



Statement to DCC A - 06 September 2023

**22/05714/FB | South Bristol Crematorium And Cemetery Bridgwater Road Bristol BS13 7AS**

The proposed cemetery extension into Areas 3 & 4 and the proposed linking drainage associated with these proposals are in an **Urban Landscape - Prominent Green Hillside** - and within the **Colliter's Brook Site of Nature Conservation Interest (SNCI)**. These two Local Plan designations are protected by [Site Allocations and Development Management Policies](#) DM17 and DM19, which state:

DM17: *'Proposals which would harm important features such as green hillsides, promontories, ridges, valleys, gorges, areas of substantial tree cover and distinctive manmade landscapes will not be permitted.'* - pages 36/37.

DM19: *'Development which would have a harmful impact on the nature conservation value of a Site of Nature Conservation Interest will not be permitted.'* - page 40.

The passages from DM19, which the officer quotes in his report - at 10.15 to 10.17 - ignore the express prohibition relating to SNCIs quoted above. This overrides the more generic policy quoted. The prohibitions in both DM17 and DM19 are absolute - 'will not be permitted'. They are not conditional, nor is a minimum level of harm permitted, nor the degree of post-harm mitigation relevant.

The evidence produced by the applicant, including its ecological evidence, shows that the proposed development of these two areas will be harmful: fencing will be erected, drains will be installed, an attenuation pond will be excavated, and, in due course, graves will be excavated and those buried there will be visited and, perhaps, memorialised.

We accept that burials may not start in Area 3 for some years and that there are proposals to mitigate this harm. However, harm will still be caused both to the Urban Landscape and to the SNCI, both immediately and in the long term. This is not permitted.

The [NPPF](#) at paragraph 179 b) requires that plans should *'identify and pursue opportunities for securing measurable net gains for biodiversity.'* This is echoed by BCS9, which states: *'...Loss of green infrastructure will only be acceptable where it is allowed for as part of an adopted Development Plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy ...'*

The applicant's plans will also result in a net loss of **6.75%** of area habitat units. To compensate for this loss, it is proposed to provide offsite BNG in other parts of the SNCI outside the development area. The Council's ecologist has, in a [recent planning appeal](#) (paragraph 7.5, p. 19), advised against seeking to offset lost onsite biodiversity by using an offsite SNCI: *'Due to its existing level of interest this land [the SNCI] is unsuitable for biodiversity enhancement.'* This loss of BNG also amounts to 'a harmful impact' which DM19, as it relates to SNCIs, does not permit.

Accordingly, this committee is obliged to refuse this application under the NPPF, BCS9, DM17 & DM19. We urge the committee to read our detailed objections to this application:

1. [First comments](#)
2. [Second comments](#)
3. [Third comments](#)
4. [Fourth comments](#) (with proposed Conditions if application approved - Annex 4).