

From: development.management@bristol.gov.uk <development.management@bristol.gov.uk>

Sent: 25 March 2025 12:14

To: [REDACTED]

Subject: Consultee Comments for Planning Application 25/10801/PINS

Consultee comments

Dear Sir/Madam,

A consultee has commented on a Planning Application. A summary of the comments is provided below.

Comments were submitted at 25/03/2025 12:14 PM from Nature Conservation (Not Available) on behalf of Nature Conservation Officer.

Application Summary

Reference: 25/10801/PINS

Address: 37 Sandholme Road Bristol BS4 3RP

Proposal: Application for Planning permission for Demolition of existing rear extension and erection of a single storey rear extension; alterations to roof including construction of a rear dormer and change of use of property from a single dwelling to two flats.

Case Officer: Anna Schroeder

[Click for further information](#)

Comments Details

Response Date: 25/03/2025

Summary response: Not acceptable in current format

Detailed Response:

The site is located in an urbanised area and is not within or directly adjacent to any designated wildlife sites or Focus Areas for Nature Recovery within the Local Nature Recovery Strategy.

No ecological information has been provided with the application. A blank BNG Exemption Statement has been submitted without any details provided. This is insufficient.

Comments:

An Ecological Impact Assessment report, proportional to the scale and complexity of the development, should be submitted to inform a decision.

The proposals will impact roof structure, which currently comprise a historic pitched tiled roof with a void. A survey should be undertaken by a suitably qualified ecologist to assess the building for potential roosting opportunities for bats. Depending on the findings of an initial daytime inspection, further bat survey work may be required, such as an emergence (dusk) survey, to determine whether bat species are present within the buildings. Appropriate mitigation measures will need to be provided pre-permission, to enable an informed planning decision. Other protected species and habitats, together with invasive non-native species should also be appropriately considered.

The applicant should provide a completed Biodiversity Net Gain Exemption Statement, which should include details of ecological enhancement measures to be delivered within the proposal, to secure net gains for biodiversity.

If there is an absence of nesting birds and roosting bats within the baseline ecology assessment which has been requested, then an integrated bird box would be an appropriate enhancement measure for a proposal of this size.

If the baseline ecology assessment identifies the presence of roosting bats or nesting birds, mitigation (ie either retention (with appropriate method statement) or replacement) will be required, as well as ecological enhancement(s), to secure 'additionality'.

Reasons:

(a) The Natural Environment and Rural Communities (NERC) Act 2006 (Section 40) obliges the LPA '... in exercising its functions, [to] have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'.

(b) Section 9 of The Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 (as amended).

(c) 10% biodiversity net gain is required under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990, inserted into the 1990 Act by Schedule 14 of the Environment Act 2021.

(d) Ecological enhancement is a requirement of the 2024 National Planning Policy Framework which states that 'Planning policies and decisions should contribute to and enhance the natural and local environment...' Paragraph 192(b)) states that plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

(e) Policy BCS9 of Bristol City Council Local Plan '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'.

(f) Policy DM29 in the Site Allocations and Development Management Policies Local Plan, which states that: 'Proposals for new buildings will be expected to incorporate opportunities for green infrastructure'.

(g) The provision of an average of one nest space per dwelling, on average, in accordance with the BS 42021:2022, and Designing for Biodiversity (RIBA, 2013)

Kind regards