



Biodiversity Net Gain

Accreditation

Our work is widely recognised and published for its professionalism and we are full Chartered Members of the following regulatory bodies:



© AvonWorks 2026.

This document has been prepared solely for the purposes of the associated planning application and should be read as a whole.

Information

Project:	Modular Urban Street Furniture
Site Address:	Stapleton Road, St Jude’s, Bristol, BS5 0TA
Client:	The St Jude’s Forum
Doc:	BNG Exemption Note
Status:	For Outline Planning Submission
Revision:	(-)
Revision Date:	14 th June 2026
Report Date:	14 ^h June 2026
Page Count:	29 pp
Word Count:	3540 words

Prepared by:

AvonWorks – on behalf of The St Jude’s Forum

A collective of chartered built-environment professionals and local residents

Contents

- Front Cover	p. 1
- Accreditation	p. 2
- Document Information	p. 3
- Contents	p. 4
- Rear Cover	p. 14

1. Application Details

Proposal

Application for Outline Planning Permission with some matters reserved for the installation of above-ground modular urban street eco-furniture, including green-roof shelter, tree planter, seating, cycle stands, refuse/bin provision, lighting and associated public-realm works. Approval is sought for scale, with all other matters reserved.

Application reference

26/12336/P

Applicant

St Jude’s Forum

Agent:

AvonWorks

Site address

Highways land at Perry Street, Webb Street, Newton Street, Clarke Street, Goodhind Street, Milson Street, Beaumont Street and Stapleton Road, Bristol.

Statement prepared by

Stephen Paradise

MRICS RIBA ARB MCIQB MCABE

AvonWorks, Agent for St Jude’s Forum

Date

14 June 2026

2. Purpose of this statement

This statement is submitted on behalf of St Jude’s Forum in response to Bristol City Council’s invalid application notice dated 11 June 2026. It confirms that the proposed development is exempt from the statutory Biodiversity Net Gain requirement under the de minimis exemption.



The physical development comprises modular street furniture, refuse and recycling provision, shelters, seating, cycle stands, lighting and planters installed upon existing tarmac, asphalt, concrete paving and other sealed highway surfaces. No existing habitat possessing a biodiversity value greater than zero will be removed, damaged or degraded by the development.

3. Exemption relied upon

The application relies upon the statutory exemption for development falling below the de minimis threshold. The exemption applies where development:

1. does not impact any onsite priority habitat;
2. impacts less than 25 square metres of onsite habitat having a biodiversity value greater than zero; and
3. impacts less than 5 metres of onsite linear habitat, including hedgerows or watercourses.

For the purposes of the exemption, development impacts habitat where it causes a decrease in the biodiversity value of that habitat. The proposed development satisfies each of these criteria.

4. Existing Site Conditions

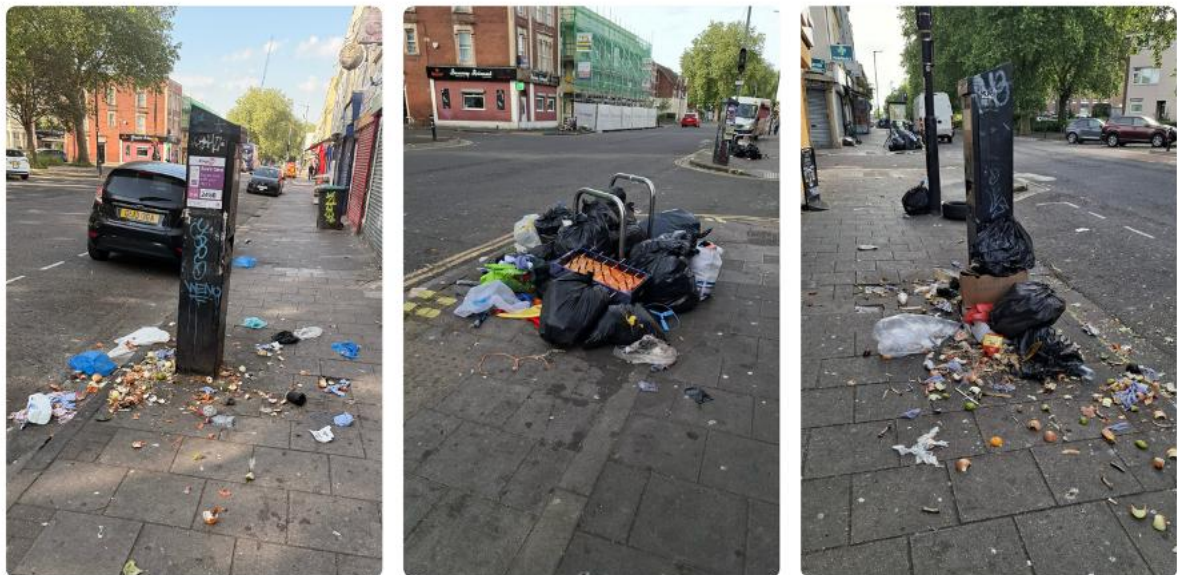
The proposed installation locations comprise existing urban highway and public-realm surfaces, principally:

- tarmac and asphalt carriageway;
- paved footway;
- concrete or paved hardstanding; and
- other existing impermeable or sealed surfaces.

The physical works areas are appropriately characterised under the UK Habitat Classification as:

Urban – Developed land; sealed surface.

These surfaces have zero biodiversity value for the purposes of the statutory biodiversity metric.



Existing street trees, tree pits, planted areas, verges and other vegetated features within or adjoining the wider highway environment are outside the physical works footprint and will be retained. The proposal does not depend upon the removal or degradation of any existing vegetation or habitat.

5. Nature and Extent of the Proposed Works

The proposed development comprises above-ground or surface-mounted public-realm infrastructure, including:

- refuse and recycling stores;
- modular green-roof shelters;
- seating;
- cycle stands;
- tree and planting containers;
- lighting;
- associated street furniture; and
- localised fixings and service connections.

The proposal does not require the clearance, removal, damage or degradation of any:

- priority habitat;
- grassland;
- hedgerow;
- watercourse;
- woodland;
- scrub;
- vegetated verge;
- existing street tree;
- tree pit;
- planted bed; or
- other habitat possessing a biodiversity value greater than zero.

The installations will be positioned entirely upon existing sealed highway or public-realm surfaces. Where localised foundations, fixings or service connections are required, these will also be confined to the existing sealed surface and underlying highway construction.

6. Assessment Against the Exemption Criteria

6.1 Priority habitat

The proposed development will not impact any onsite priority habitat.

Impact on priority habitat: 0 square metres.

6.2 Area Habitat

The physical development footprint is confined to existing sealed surfaces.

No onsite habitat having a biodiversity value greater than zero will be lost, damaged or degraded.

Impact on habitat having a biodiversity value greater than zero: 0 square metres.

6.3 Linear Habitat

The proposal will not remove, damage or degrade any hedgerow, watercourse or other linear habitat.

Impact on onsite linear habitat: 0 metres.

6.4 De minimis threshold

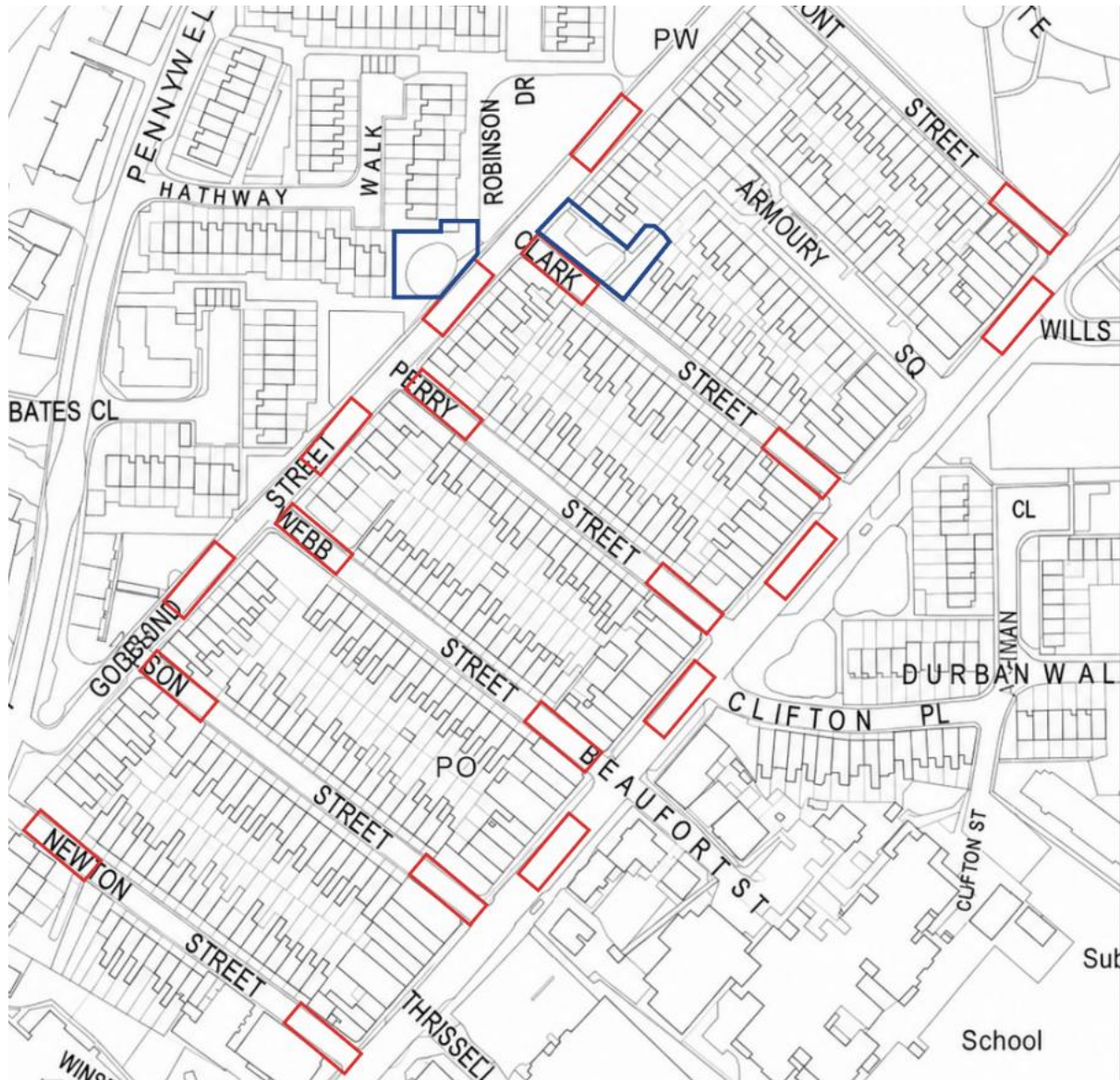
The proposed development:

- impacts no priority habitat;
- impacts less than 25 square metres of onsite habitat having a biodiversity value greater than zero;
- impacts less than 5 metres of onsite linear habitat; and
- causes no decrease in the biodiversity value of the application sites.

The proposal therefore falls within the statutory de minimis exemption, and the biodiversity gain condition does not apply.

7. Application Boundary and Physical Works Footprint

The application relates to a series of locations within the wider public highway. The inclusion of land within an application boundary does not mean that every surface, street tree, verge, tree pit or planted feature within that boundary will be physically affected. For the purposes of the Biodiversity Net Gain assessment, the relevant consideration is the physical development footprint and any adjoining area whose biodiversity value may be decreased by the works.



All proposed installations are confined to existing sealed surfaces. Existing trees, planted areas, verges and other vegetated features within or adjoining the wider application locations will remain unaffected. The proposal therefore causes no habitat loss or degradation, irrespective of the extent of the wider application boundary.

8. Biodiversity Enhancement

Although the proposed development is exempt from mandatory Biodiversity Net Gain, it will introduce new planting and biodiversity-supporting features onto areas that presently comprise sealed surfaces with zero biodiversity value. The proposed enhancements include:

- biodiverse green-roof planting;
- new tree and vegetated planter provision;
- pollinator-supporting planting;
- additional urban greenery;
- new shade and shelter;
- seasonal habitat and foraging opportunities; and
- the retention and protection of existing trees and planted areas.



The precise planting specification, species mix, growing medium and maintenance arrangements will be developed through the reserved-matters and detailed-design process. These measures represent an ecological improvement over the existing sealed-surface condition. They are not proposed as compensation for habitat loss because the development causes no existing habitat loss.

9. Supporting Evidence

This statement should be read alongside:

1. the submitted application location plans;
2. the proposed installation drawings;
3. photographs of the existing locations;
4. aerial imagery showing the existing highway environment; and



The submitted plans and photographic evidence demonstrate that the physical works will take place on tarmac comparable sealed public-realm surfaces.

10. Conclusion

The proposed development consists of modular, predominantly above-ground street furniture installed upon existing sealed highway and public-realm surfaces. It will result in:

- no impact upon priority habitat;
- no impact upon area habitat having a biodiversity value greater than zero;
- no impact upon linear habitat;
- no loss or degradation of existing vegetation; and
- no reduction in the biodiversity value of the application sites.



The development therefore qualifies for the statutory de minimis exemption from Biodiversity Net Gain. A statutory Biodiversity Metric calculation and Biodiversity Gain Plan are consequently not required.



Thank you!