



25/14832/M | Application for the approval of reserved matters (appearance, layout, scale and hard/soft landscaping) in relation to a residential-led development, pursuant to outline planning permission 21/03166/P. | Land North of Metrobus Ashton Vale Bristol

This application for reserved matters approval has been revised, yet it still fails to meet the basis upon which the original outline application was approved. In support of its outline application, the applicant advised that it was possible to achieve the minimum 10% BNG required on site (our underlining for emphasis):

*Based on the current landscape design, it is possible to achieve a biodiversity net gain on site, as required by planning policy. The current calculated change is a 13.23% (3.29 BU) net gain for area based habitats and a 80.69% net gain (1.68 RUs) for watercourses. This demonstrates a net gain for the biodiversity of the site and is above the 10% net gain required by planning policy, with opportunities to further increase the biodiversity of the site.*¹

This was one of the material reasons why the planning committee approved the outline application. However, these revised reserved matters proposals will result in a substantial net loss of biodiversity on the site.

Since the applicant has not proposed to make good these habitat losses on the site, we assume that it will seek to do so by buying off-site habitat units elsewhere. The Biodiversity Gain Sites (BGS) market currently offers 248 such sites across the country, details of which are available here - <https://bgs.bristoltrees.space/sites>.

Since mandatory BNG was introduced just over two years ago, 19 development sites across Bristol have sourced their biodiversity offsetting requirements outside the city. This represents nearly 3 hectares of lost habitat offset in sites located far from their original locations (ranging from just over 7 to over 350 km away). If this trend is allowed to continue, the little biodiversity that the city enjoys will decline even more.

The revised biodiversity net gain evidence

The applicant continues to rely on the flawed BNG 2.0 metric, presumably because the LPA has not required it to use the later version.² Ideally, the now-mandated statutory metric calculator should have been used. Since it hasn't been, all the flaws we previously pointed out persist. We also note that the revised calculation bears the same date, 30 October 2025, and version number as its earlier iteration.

This flawed metric is accompanied by a revised **Biodiversity Net Gain Statement and Assessment**, dated 05 May 2026.³

¹ P-BIODIVERSITY_NET_GAIN_ASSESSMENT_REPORT-2966410.pdf - Executive Summary. Date 31 March 2021.

² 25_14832_M-BNG_METRIC-4215875.xlsx.

³ 25_14832_M-BNG_STATEMENT_AND_ASSESSMENT-4215873.pdf.



Analysing the BNG 2.0 metric calculation

The revised BNG 2.0 metric calculation (which includes the proposed on-site improvements) now reveals greater habitat losses than what was proposed in its earlier iteration:

- *Area habitat* - **-20.97%** HU, a loss of **-53.45%** BNG, an increase of lost net biodiversity habitat from the **-46.92%** previously proposed.
- The *Watercourse* habitat losses have not changed and remain at **-2.34** HU, a loss of **-39.68%** net biodiversity previously proposed.
- The *Hedgerow* habitat gains have not changed.

The latest calculation produced no longer shows the **Trading Summary** tab, so it is not possible to see the extent of the trading rules breaches that are likely to persist. A revised version of this metric showing this tab needs to be published.

Despite their titles, neither the original nor the revised **Biodiversity Net Gain Statement and Assessment** describe how or to what degree these losses and trading rules breaches will be offset. The revised version only deals with how the Landscape and Ecological Management Plan & Ecological Mitigation and Enhancement Strategy will be delivered.

There are no BGS sites within the city; the nearest site outside the city boundary is the Belmont Estate in North Somerset, some 6 km from the development site.⁴ However, there is no guarantee that the Belmont Estate has the offsetting habitats required, so the lost biodiversity of the development site could be dispersed at other sites across the country.

Notes

- 1 These comments are in addition to our preliminary comments of 13 January 2026,⁵ which we continue to rely on.
- 2 The Biodiversity Net Gain Statement and Assessment dated 23 October 2025 and published in support of parallel application 25/14724/M,⁶ lists the on-site baseline and indicative post-development BNG position shown in Table 1: Summary of on-Site BNG Metric Assessment. However, this data is not the same as that shown in the same table produced in support of the report bearing the same name but dated 30 October, which is published to support this application.⁷

⁴ <https://bgs.bristoltrees.space/sites/BGS-200225002>.

⁵ 25_14832_M-BRISTOL_TREE_FORUM-4117980.pdf.

⁶ <https://pa.bristol.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=T4UNJ4DNHH900> - 25_14724_M-BIODIVERSITY_NET_GAIN_STATEMENT_AND_ASSESSMENT-4062990.pdf.

⁷ 25_14832_M-BIODIVERSITY_NET_GAIN_STATEMENT_AND_ASSESSMENT-4067751.pdf.