



**22/05714/FB | Expansion of existing cemetery and crematorium to provide new burial and memorial plots with associated roads, footpaths, parking, drainage infrastructure, fencing, landscaping and furniture. | South Bristol Crematorium And Cemetery Bridgwater Road Bristol BS13 7AS**

**Summary**

These comments are in addition to our [preliminary comments](#) dated 21 January 2023 and supplement them. They are made following a detailed analysis of the applicant's Biodiversity 3.1 Metric Calculation (BNG 3.1).

We have mapped the newly defined redline development area together with primary habitat areas affected by the proposal with the proposed attenuation basin and drain routes (Figure 1 below).



*Figure 1: The proposed development area with affected habitats and drainage proposals*

In light of our comments below, we remain opposed to this application in as far as it affects the Colliter's Brook SNCI.



## Our further comments on the BNG 3.1

1. Not all the development area has been included in the BNG 3.1 calculation. The total baseline area is less than the proposed development area which we calculate is approximately 5 ha as opposed to 3.25 ha calculated in the BNG 3.1 calculation. Please provide details of the area of the whole development site and of sites 1, 3 & 4 and adjust the BNG 3.1 calculation areas accordingly.
2. The proposed drain route from area 3 to the attenuation basin passes outside the development area.
3. No allowance is made for the short and long-term impacts of laying drains and the connection points to and from the attenuation basin.
4. No allowance is made for the damage likely to be done to the hedgerows through which the planned drain from Site 1 will pass - especially the possible impact on hedge and tree roots. How will these be protected?

## BNG 3.1 Metric - Proposed habitat creation

### A-2 Site Habitat Creation

5. What is the area of the attenuation basin at its greatest extent? We measure the area up to its maximum water level at about 0.6 ha, not the 0.26 ha used in the BNG 3.1 calculation.
6. Why has a High Distinctiveness, *Temporary lakes, basins and pools* habitat been chosen?

### B-2 Site Hedge Creation

7. Habitat 3 - Line of trees is recorded as 480 m yet to assessor's comment gives 460 m. Which is correct?
8. We note that the Ecology Assessment proposes on and offsite tree planting along the railway line to the north of the development site (see map 3, page 20)<sup>1</sup>, but that this does not form part of the BNG 3.1 calculation.

### D-1 Off-Site Habitat Baseline

We note that the proposed enhancement of habitats off-site will be achieved through grassland restoration elsewhere on the SNCI. It is our case that these sites and habitats must be identified and agreed before this application can be granted.

9. Please identify the location of the 0.49 ha of Mixed scrub and 0.4 ha of Modified grassland habitats within the SNCI.

### D-2 Off Site Habitat Creation

10. Please identify the proposed location of the 0.49 ha of Lowland Meadows within the SNCI. We assume it is intended to replace the 0.49 ha of baseline Mixed Scrub habitat. If this is the case, then this is habitat enhancement, not habitat creation.

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<sup>1</sup> SBCE Ecology Assessment.pdf



## Questions arising

1. Does the applicant commit to achieving at least 10% biodiversity net gain which is compliant with the BNG 3.1 Trading Rules in its application even though, under the current Local Plan, it is not obliged to do so?
2. Have draft ecology and biodiversity Conditions been prepared? If so, please publish these.
3. Has a 30-year habitat and ecology management plan been prepared? If so, please publish this.
4. What long-term funding proposals for the habitat and ecology management plan are proposed?
5. What proposals have been made to allow the tenant unimpeded access the tenanted land both while and after construction works on sites 3 & 4 are undertaken? In particular, how will the tenant be able to access the meadow to the south of site 3?
6. Has the tenant who is farming the land been consulted about the proposed offsite habitat enhancements?
7. Has a methodology for the proposed drain and attenuation basin works been prepared? If so, please publish it.
8. Have detailed drawings for the proposed drain outfall into Colliter's Brook been prepared? If so, please publish these.
9. What work has been done to ensure that the trees growing on the banks of Colliter's Brook will not be adversely affected by the proposed nearby drain and outfall works and installation?
10. Has consideration been given to how the wildlife using Colliter's Brook, in particular otters, will be impacted by these proposed works and what can be done to allow them safe year-round access to the attenuation basin?
11. Will the current outfall from the cemetery adjacent to site 1 be terminated?

We say that the documents requested in questions 2 - 4 above must be agreed before this application can be granted.

**Bristol Tree Forum**  
**16 February 2023**