



21/01999/F - Former Car Park, College Road, Clifton, Bristol BS8 3HX - known as the Western Car Park, Bristol Zoo Gardens - Erection of 65 dwellings with associated parking, new vehicular access, and associated infrastructure and landscaping.

Bristol Tree Forum Statement

Our detailed comments on this application are published here:

https://bristoltreeforum.files.wordpress.com/2021/06/btf-comments-21_01999_f-former-car-park-college-road.pdf.¹

This application, as currently formulated, should be refused. If allowed, 16 trees will be removed, thereby reducing the tree canopy cover on the site by nearly 7%. Both the Mitigation Hierarchy (National Planning Policy Framework²) and Bristol's Development Framework Core Strategy BCS9 state that tree removals should be avoided where possible. It should be straightforward to design the site around the existing trees so that none need be lost.

This car park is an integral part of the Bristol Zoo Gardens, which is still in use. Given the announcement that the gardens will soon be closing, this application should not be decided separately from any decision about its long-term future.

We believe that the trees should be retained wherever possible and that the design of the development should be amended to facilitate this. Certainly, none of the trees growing on the boundaries of the site need to be removed.

The application of the Mitigation Hierarchy

The Mitigation Hierarchy is a cascading decision process: only if the preceding choice is unavailable is the succeeding option considered. This is the decision-making order:

1. Avoid - Where possible habitat damage should be avoided.
2. Minimise - Where possible habitat damage and loss should be minimised.
3. Remediate - Where possible any damage or lost habitat should be restored.
4. Compensate - As a last resort, damaged or lost habitat should be compensated.

The appellant has failed to demonstrate that its plans can only be realised if the trees it identifies are removed. The presence of the trees is merely an inconvenience to its preferred scheme and they are being removed for no other reason. This is not enough to justify the removal of the trees growing here as per BCS9 or the National Planning Policy Framework.

We also note that no Biodiversity Survey and Report has been provided even though this is required under Bristol's Planning Application Requirements Local List 1st December 2017. This should have included a Biodiversity Metric Calculation.³

¹ https://bristoltreeforum.files.wordpress.com/2021/06/btf-comments-21_01999_f-former-car-park-college-road.pdf

² <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³ <http://publications.naturalengland.org.uk/publication/6049804846366720>