



25/14850/COND | Application for approval of details reserved by condition 13 and 25 of permission 22/01878/P (APP/Z0116/W/22/3308537) Application for Outline Planning Permission with some matters reserved - 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. | Land At Broom Hill/Brislington Meadows Broomhill Road Bristol BS4 4UD

This is the first reserved matters application. In it, the applicant seeks to discharge conditions 13 and 25 of the reserved matters, as set out in appeal decision APP/Z0116/W/22/3308537.¹ An application for approval of reserved matters requires the submission of a site plan and a location plan. These items have not been provided.

The following comments relate only to condition 25 (a reserved matter), which states:

1. Prior to, or concurrent with, the submission of the first reserved matters submission(s), a Biodiversity Net Gain (BNG) Strategy shall have been submitted to and approved in writing by the Local Planning Authority. The BNG Strategy shall detail proposals to redress loss of biodiversity and the mitigation strategy proposed to include all on-site habitats and any off-site habitats required to deliver the target 10% BNG uplift. This shall be informed by a contemporary habitat survey and condition assessment of the whole site and any off-site habitats. The BNG Strategy shall use the Biodiversity Metric 3.0 Calculation Tool unless an amended statutory Biodiversity Metric Calculator associated with the Environment Act 2021 becomes mandatory.

2. On completion of each Phase, an update to the BNG Strategy shall be submitted to the Local Planning Authority, demonstrating how BNG has been delivered for that Phase and how the target 10% is anticipated to be delivered during the remaining course of development.

However, conditions 26 and 27 should also be the subject of this application. They are not only reserved matters but are also integral to the interpretation and application of condition 25. These two conditions state:

26) The first reserved matters submission(s) shall include 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). The updated EclA should be updated for each Phase thereafter. This shall include repeat protected species surveys as appropriate.

¹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3308537&CoID=0>.



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27) *The first reserved matters submission(s) shall include combined Ecological Mitigation Method Statements (EMMS). The EMMS shall include, but not be limited to, information on the following:*

- a) native bluebell (preservation, translocation or mitigation for loss);*
- b) invasive species (prevention of spread);*
- c) slow worm (protection of slow worms, translocation plan in line with Natural England guidelines, and mitigation for habitats);*
- d) birds (protection of nests and mitigation for nesting habitat);*
- e) invertebrates (protection of key habitat features and mitigation for habitats);*
- f) badgers (protection and mitigation for habitats and/or setts);*
- g) hedgehogs and other small wildlife including terrestrial amphibians (protection of animals and mitigation for habitats, including permeability measures);*
- h) bats (protection of and mitigation for tree roost habitats and commuting/foraging habitat); and,*
- i) measures to avoid and minimise harm to the Brislington Meadows Site of Nature Conservation Interest (to include measures related to the drainage connection works).*

In support of its application to discharge condition 25, the applicant has only submitted two documents:

1. An undated BNG Strategy draft (BNG_STRATEGY_DRAFT-4069127).
2. A preliminary Statutory Metric calculation dated 25 October 2025 (PRELIMINARY_STATUTORY_BNG_METRIC_24-10-2025-4069128).

There is no ‘*contemporary habitat survey and condition assessment of the whole site and any off-site habitats.*’ Instead, we are advised that ‘*[d]etails of the habitats present on site alongside the protected species baseline are detailed within the Ecological Impact Assessment (Ethos, 2025), which should be read in conjunction with this BNG Strategy*’. This document has not been published.

However, comparing the BNG evidence submitted with the outline application appeal² in 2022/2023 with the latest evidence submitted,³ we note that:

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

² 22/01878/P (APP/Z0116/W/22/3308537) - 7507.20.068 Brislington Meadows - Outline BNG Metric3 SUBMITTED

³ PRELIMINARY_STATUTORY_BNG_METRIC_24-10-2025-4069128



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In addition, there are no ‘*repeat protected species surveys*’, as condition 26 requires.

This reliance is also contrary to condition 26, 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).*’

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 EclA 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.’⁴ In light of this, a full set of new ecology reports will need to be commissioned.

Once these mandated surveys are complete, the applicant will then be able to comply with condition 27 and produce the mandated *Ecological Mitigation Method Statements (EMMS)*.

Until this suite of evidence is available, this matter cannot be decided.

In the meantime, we reserve our position on the more detailed arboricultural and habitat issues we have identified.

⁴ <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>