest that it be made accessible to the local community and designated an Asset of Community Value.⁴ In this way the site's future could be secured and provided as part of the mitigation the local community is entitled to as a result of these proposals. This could benefit the applicant because the community could be involved in helping to provide long-term care and maintenance.

We hope that the applicant will take up our suggestion.

² <https://www.legislation.gov.uk/ukpga/2021/30/part/7/enacted>

³ <https://www.legislation.gov.uk/uksi/2022/48/made>

⁴ <https://www.legislation.gov.uk/ukdsi/2012/9780111525791/contents>