From: Colin Pemble Sent: 14 July 2025 17:07

**To:** Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk> **Subject:** S62A/2025/0105 - Land to the Rear of 9 Priory Road, Clifton, Bristol - Further information

Dear Leanne,

Further to our recent exchange of emails, and in relation to the Biodiversity Net Gain (BNG) requirements, please find attached two documents for your attention:

A BNG Design Stage Report identifying qualifying habitat on site, namely the existing holly tree and areas of bramble scrub, which exceed the exemption threshold.

A completed BNG Metric calculation.

The BNG assessment takes into account the proposed 'living' green roof, as set out in the Heritage, Design and Access Statement. Despite this, there remains a shortfall, which the applicants propose to address through an off-site contribution, secured by a suitably worded planning condition requiring submission and approval of a Biodiversity Gain Plan.

In addition, we note the ecologist's recommendations for on-site BNG enhancements, such as insect hotels and bird boxes, which the applicants are happy to deliver through appropriate conditions.

We would also highlight that a Unilateral Undertaking has been submitted to address the Council's tree replacement policy, providing a financial contribution for off-site planting. We would welcome clarification as to whether both this contribution and the BNG off-site contribution are required, or whether one may offset the other, principally with BNG taking precedence.

We have also reviewed the recent comments and information provided by Bristol City Council's planning officer. It is disappointing these have only emerged at this late stage. Unfortunately, such delays in securing responses on applications submitted to the Council have contributed to the applicants' decision to pursue the s62A route.

For reasons detailed in the submitted Planning Statement, we maintain that — given the central location, the site's relationship to the University of Bristol precinct, and the specific urban context — the proposal would not result in material harm to residential amenity or the character of the area. Consistent with the decision on the adjacent site (rear of 6 Tyndalls Park Road), we believe this site is suitable for HMO use and would not "unduly affect the mix and balance of the local community or undermine the character of the area" (para. 17 of decision ref. S62A/2025/0106).

Finally, we note the planning officer's suggested conditions. We have no

objection to these in principle, though we observe they differ from the conditions imposed in the aforementioned decision. Furthermore, the issue of BNG and ecological mitigation will also need to be accounted for.

Please let me know if any further information is required.

Regards,

Colin

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