



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

Further comments

These comments are in addition to our [preliminary comments](#) dated 21 January 2023 and to our [further comments](#) dated 16 February 2023. They are made following a detailed analysis of the applicant's latest Biodiversity 3.1 Metric Calculation (BNG 3.1) dated 6 April 2023.

We remain opposed to this proposal.

Following the Mayor's declaration of an ecological emergency in February 2020, the [One City Ecological Emergency Strategy](#) was published and the Council, in its [Ecological Emergency Action Plan 2021 - 2025](#) and [EEAP update](#), declared its ambition to require that developers achieve at least a 10% biodiversity net gain (BNG) when the biodiversity requirements of the [Environment Act 2021](#) comes into force later this year.

The One City Ecological Emergency Strategy also declared that one of its key strategic goals is to make space for nature by ensuring that least 30% of land in Bristol be managed for the benefit of wildlife by 2030.

We also note that the Council's unanimous 7 September 2021 resolution to protect the Green Belt and Bristol's green spaces (Yew Tree Farm, which uses this land for grazing, is specifically named), included a resolution to '*... call for a halt to the proposed redevelopment of or incursion into any remaining productive wildlife rich agricultural land.*'

Given all this, we are at loss to understand why this application is being brought forward by the Council at all or that, in the face of these BNG declarations, the Council aspires only to achieve a biodiversity net gain of just 2.51% for area habitats¹, which can only be achieved by substituting one offsite habitat with another.

Even if the history above were not enough to show that this application ought to be abandoned, we remain of the view that the Council has still failed to satisfy the requirements of the Local Plan **Site Allocations and Development Management Policies DM17 and DM19**, which state that:

'Proposals which would harm important features such as green hillsides, promontories, ridges, valleys, gorges, areas of substantial tree cover and distinctive manmade landscapes [Urban Landscapes] will not be permitted' - DM17² and,

¹ We accept that Hedgerow habitats show a substantial percentage BNG. However, Rule 4 of BNG 3.1 prohibits Hedgerow Units being 'traded' with area Habitat Units.

² Site Allocations and Development Management Policies - <https://www.bristol.gov.uk/files/documents/2235-site-allocations-bd5605/file> - page 36.



'Development which would have a harmful impact on the nature conservation value of a Site of Nature Conservation Interest will not be permitted' - DM19.³

Our reasons why are set out below.

The loss of biodiversity

Having factored in the technical BNG issues discussed in Appendix 1, we calculate that the current proposals will still result in a loss of 1.58 Habitat Units (HUs) or 5.83% of the onsite area biodiversity yet only achieve an overall net gain for area habitats of just 2.61%.⁴ We have also transcribed this data into the latest version of the [Biodiversity Metric - BNG 4.0](#) - with identical results. A copy of this Metric is submitted with these further comments⁵.

The proposed installation of an attenuation pond at site 4 will result in the least loss of biodiversity of 0.17 HUs or 3.04% of the site's biodiversity. Whilst this might be considered a minor loss, it still amounts to '*a harmful impact*' as defined by DM19.

The creation of a burial ground at site 3 will cover an area of some 1.34 hectares of the SNCI and fall within a '*Steep Sided Valley*' as shown on **Map 4: Valuable urban landscapes within Bristol**. This is protected under DM17 (page 37). Of this, some 16% (0.2138 ha) will be converted into a habitat of no biodiversity value - *Developed land; sealed surface*. It will also require the installation of an extensive network of drainage pipes and related infrastructure which will run between every row of graves. Access paths between the grave rows will also need to be maintained.

Whilst we acknowledge the aspiration to keep the burial ground proposed for site 3 within the SNCI, we do not believe that this is viable given the inevitable repeated disturbance caused by burials and the conflicts caused as a result of its long-term primary purpose - use as a burial ground where people will also want to remember and memorialise their loved-ones.

This may well be phased (depending on the demand for burial plots) over as much as a decade, but it will still result in the inevitable loss of the current habitat which forms this part of the SNCI. This, combined with the change of the site's primary purpose from grazing land to a cemetery, is likely to result in this part of the SNCI no longer meeting the strict criteria by which it was designated. We note that the current cemetery is outside the SNCI even though it surrounds it on three sides and that no other cemetery, save for the historic cemetery at Arnos Vale, is within an SNCI.

As a result, these proposals are contrary to the unequivocal requirements of both DM17 and DM19 and '[must] *not be permitted*'.

We are also sceptical about the proposal to offset the onsite loss with the creation of a

³ Site Allocations and Development Management Policies - page 40.

⁴ We calculate that there is a gain of 87.13% of onsite Hedgerow Units and 107.08% net gain overall for this habitat type.

⁵ This version also seeks to model what additional offsetting might be needed to achieve at least BNG of 10% (discussed towards the end of these comments).



collection of isolated offsite Lowland Meadows habitats. The Ecological Mitigation Proposals state that: *'Scrub control will be repeated on a rolling basis, targeted at areas where grassland restoration has been most successful.'*

The map at Figure 1 below shows all the areas of scrub on the land controlled by the Council. Yet the proposal states that: *'It should be emphasised that the aim of this management is not to remove scrub entirely from the SNCI - the importance of this habitat type for birds in particular is acknowledged - but to return the balance of habitats closer to the state that it was in when the SNCI was originally designated. The historic cores of hedges and their associated trees will not be affected.'*

Is it proposed to remove all of this scrub, or just some of it? We note that some of these areas are within the application Redline area and that some will be lost anyway in order to accommodate the plans for sites 3 and (possibly) site 4 as well as the proposed drain from site 1.

Whatever the answer, the proposed creation of 'islands' of *Lowland meadow* habitat amongst existing grassland habitats does not seem either realistic or practicable. How will these proposals impact the use of the meadows for grazing?



Figure 1 Proposed scrub clearance locations outlined in red

By way of a hypothetical exercise, we have recast the offsite mitigation proposals in order to see what would be required to achieve 10% BNG.



Instead of creating new *Lowland meadows* habitat, we have treated the mitigation as an Enhancement of 0.32 ha of *Mixed scrub* and 0.03 ha of *Other neutral grassland* habitats, both in Poor condition, to *Lowland meadows* habitat in Moderate Condition. This will take eight years to achieve if we assume that the work is advanced by two years and will produce 7.17 HUs with net gain overall of 10.07%. Here are the Headline Results when using BNG 4.0⁶:

South Bristol Cemetery					
Headline Results				Return to results menu	
Scroll down for final results					
On-site baseline	Habitat units	27.12			
	Hedgerow units	5.85			
	Watercourse units	0.00			
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	25.54			
	Hedgerow units	10.95			
	Watercourse units	0.00			
On-site net change <small>(units & percentage)</small>	Habitat units	-1.58	-5.83%	On-site net gain is less than target set	
	Hedgerow units	5.10	87.13%		
	Watercourse units	0.00	0.00%		
Off-site baseline	Habitat units	2.85			
	Hedgerow units	0.00			
	Watercourse units	0.00			
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	7.16			
	Hedgerow units	1.17			
	Watercourse units	0.00			
Off-site net change <small>(units & percentage)</small>	Habitat units	4.31	151.15%		
	Hedgerow units	1.17	0.00%		
	Watercourse units	0.00	0.00%		
Combined net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	2.73			
	Hedgerow units	6.27			
	Watercourse units	0.00			
Spatial risk multiplier (SRM) deductions	Habitat units	0.00			
	Hedgerow units	0.00			
	Watercourse units	0.00			
FINAL RESULTS					
Total net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	2.73			
	Hedgerow units	6.27			
	Watercourse units	0.00			
Total net % change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	10.07%			
	Hedgerow units	107.08%			
	Watercourse units	0.00%			
Trading rules satisfied?	No - Check Trading Summaries ▲				

We are, however, mindful that the Council’s own ecologist has, in another recent planning appeal concerning proposals to develop Brislington Meadows⁷, advised against seeking to offset lost onsite biodiversity by using an offsite SNCI:

'I also considered the biodiversity interest of other areas of land in the vicinity, some of which might be made available to the applicant under the terms of the Land

⁶ The warning re the Trading Rules is caused by the choice of Hedgerow habitat offset - *High Distinctiveness hedgerow with trees* where the like-for-like or better distinctiveness habitat choice is not satisfied. We have not addressed this here.

⁷ <https://www.bristol.gov.uk/residents/planning-and-building-regulations/public-inquiry-for-land-at-broom-hill-brislington-meadows-about-the-inquiry>



Agreement with Bristol City Council. My own survey, supported by the findings of a Bristol City Council survey dating from 2008 (summarised in Appendix 6) show that much of this land is of existing nature conservation interest, as reflected by its inclusion within the SNCI. Due to its existing level of interest this land is unsuitable for biodiversity enhancement.⁸

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⁸ Paragraph 7.5, p. 19 - <https://www.bristol.gov.uk/files/documents/5825-cd13-3-public-inquiry-for-land-at-broom-hill-brislington-meadows/file>

Appendix 1 - Outstanding technical issues

We have mapped the newly defined Redline development area together with primary habitat areas affected by the proposal and with the proposed attenuation basin and drain routes (Figure 2 below). The Council has adjusted its Redline boundary to accommodate the drain route from Area (site) 3 to the attenuation basin.

1. We note that the BNG 3.1 calculation does not make a baseline calculation of all the area within the Redline area. The BNG 3.1 User Guide advises that:

3.2. The biodiversity metric can be applied to on-site and off-site land. These terms are defined below:

- *'On-site' includes all land within the boundary of a project. In a planning context, this usually means within a red line boundary.*
- *'Off-site' is all land outside of the on-site boundary, regardless of ownership.*

3.3. If the project is associated with a planning application, then the baseline would constitute all habitat features found within the red line boundary of the development. The red line boundary should be agreed with the relevant decision maker. (page 21)



Figure 2: The proposed development area with affected habitats and drainage proposals



2. There is a disparity between the baseline habitat areas and those retained, enhanced and created. The baseline area is 3.2651 hectares, whereas the new habitats total 3.1674 hectares - a difference of 0.0977 hectares. This table shows the differences broken by site:

Area / Site (ha)	BNG 3.1 Area Analysis						
	Baseline Area	Retained Area	Enhanced Area	Created Area	New Area	Balance Area	% Change
1	1.3363	0.5300	0.5800	0.1548	1.2648	-0.0715	-5.35%
3	1.3338	1.1200	0.0000	0.1984	1.3184	-0.0154	-1.15%
4	0.5950	0.0000	0.0000	0.5842	0.5842	-0.0108	-1.82%
Totals	3.2651	1.6500	0.5800	0.9374	3.1674	-0.0977	-2.99%

3. We have corrected these anomalies by allocating the shortfall to the *Developed land; sealed surface* habitat in sites 1 & 3. These corrections make no difference to the overall BNG calculation as they are allocated no habitat value. For site 4, we allocated the difference to *Other neutral grassland* habitat. This change is marginal as it has added only 0.0108 hectares to this habitat. This table shows the corrections made, together with the offsite habitat areas added:

Area / Site (ha)	Corrected BNG 3.1 Area Analysis				
	Baseline Area	Retained Area	Enhanced Area	Created Area	New Area
1	1.3363	0.5300	0.5800	0.2263	1.3363
3	1.3338	1.1200	0.0000	0.2138	1.3338
4	0.5950	0.0000	0.0000	0.5950	0.5950
Sub-Totals	3.2651	1.6500	0.5800	1.0351	3.2651
Offsite Habitat	0.4900	0.0000	0.0000	0.4900	0.4900
Totals	3.7551	1.6500	0.5800	1.5251	3.7551

4. Some of the broad *Grassland* and *Heathland and shrub* habitats baseline habitat conditions have been assessed as *Fairly Poor* or *Fairly Good*. As the BNG 3.1 Technical Supplement document only allows these to be assessed as *Good*, *Moderate* or *Poor*, we have reassigned these habitats from *Fairly Poor* to *Moderate* and from *Fairly Good* to *Good*.
5. Treating the new offsite *Lowland meadows* habitat as having been created five years in advance of the proposed development of site 3 does not, we believe, model the proposal properly, especially as the work on the burial ground proposed in site 3 will be phased over at least a decade. By way of compromise, we have allowed for the habitat to have been



created two years in advance.

6. We remain concerned that the farmer grazing the land will have limited or no access to the pasture around and beyond the attenuation pond and to the south of site 3 and that the passage of cattle through narrow 'pinch points' there will damage pasture or the PROW.
7. What proposals are being made to close or redirect the PROW while these proposed works are being completed?