

From: [Dr. Nick Michael](#)
To: [Rachel Roberts](#)
Cc: [Richard Sewell](#)
Subject: RE: Brislington Meadows - Ecology
Date: 03 September 2020 07:47:16
Attachments: [image001.jpg](#)
[image002.png](#)
[Brislington Meadows.doc](#)

Rachel,

Good morning.

It would be very helpful to have a detailed botanical survey of the land adjacent to Victory Park which should also address any legally protected and priority species. However it was previously advised by Parks that a Section 106 financial contribution of £36,000 for offsite mitigation through the restoration and enhancement of species-rich grassland in the vicinity might be easier to deliver than altering the grazing regime at Victory Park. I recommend that both of these approaches are pursued along with a Biodiversity Net Gain Assessment of the application site as part of a package of mitigation measures (please see also my previous detailed comments to you). The initial request for the survey of Victory Park was made prior to the pre-app.

When a site is allocated within the Local Plan its SNCI designation is removed, although of course its ecological value has not changed.

I attach a copy of the SNCI criteria sheet. This assessment dates from 2010 and so is obviously dated.

I hope this helps.

Best wishes.

Regards,
Dr. Nick Michael B.A., M.A., Ph.D. (Ecology)
Nature Conservation Officer (Planning)
City Design Group – Growth and Regeneration Directorate
Bristol City Council

Tel. 0117 922 3403 - please contact me by email wherever possible

Email: nicholas.michael@bristol.gov.uk

By Post: City Design Group (City Hall), PO Box 3399, Bristol City Council BS1 9NE

From: Rachel Roberts [<mailto:rachelroberts@tep.uk.com>]
Sent: 02 September 2020 19:01
To: Dr. Nick Michael
Subject: RE: Brislington Meadows - Ecology

Dear Nick

Thank you for the emails and information provided. I appreciate you have advised the previous pre-app is now closed and that I should direct correspondence through Development Management. I understand that a new PPA is currently being negotiated, but in the meantime I was hoping you might be able to provide some additional clarification to one of your queries, highlighted in your email below?

You mention in your email below that you'd previously requested the additional area within the adjacent SNCI also be surveyed. Was this request made during the previous pre-application discussions? TEP wasn't appointed at that stage, but we have reviewed the pre-application report (dated 21 January 2020) and our understanding from that report (Appendix C: Ecology) was that additional botanical survey was recommended only of the application site for the grasslands and hedgerows (I can confirm additional botanical surveys were completed by WSP on behalf of Homes England, prior to TEP's appointment).

The pre-application report reiterates the allocation information, which states that development should be informed by "*an ecological survey of the site*" – we assumed this to refer to the application site - and "*make provision for mitigation and compensation measures, including enhancement to the grazing land adjacent to Victory Park and compensation for the loss of semi-improve neutral grassland and damp grassland.*" The pre-application report then goes on to state "*a Section 106 financial contribution for offsite mitigation is recommended*" and subsequently "*Having consulted with Parks, a Section 106 financial contribution of £36,000 for offsite mitigation through the restoration and enhancement of species-rich grassland in the vicinity is now considered likely to be more deliverable than enhancement to the grazing land adjacent to Victory Park*".

Would you therefore please be able to clarify:

1. Is the recommendation in the previous pre-application report for financial contribution for offsite mitigation still the current position of the Council?
2. Is it the preference identified in the previous pre-application report still that the contribution towards offsite mitigation be focussed on restoration and enhancement of species rich grassland elsewhere in the vicinity, rather than the grazing land adjacent to Victory Park?
3. If so, is there still an outstanding recommendation that the application should be supported by survey of the grazing area adjacent to Victory Park?
4. Would it be possible to receive copy of any correspondence relating to the scope of this recommendation for additional survey? Would it be an extended Phase 1 habitat survey, for example?
5. Alternatively, is the requested survey of the additional area related to updating SNCI data held for the Brislington Meadows SNCI (as might be suggested by a later email received from Beckey Belfin)?

On a related matter, would it also be possible to confirm that the SNCI designation for Brislington Meadows no longer overlaps the application site? We have received conflicting data on the matter, as the data returns from BRERC to WSP to support WSP's PEA report indicates the SNCI coverage overlaps with the majority of the application site (as does your map attached), whereas Bristol's interactive local plan map shows the SNCI boundary stopping short at the allocation covering the application site and the pre-application report refers to the site "formerly" being designated as a SNCI. I presume therefore that the interactive local plan and the comment in the pre-application report are correct and that the SNCI boundary has indeed been withdrawn to exclude the allocated area (application site)?

I have been struggling to make contact with BRERC regarding clarifying the current boundary extent for Brislington Meadows SNCI and also obtaining the SNCI citations/data forms. The standard data request online with BRERC does not include the ability to request the underlying citation/data forms for the SNCIs and the data returns from BRERC to WSP also did not include this information, but with current circumstances being as there are with the Covid restrictions I am struggling to get in contact directly with anyone at BRERC that could provide further advice and information on the SNCIs (and any associated cost for obtaining the data forms). I have tried their 'dataenquiries@brerc.org.uk' email address with no luck (so far) and their normal phone number for enquiries is not currently in operation. It would just be really useful to be able to get hold of the SNCI information for sites identified from WSP's initial data search for their PEA. I don't suppose you might possibly have a contact at BRERC you might be able to recommend I try, or alternatively if the Council might also

hold this information for SNCIs?

Many thanks for any assistance you could provide for the above.

Kind regards
Rachel

From: Dr. Nick Michael [mailto:nicholas.michael@bristol.gov.uk]

Sent: 20 August 2020 15:31

To: Rachel Roberts

Cc: Richard Sewell

Subject: RE: Brislington Meadows - Ecology

Rachel,

Good afternoon.

The protocol is that correspondence should be sent to Development Management please in relation to specific planning applications or pre-apps rather than directly to me.

Further protected species surveys are required as set out in the PEA which was submitted with 19/05220/PREAPP. This is set out in Table 7 on page 25 of the report.

A BNG assessment is also required and this should be used to devise mitigation proposals. Ecological mitigation is required to meet the requirements of the National Planning Policy Framework (NPPF). The National Planning Policy Framework (2019) states in paragraph 170(d) on page 49 that planning decisions should minimise impacts on and provide *net gains* for biodiversity. *It is recommended that the proposal employs Natural England's Biodiversity Net Gain (BNG) biodiversity metric 2.0 (as amended) to develop ecological mitigation proposals.* The BNG assessment should be undertaken prior to the validation of a future planning application and not conditioned. BNG assessments will be expected to show a positive figure, i.e. a biodiversity net gain.

A detailed botanical survey of the application area is also strongly recommended. I also note that hedgerows are a Section 41 Habitat of Principal Importance in England under the Natural Environment and Rural Communities Act (2006) and thus a material planning consideration.

I have previously requested that the attached area which adjoins the site is also surveyed. The reason for this relates to the Site Allocations guidance to make provision for "mitigation and compensation measures, *including enhancement to the grazing land adjacent to Victory Park* and compensation for the loss of semi-improved neutral grassland and damp grassland (the site currently has city-wide importance for nature conservation due to the presence and condition of particular species, habitats and/or features." Please let me know if this will be possible?

The provision of living roofs which provide features for invertebrates and areas of bare ground and wildflower meadow (and not Sedum) is recommended. Further guidance follows.

In accordance with Policy DM29 in the Local Plan, the provision of living (green/brown) roofs which do not include Sedum is recommended to provide habitat for wildlife. Policy DM29 states that 'proposals for new buildings will be expected to incorporate opportunities for green infrastructure such as green roofs, green walls and green decks.'

Living roofs can be integrated with photovoltaic panels and also contribute towards Sustainable Urban Drainage Systems (SuDS), air pollution mitigation and reducing the urban heat island effect. Living roofs can be provided on buildings, as well as on bin stores and cycle shelters. The following guidance applies. The roofs should be covered with local low-nutrient status aggregates (not topsoil) and no nutrients added. Ideally aggregates should be dominated by gravels with 10 - 20% of sands. On top of this there should be varying depths of sterilised sandy loam between 0 - 3 cm deep. An overall substrate depth of at least 10 cm of crushed demolition aggregate or pure crushed brick is desirable. The roofs should include areas of bare ground and not be entirely seeded (to allow wild plants to colonise) and not employ *Sedum* (stonecrop) because this has limited benefits for wildlife. To benefit certain invertebrates the roofs should include local substrates, stones, shingle and gravel with troughs and mounds, piles of pure sand 20 – 30 cm deep for solitary bees and wasps to nest in, small logs, coils of rope and log piles of dry dead wood to provide invertebrate niches (the use of egg-sized pebbles should be avoided because gulls and crows may pick the pebbles up and drop them). Deeper areas of substrate which are at least 20 cm deep are valuable to provide refuges for animals during dry spells. An area of wildflower meadow can also be seeded on the roof for pollinating insects. Please see www.thegreenroofcentre.co.uk and <http://livingroofs.org/> for further information and the following reference: English Nature (2006). Living roofs. ISBN 1 85716 934.4

Small scale living roofs

Please see the following web site:

<http://greenroofshelters.co.uk/make-provide/>

This has examples of ready-made solutions for living roofs on cycle shelters and bin stores as well as on shipping containers including those for on-site storage.

These provide a ready-made solution to the provision of living roofs on site.

I am also forwarding you two emails which contain my pre-app comments for your information although obviously the reference to a PEA being required has now been addressed.

Regards,

Dr. Nick Michael B.A., M.A., Ph.D. (Ecology)
Nature Conservation Officer (Planning)
City Design Group – Growth and Regeneration Directorate

Bristol City Council

Tel. 0117 922 3403 - please contact me by email wherever possible

Email: nicholas.michael@bristol.gov.uk

By Post: City Design Group (City Hall), PO Box 3399, Bristol City Council BS1 9NE

From: Rachel Roberts [<mailto:rachelroberts@tep.uk.com>]

Sent: 20 August 2020 12:46

To: Dr. Nick Michael

Subject: Brislington Meadows - Ecology

Dear Dr Michael

TEP has been appointed on behalf of Homes England to continue with the ecological surveys at the Brislington Meadows site. I have tried to call but thought it would be as well to email.

I wonder if you could please let me know when might be a good time to give you a call to discuss the scope and progress of the surveys? It would also be good to discuss the SNCI and provisions to be made for enhancements (I have been forwarded an email via John Boutwood which suggests BCC is looking to undertake survey, but had no attachments in the chain).

Kind regards
Rachel

Dr Rachel Roberts
Associate Ecologist
TEP

01326 240081 (Direct Dial)
07764 799531 (Mobile)

** PLEASE NOTE MY NORMAL WORKING DAYS ARE MONDAY TO THURSDAY*

The Environment Partnership LTD



Warrington		Gateshead		Market Harborough		London		Cornwall
01925 844004		0191 605 3340		01858 383120		0203 096 6050		01326 240081



How Biodiverse is Greater Manchester?

Our GIS and Ecology teams mapped and scored over 131,000ha across the city to find out!

[>To learn how we did it click here](#)

Please consider the environment before printing this email

Council services: <http://www.bristol.gov.uk/service>

Latest council news: <http://www.bristol.gov.uk/ournews>

Consultations: <http://www.bristol.gov.uk/consult>

Council services: <http://www.bristol.gov.uk/service>

Latest council news: <http://www.bristol.gov.uk/ournews>

Consultations: <http://www.bristol.gov.uk/consult>