



23/02376/M | Hengrove Park (Phase 1) Hengrove Way Bristol

Our preliminary comments

1. The revised Habitat Management and Monitoring Plan¹ (HMMP) fails to comply with the requirements set out in the Gov.UK guidance, Creating a Habitat Management and Monitoring Plan for BNG,² including complying with the information required in the HMMP templates.³ In particular:
 - a) The land owner is not identified.
 - b) The land manager is not identified (the information given at section 1.6 is too vague).
 - c) The name of the person or organisation responsible for creating or enhancing the habitats is not given (the information given at section 1.6 is too vague).
 - d) There is no overview of how funding will be secured to deliver the HMMP.
 - e) There are no details of any legal agreements that will secure the delivery of the HMMP.
 - f) No Site Baseline, Environmental Information and Associated Impacts Checklist has been produced.
 - g) No summary of the Habitat and Condition Targets has been produced.
 - h) No information setting out how the baseline condition of retained habitats will be maintained or protected has been produced.
 - i) Insufficient information (section 1.6) is provided for the production of monitoring reports nor how these will be made publicly available.
 - j) The person or organisation responsible for submitting the monitoring reports is not identified.
2. The HMMP is out of date. It fails to incorporate the latest version of the Biodiversity Metric (BM) calculations which calculate new biodiversity gain percentages of 21.66% for area habitat units and 3,908.30% of hedgerow habitat units.⁴
3. The BM referenced in the HMMP, BNG 4.0, is no longer the approved version. The Statutory Metric⁵ should be used instead.
4. Where they are substantially different, the BNG 4.0 condition sheets will need to be recast using the Statutory Metric condition sheets.
5. Documents referenced at paragraph 1.5 and sections 28 to 32 of Appendix B of the HMMP have not been published. These are:

¹ 23_02376_M-REVISED_HABITAT_MANAGEMENT_AND_MONITORING_PLAN__HMMP_-3629853

² <https://www.gov.uk/guidance/creating-a-habitat-management-and-monitoring-plan-for-biodiversity-net-gain>

³ <https://publications.naturalengland.org.uk/publication/5813530037846016>

⁴ 23_02376_M-UPDATED_BNG_TABLE-3551488

⁵ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>.



BTF HMMP Comments - 30 April 2024

- a) Preliminary Ecological Assessment (PEA) Report, Johns Associates Ltd, September 2023 (also J01198 Hengrove Park Phase One PEA Report, 26 September 2023).
 - b) J01202 Hengrove Park, Reptile Survey Report, Johns Associates Ltd, December 2023
 - c) J01202 Hengrove Park, Bat Activity Survey Report, Johns Associates Ltd, December 2023
 - d) J01198 Hengrove Park Phase One 4.0 V1.
 - e) J01198 Condition Assessment Sheets (Hengrove Park Phase One PEA Report, Appendix C.
 - f) Drawing J01198-P1-02 baseline UKHab Classification.
 - g) J01161 Culverhayes Care Home BNG Assessment Report (included in error?).
6. It is not clear if the pre-construction proposals at section 3.1 relate only to those parts of the site where construction will take place.
 7. There is not indication whether the habitat creation and enhancement work proposed to those parts of the site where construction will not take place, e.g. the eastern section of the development site, commence - will take place before, during or after the construction phase?
 8. The term 'undesirable species' at section 3.4.4 needs to be defined.
 9. It is unclear if fallen leaves under trees be retained or removed - see 3.4.7, Autumn Clearance and 3.4.8, Arisings.

The Biodiversity Gain Plan, Appendix B

10. Section 19 states: 'Where possible, all habitats of higher 'distinctiveness' have been retained.' These habitats have not been identified. What does this mean?
11. Section 19 also states: 'Individual Trees: *Several trees removed. Others are retained and protected, in line with Root Protection Areas. Tree removal is compensated with woodland planting and tree planting.*'

Individual trees habitat which has been removed may not be compensated with woodland planting (the creation of *Woodland and forest* habitat) if this involves creating *Woodland and forest - Other woodland; broadleaved* habitat or any other broad *Woodland and forest* habitat of the same medium distinctiveness.

This is contrary of the biodiversity gain trading rules which require that losses of medium distinctiveness habitat '*must be replaced by area habitat units of either medium band habitats within the same broad habitat type or, any habitat from a higher band from any broad habitat type.*'⁶ *Woodland and forest - Other woodland; broadleaved* habitat is a medium distinctiveness belonging to a different broad habitat type to the *Individual trees*

⁶ https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf - page 13.



broad habitat.

12. Section 21. Why are the on-site enhancements not considered significant? 3.215 hectares of the 9.15 hectares of baseline habitats (some 35%) are proposed to be enhanced.
13. The response section 27 is incorrect. The Statutory Biodiversity Metric has not been used as section 28 attests.
14. The responses given at sections 36, 37 & 38 are out of date.
15. Section G, Off-site habitat enhancements. Our calculations show a shortfall of 1.91 habitat units of *Woodland and forest - Other woodland; broadleaved* habitat. It is likely that this will need to be mitigated offsite to achieve both the minimum 10% biodiversity target and comply with the trading rules.

Generally

16. We note that the development of Hengrove Park still elicits significant feeling from local residents who value the park as a local amenity for a number of recreational and leisure purposes. We question whether those proposals for creating and enhancing the biodiversity in around those parts of the development on the eastern section of the site are realistic, given that they will remain open to free access by the community and pets.
17. In particular, we note that there are no proposals to protect slow worms or hibernating reptiles, amphibians and hedgehogs or bats in bat boxes from potential conflict with visitors and their pets.
18. We are concerned about the potential health and safety and habitat degradation implications of leaving the wetland areas open access. We doubt that 'regular annual ecological inspections to remove litter and debris' will be sufficient.