



**25/14849/M | Application for the approval of Reserved Matters (layout, appearance, scale, and landscaping) pursuant to outline permission 22/01878/P (Development of up to 260 new residential dwellings (Class C3 use) together with pedestrian, cycle and vehicular access, cycle and car parking, public open space and associated infrastructure. Approval sought for access with all other matters reserved). | Land At Broom Hill/Brislington Meadows Broomhill Road Bristol BS4 4UD**

### **The Biodiversity Net Gain and arboricultural evidence**

The applicant has submitted only two documents in support of its Biodiversity Net Gain (BNG) proposals:

1. A BNG Strategy (BNG\_STRATEGY-4069070).
2. A preliminary Statutory Metric calculation dated 25 October 2025 (PRELIMINARY\_STATUTORY\_BNG\_METRIC\_24-10-2025-4069069).

These documents are identical to those submitted in support of the parallel application, 25/14850/COND.

The Ecological Impact Assessment (ECOLOGICAL\_IMPACT\_ASSESSMENT-4069067), referred to at paragraph 1.1.3 of the BNG Strategy, contains no baseline evidence to support the BNG calculations. The post-development BNG evidence is very limited at best.

This is contrary to condition 26 of the outline planning grant,<sup>1</sup> which requires ‘*an updated Ecological Impact Assessment (EclA), prepared in accordance with published CIEEM guidelines and informed by the Outline Ecological Impact Assessment (TEP Ref. 7507.20.066 v6 April 2022).*’

There is no evidence that the site has been resurveyed since the April 2022 survey was undertaken on behalf of Homes England. This survey includes a survey of the baseline and post-development habitats present on the site at the time.

We are advised (paragraph 1.1.2 of the BNG Strategy) that:

*Final and fixed landscape plans are awaited to finalise the BNG strategy alongside the final results of the UKHab surveys on the potential offsetting site, Brislington Meadows SNCI.*

However, comparing the BNG evidence submitted with the outline application appeal in 2022/2023 with the Statutory Metric calculation submitted with this application, we note that:

- the area and linear baseline habitat sizes are different.
- the habitat parcels have increased from 40 to 47.

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<sup>1</sup> 22/01878/P (APP/Z0116/W/22/3308537) - 7507.20.068 Brislington Meadows - Outline BNG Metric3 SUBMITTED.



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- the distribution of these habitats has changed. For example, originally there were five *Blackthorn scrub* habitat parcels, whereas now there are four and the number of Bramble scrub habitat parcels has increased from six to 16.

This suggests that the site has been resurveyed. If so, a copy of the survey needs to be made available.

If no new survey has been undertaken, then this needs to be done. The Chartered Institute of Ecology and Environmental Management (CIEEM) advises that '*It is important that planning decisions are based on up-to-date ecological reports and survey data.*' The EIA referred to above is dated April 2022 but will have been based on a survey undertaken earlier than this. The CIEEM advises that reports more than three years old are 'unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated.'<sup>2</sup> In light of this, a full set of new BNG surveys and reports will need to be commissioned.

It is also notable that the BNG calculation omits all the *Individual trees* habitat, including veteran and notable trees, on the site. We refer to the arboricultural and other evidence that was submitted in support of the outline planning appeal.

On the basis of that evidence, we calculated that there are, at a minimum, at least 4.4058 hectares of baseline *Individual tree - Urban* habitat onsite, including irreplaceable veteran tree habitat.

As the trees were last surveyed (as far as we are aware) on 20 July 2020, a new survey will need to be undertaken. The BS5837:2012 (the British Standard for Trees in relation to design, demolition and construction advice) is that arboricultural surveys are generally considered valid only for a period of 12 months. This is because the condition of trees can change significantly over a short time due to factors such as changing environmental conditions, onset of disease, or storm damage.

Until this BNG and arboricultural evidence is available, this matter cannot be decided.

We note that the applicant proposes offsetting lost biodiversity to nearby fields which form part of the Brislington Meadows SNCI. If this matter is going to be dealt with under the now-mandatory BNG regime, which came into force in February 2024, then this will not be possible. Offsite biodiversity offsetting may only be undertaken on registered Biodiversity Gain Sites (BGS) and these none of these areas are registered BGS sites.<sup>3</sup> The LPA needs to state whether this application will be dealt with under the mandatory BNG regime or not.

We note that the applicant has committed to achieving at least 10% BNG in any event.<sup>4</sup>

We reserve our position on the more detailed arboricultural and habitat issues we have identified.

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<sup>2</sup> <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>.

<sup>3</sup> <https://bgs.bristoltrees.space/sites>.

<sup>4</sup> BNG\_STRATEGY-4069070 - section 1.1.1.