



22/03309/F | Development of site for up to 187 residential units and a mix of non-residential uses falling within Use Classes E, F1 and F2, together with associated external works and public realm, including a new park layout, cycle routes and central spine. | Open Space Glencoyne Square Bristol BS10 6DE

We have now seen the applicant's updated ecological and biodiversity evidence:

- 22_03309_F-ECOLOGIST-3499078
- 22_03309_F-UPDATED_ECOLOGICAL_MITIGATION_AND_BIODIVERSITY_NET_GAIN-3498142
- 22_03309_F-UPDATED_BNG_CALCULATIONS-3498143

We still object to this application for the following reasons:

1. As we have already pointed out, Glencoyne Square Open Space is designated as both a **Park and Green Space** and as an **Important Open Space** and so is protected under the Local plan by policies BCS9 & DM17. The proposed development is not permitted under the Local Plan because it does not meet the BCS9 criteria and is not ancillary to the open space use as required under DM17. None of this new evidence addresses this key impediment to development or recognises the site's high strategic importance under the Biodiversity Metric.
2. The BNG calculation also fails to discount habitat created in areas outside the control of the developer - e.g., 10 small trees in [private] courtyards and vegetated [private] courtyards. Habitat which the developer cannot manage under any LEMP should not be included in the BNG calculation.
3. We note that the latest, now out-of-date BNG 3.1 calculation has resulted in a decrease from 4.04% BNG area habitat units to 3.36% BNG, significantly less than will be required when Schedule 14 of the Environment Act 2021¹ finally comes into force and less than the Council aspires to under its own Ecological Emergency Action Plan 2021- 2025,² hardly an exemplar for other developers.
4. The applicant should submit a draft 30-year Landscape and Ecological Management Plan (LEMP) and Conservation Covenant³ before this application is considered, not after.

¹ <https://www.legislation.gov.uk/ukpga/2021/30/schedule/14/enacted>

² <https://www.bristol.gov.uk/files/documents/794-ecological-emergency-action-plan/file>

³ In force since 30 September 2022 - [The Environment Act 2021 \(Commencement No. 2 and Saving Provision\) Regulations 2022](#)