

22/01878/P Land At Broom Hill/Brislington Meadows Broomhill Road Bristol BS4 4UD – Objection

Thank you for consulting Nature Conservation on this application.

The Ecological Desk Study, EcIA, 8No ecological appendices and the BNGA for this application have been reviewed, and a site visit was carried out by the BCC Nature Conservation officer and a BCC Tree Officer on 9th June.

The ecological surveys carried out for this application are thorough and paint a good picture of the ecological features of the site. It is clear this site overall has high ecological value.

The site is no longer formally identified in the Bristol Wildlife Network as an SNCI, but still forms an important green space for wildlife and ecological connectivity in Bristol.

In its current form, it is considered that this proposal is likely to result in multiple species displacement from site due to extensive habitat loss. It is considered that this displacement would be likely to be permanent as any habitat creation on or off-site post-development will not adequately replicate that which is going to be lost and is supporting species on site currently. Additionally, the establishment of any proposed new habitat would take such time, that existing species are likely to have left the site permanently. The habitat currently proposed to be lost is very well established (in some cases 'ancient') and supports a number of species including breeding birds, potentially badgers, bats, slow worms (all protected by the Wildlife and Countryside Act 1981, and The Conservation of Habitats and Species Regulations 2017), invertebrates, pollinators in very high numbers (key species to protect with regards to the Ecological Emergency in Bristol and the Climate Crisis) and others like deer, and fox.

Habitat loss includes:

1. mature trees;
2. extensive grassland meadows, supporting species like native bluebell (protected by the Wildlife and Countryside Act 1981), invertebrates and pollinators;
3. dense scrub (habitat of principle importance in the Bristol Biodiversity Action Plan (BAP));
4. mature woodland (habitat of principle importance in the Bristol Biodiversity Action Plan (BAP));
5. and finally, 'important' hedgerows, protected by the Hedgerows Regulations 1997, a Section 41 Habitat of Principal Importance in England under the Natural Environment and Rural Communities Act (2006). Using the BCC Know Your Place mapping system online, the 1840s Tithe plan shows the same field structure in place as is existing currently at Brislington Meadows within the central part of the site. Only the northern boundary has changed since this date due to development of the school. This shows that the hedgerows and the standard trees present in them were in existence prior to the Enclosures Act (mainly passed between 1720 and 1840) and as such are ancient as defined by the DEFRA National Habitat Action Plan. These hedgerows therefore contain irreplaceable habitat (ancient trees) and according to paragraph 180 of the NPPF this alone is grounds for refusal of this application in its current form.

Biodiversity Net Gain is currently not achieved by the proposals for this site. A 24% loss in habitats is the current projection, with a 123% increase in hedgerows. As a gain in both area habitats and hedgerows must be achieved on a site to achieve an overall biodiversity gain, the BNG calculation for this site currently is not acceptable. The revised NPPF (2021) states in paragraph 174 (d) on page 50 that "*Planning policies and decisions should contribute to and enhance the natural and local*

environment by... minimising impacts on and providing net gains for biodiversity...". Currently land has not been secured for biodiversity offsetting to achieve net gains in biodiversity for this site.

A 10% net gain in biodiversity would be expected from an application like this due to the size and complexity of the site with regards to ecology. The supported documentation demonstrates that mitigation for habitat loss alone (to achieve 10% BNG) could not be achieved entirely on site with the current proposal. It is further considered that this would be unlikely to be achieved in later design stages even with a change in layout. The mitigation required on and off-site to achieve 10% BNG would take years to establish to support the number of species the current habitats on site do. Together these factors indicate that the development could result in permanent displacement of the species currently on site.

As it stands from a nature conservation perspective the proposal would result in extensive loss of habitats (some ancient), the likely displacement of multiple species and impact on a high number of pollinators, and does not yet contain proposals to adequately replace them.

This proposal therefore requires an objection as it does not align with the following:

1. Policy BCS9 - Green Infrastructure. *"Individual green assets should be retained wherever possible and integrated into new development. Loss of green infrastructure will only be acceptable where it is allowed for as part of an adopted Development Plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy. Appropriate mitigation of the lost green infrastructure assets will be required; Development should incorporate new and/or enhanced green infrastructure of an appropriate type, standard and size. Where on-site provision of green infrastructure is not possible, contributions will be sought to make appropriate provision for green infrastructure off site..."*.
2. Bristol Biodiversity Action Plan, Habitats of Principle Importance.
3. Policy DM17 (Development involving existing green infrastructure) Tree loss
4. Policy DM19 (Development and Nature Conservation). Development which would be likely to have any impact upon habitat, species or features which contribute to nature conservation in Bristol will be expected to *"be designed and sited, in so far as practicably and viably possible, to avoid any harm to identified habitats, species and features of importance"*
5. Policy DM19 (Development and Nature Conservation). Loss of nature conservation value, *development expected to provide mitigation on-site and where this is not possible provide mitigation off-site.*
6. The Hedgerows Regulations 1997
7. BSA1201 *"development should: retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey"*
8. Activities contained within the Ecological Emergency Action Plan
9. NPPF 2021. *Planning policies and decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity*