

Public Forum

D C Committee B

29 November 2023



1. Members of the Development Control Committee B

Councillors: Ani Stafford-Townsend (Chair), Lesley Alexander, Amal Ali, Fabian Breckels, Sarah Classick, Lorraine Francis, Katja Hornchen, Guy Poultney, Chris Windows.

2. Officers:

Simone Harding, Phillipa Howson, John Smith, DSO



Questions

No.	Speaking (S)	Name
22/05714/FB – South Bristol Crematorium and Cemetery		
1	S	Mark Ashdown
2		Danica Priest
3	S	Sid Ryan
4	S	John Tarlton

Statements

No.	Speaking (S)	Name
22/05714/FB – South Bristol Crematorium and Cemetery		
1		Hilary Rydon
2	S	Sally Withers
3		Chris Rose
4		Tim Marriner
5		Lisa Cole
6		Mark Hayward Jenks
7		Diane Jenkins
8		T Garton
9		Carole Humphreys
10		Paul Becker
11		Julie Brannan
12		Jason Picton
13		Gary Hunt
14		Mark Jenkins
15		Deborah Sharp
16		Bonnie Welch
17		Rebecca Smart
18		Nikki Dodd
19	S	Elizabeth Withers (<u>Sally Withers</u> to speak)
20		Val & John Shepstone
21		Jordana Davarian-Cross
22		George Cook
23		P Becker

24		Rhona Cockle	
25		Matthew Morse	
26		Matthew Davies	
27		Shahid Akram - Ummah Funerals Ltd - MD	
28		Tracy Anderson	
29		Rebecca Bell	
30		Lauren Duston	
31		Toby Baker	
32		Vicki Holman	
33		Teresa Tremlett	
34		Mel Osborne	
35		Jasmine Beard	
36		L Colledge	
37		David Campbell	
38		Jennifer Padfield	
39		Mr Johnson	
40		Fiona Cresswell	
41		Mike Brown	
42		Fiona Evans	
43		Styx Steel	
44	S	Mark Ashdown - Bristol Tree Forum	
45		Paul Hobbs	
46	S	John Tarlton – Bristol Tree Forum	
47		Ayden Walters	
48		Helen Russell	
49		Joe Beard	
50		Suzanne Audrey	
51		Katie Milne	
52		Joshua Roberts	
53		Matt Jarvis	
54	S	Bristol Tree Forum – M Ashdown or J Tarlton	
55	S	Danica Priest	
56		C Roest-Ellis	
57		A Hughes	
58	S	Catherine Withers	
59		Ben & Becky Penrose	
60	S	Nasim Dumont	
61		Julia Round	
62		Karen John	
63		Yvonne Ellis	
64		Lizzie Stephens	
65		Mike Oldreive	

66		Sascha Roest-Ellis	
67	S	Patsy Mellor Director: Management of Place	
68	S	Rupert Higgins (<u>Oliver Roberts</u> speaking to this)	
69	S	Ian Barrett Avon Wildlife Trust	
70	S	Sid Ryan	
71		Cllr Christine Townsend	
72		Cllr Emma Edwards	
73		James Holland	
74		John Beard	
75	S	Dan Ackroyd	

1

Yew Tree Farm - Planning Meeting 29th Nov

Dear Sir/Madam

I object to the plans to expand the cemetery onto this land for several reasons:-

It is Bristol's last working farm and the the land is needed in order to make the farm viable.

It is an SNCI and should be protected.

Bristol City Council declared an Ecological Emergency in 2020 in order to protect wildlife and nature.

The Council's own Green Motion was voted in Sept 2021 to protect green spaces and prioritise developing brown field sites.

There are other suitable sites that can be used for the crematorium expansion.

Avon Wildlife Trust have strongly objected to this proposal on the grounds that a valuable wildlife habitat will be destroyed.

A new species of fly has been discovered on the farm, so this habitat needs to be preserved.

It is a well loved green space where people can connect and enjoy nature which improves their mental health. Green prescribing is now recommended by the NHS & Dr Amir Khan advocates this on behalf of the Wildlife Trusts.

Allowing this expansion to happen would mean no SNCI in Bristol would be safe from developers in the future.

Please make the right decision and refuse this application for the above reasons.

Regards

Hilary Rydon

2

Service Director

Dear chair. And committee members

Planning 22/05714/FB Bristol crematorium

Committee stated after last planning meeting, was Yew Tree Farm was their biggest concern.

I would like to inform you Gerald Withers is the owner of Yew tree Farm, he and his daughter Elizabeth Withers farm the land at Yew Tree Farm, they own and look after the cattle that graze the ground.

This is just one of the farms he owns.

They have always been aware of the eventual planning expansion, and that said the expansion will have No EFFECT on his farming business.

I suggest further communication regarding Yew Tree Farm should be directed to G R Withers Chestnut Farm.

Farmers rely on renting ground short term, long term, and for generations, but if we rent it, we don't own it and we definitely should not have the last say on what happens to it. Who will rent us ground if you set a precedent and allow entitlement to win you over.

Sally Withers

Committee B: 29/11/2023

Response To Questions

John Tarlton

Comparing the current (2014) Local Plan policy on SNCIs with the draft (2023) Local Plan, the Planning Office asserts that the new plan:

states that development should be refused if it has a ‘significantly harmful impact on local wildlife, comprising Sites of Nature Conservation Interest (SNCIs)’. This is a change from the current policy which suggests a refusal if there is any harm to the SNCI.

So, despite the declarations of Climate and Ecological Emergencies, the planning office has interpreted the wording in the new Local Plan as a loss of protection for SNCIs.

Will the planning office continue to make this interpretation for the 15 year duration of the plan?

If so, the committee should be aware of this reduction in protection for nature in the new Local Plan and also that this is just one of many such examples where protection of important natural assets has been weakened. We suggest that Members should consult with their colleague on the Local Plan Working Group to ensure that the new Local Plan strengthens protection for our already critically depleted nature rather than weakens it.
Professor John Tarlton (Bristol Tree Forum)

Response

The emerging local plan will continue to give appropriate protection to Sites of Nature Conservation Interest in accordance with the approach set out in the National Planning Policy Framework. Emerging Policy BG2 reflects the NPPF’s wording in paragraph 180 [*“When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”*]. The NPPF is already a material consideration in determining the application,

The emerging local plan has been published for representations. Any representations regarding this policy or other policies will be considered by the planning inspector who examines the local plan following its submission to the secretary of state.

Danica Priest

1. Can you confirm that the conditions in the ecological mitigation proposal document need to be adhered to in order to maintain the SNCI status?
2. One of the conditions in the ecological mitigation proposal document is:

“3.4 Restrict memorialisation to a small stone and a container for flowers. Explain rationale to plot holders and remove any surplus material.”

Has the council considered any equalities concerns arising from members of certain faiths being unable to leave tokens of remembrance that don't fit with the strict planning conditions especially considering the existing burial plots are covered with plastic memorials?

3. What dates were the most recent species surveys conducted for the following species:

Bats

Dormice

Harvest mice

Invertebrates

Badgers

Slow worms

(note: species surveys not habitat surveys)

Response.

1. The recommendation secures that a Landscape and Ecological Management Plan needs to be approved by the local planning authority, which secures the ecological mitigation proposals in detail. As such the Landscape and Ecological Management Plan at present sets out all the key areas which need to be addressed to the satisfaction of BCC's ecologist. This will be secured by recommended condition 2.
2. An assessment will need to be made on a case by case basis.
3. The presence of identified species was recorded for each survey and included in section 3 of the 2022 report. In summary the report identifies that the last site survey was carried out on 27th June 2022, following earlier surveys carried out on 29th November 2019, 12th June 2020, 18th June 2020 and 10th September 2020. The surveys covered vegetation types and both vascular and lower plants; insects; and birds; included checks for badger setts and other signs of badger activity; and assessed habitat quality for other protected species, to inform the requirement for any additional species surveys. For this, additional bat species surveys were undertaken, with trees checked using binoculars as necessary, for holes, crevices and dense growths of ivy that might support roosting bats alongside additional bat activity surveys being carried out over the summer of 2020 for Area 1 and the existing Cemetery and a further extended bat activity survey focused on Site 3 in Summer 2022.

Sid Ryan

Could I please clarify some of the timeline of this application as the consultation process and the search for alternative cemetery sites seems contradictory to events.

As part of the FOI request to BCC and this committee, for which I'm grateful, I requested the contract or specification for BCC's ecologist on this project. The contract for the ecology

work forming the core of this application was issued in October 2019 and work began within a month. The contract says the extent of site works and infrastructure, full business case and budget were to be developed for Cabinet in March 2020.

The pandemic may have caused delays, but it seems safe to say project scope for what has become Bristol's entire burials strategy - developing into Yew Tree Farm - was determined before any of that in late 2019 and early 2020. So I don't understand why we're discussing a consultation process and the search for alternative cemetery sites in 2021 and 2022.

When asked to explain consultation with Yew Tree Farm in the 'Supplemental Information' says first that Catherine's statement that she was 'excluded from being a stakeholder' is 'not representative' and then says boldly that she was the 'first stakeholder engaged', in May 2021. This is 18 months after preparatory ecology works began and over a year since development of the full business case.

Similarly, when discussing searches for alternative burial sites the officers report talks about no new plots being available since 2020/21, and a process of ranking sites in North Bristol between 2020 and 2022, which found nothing suitable immediately available. None of that relates to South Bristol, and none of that occurred before expansion at South Bristol was decided in late 2019 and early 2020.

In that context:

- How has the applicant ensured that it has given the 'considerable importance and weight' and 'clear and convincing justification' to harms to the local heritage asset given that it did not meet with the owner and hear what those harms might be until a year after the business case was developed?
- Is it correct to summarise the officers report as saying that - at the point it was decided to expand South Bristol Cemetery in late 2019 and early 2020 - the applicant had only considered alternative burial sites adjacent to existing cemeteries in South Bristol, and has still not considered other land it owns in South Bristol, or purchase of any new site in any part of the city for a cemetery which will clearly be needed once what is formerly Yew Tree farm is full.

Response.

For planning timelines, the applicant submitted an application for a Lawful Development Certificate in August 2021, which was withdrawn in July 2022, with a full planning application being submitted in November 2022. The information on stakeholder engagement provided by the applicant identifies that engagement activity commenced 18 months prior to the full planning application being submitted.

The case officer report identifies that there would be no harm to heritage assets.

Consideration of other sites is contained within Key Issue A of the Case Officer report, and can be seen in detail in the statement from the applicant from 10th November 2023. In short the consideration was limited to those sites that could be practically, viably and realistically brought forward. There is no planning policy requirement to consider other sites.

Mark Ashdown

Question 1:

Last time this matter was before this committee, the Chief Planning Officer advised it that the definition of 'harm' meant 'net harm'. Does the Chief Planning Officer still stand by this advice?

Response

A: Yes. The application needs to be considered as a whole. Where any negative impacts are low level, temporary and overcome by positive management that ensures the specific nature conservation features for which the site is designated are being maintained, then this does not constitute a breach of DM19. The crucial additional clarification to highlight, is that to be in alignment with this policy it is NOT the overall biodiversity gain that is determinative. There rather needs to be an assessment that establishes whether there is harm with reference to the specific characteristics that make the site special. As set out in para 4.21 of the report to committee: "It is the view of the Council's ecologist that the proposed management strategy is critical to the acceptability of the development and will ensure that the features of the site which led to it being designated as an SNCI will be maintained and enhanced such that it continues to function as an SNCI". It is on this basis that the proposal complies with policy DM19.

Question 2:

If so, what does the Chief Planning Officer mean by the term 'net harm'?

Response

As set out above in the first 2 sentences. Specifically note the ecologist's view that the proposed management measures will maintain *and enhance* the site's ability to function as an SNCI.

Dear Bristol Councillors

Please recognize the value that Yew Tree Farm has for nature and the benefits it brings to the people of Bristol, and reject the proposal for a crematorium expansion.

Yours truly,

Chris Rose

Dear Sir/Madam,

With reference to the above-mentioning application, this is a poorly-thought out expansion and disgraceful act of further environmental destruction.

No other sites have been assessed or even considered - because Bristol City Council yet again only see the easy route of destroying an SNCI and destroying the livelihood of our last remaining farm, thus impoverishing the environment around this site as well.

There are innumerable 'wasteland' low-use Council-owned sites in nearby Hartcliffe & Whitchurch that could be converted and would support those local communities far more than destruction of an SNCI.

I would like to draw attention to objections raised by both Bristol Tree Forum and Avon Wildlife Trust with regard to impact on the SNCI, also the statement regarding mitigation made by the Nature Conservation Officer that "the purpose is to restore grassland lost to scrub" - the 'scrub' mentioned is actually a major component of the SNCI habitat.

Natural England's publication on Scrub Management contains the following paragraph:

12.1.3 Conservation evaluation

Before taking decisions about scrub management it is important to assess the conservation value of the scrub habitat.

Scrub can be the most important habitat type on the site and be of national scientific interest, alternatively it may have a negative conservation value because, if allowed to develop further by spread or canopy closure, it would exclude important grassland plants and add little of significance to the flora and fauna of the site in return.

Many areas of scrub are of intermediate importance, add to the diversity of the site through the presence of a range of shrub species and other associated plants and animals (see also sections 12.2 and 12.3).

It does not appear that a full ecological survey of the site has taken place.

I fully object to this expansion and request that it be refused.

Regards,

Tim Marriner

To Whom It May Concern

I am writing to object to the crematorium expansion and any other building work that involves the removal of hedgerows or trees from Yew Tree Farm.

It is a Site of Conservation Nature Interest and that should be protected. There are protected species on the site which makes this a matter of material consideration. It is important to keep the site as it is because of the wildlife on there and also because it provides a linkage for wildlife, so building on it would reduce protected species from a much larger area.

The current farmer works with the wildlife and has done a great deal to improve habitats for at risk species. Building on the site would be short sighted and risk far too much.

Lisa Cole,

Subject: Objection re yew tree farm

To: Democratic Services <democratic.services@bristol.gov.uk>

- This site is in the greenbelt
- No other burial land options have been explored
- The site is an SSSI (site of nature conservation interest) and therefore should not be touched according to policy DM19
- Bristol city council passed a motion in sept 2021 that said our greenbelt and nature rich green sites should be protected. Passing this would violate the green spaces motion
- There are veteran trees that would be damaged to the point of death
- This is a beloved site of recreation for residents
- This would put Yew Tree Farm out of business
- This is against our climate and ecological emergency.

The world is on fire. You should be making every effort to save the farm and precious spaces like it , not destroying them.

Subject: My objection to yew tree farm development

- This site is in the greenbelt

- other burial land options have not been explored

- The site is an SNCI (site of nature conservation interest) and therefore should be subject to policy DM19 and left untouched.

- Bristol city council passed a motion in sept 2021 that said our greenbelt and nature rich green sites should be protected. Passing this would contravene this motion.

- There are beautiful veteran trees, 'king of limbs' that would be damaged and quite possibly critically .

- This is a site of recreation for residents and is cherished by them.

- Yew Tree Farm would be put out of business

- we are in a climate and ecological emergency. Act commensurately with the crisis we are all in and leave beloved site as it is.

- It would be a symbolic desecration of something that should be preserved and celebrated. If destroyed it is irreplaceable .

To whom it may concern

I wish to register my vociferous objection to the proposed use of Yew Tree farmland for expansion to the crematorium.

If it should go ahead it will prove beyond doubt that Bristol City Council has no concern for biodiversity, green space and the protection of wild spaces for future generations. The ecological value of the land and the importance of maintaining a viable working farm is incontrovertible. There is no justification for continuing with the land grab and destroying important natural space and wildlife habitat, and local people's' livelihood.

T Garton

Please consider the environmental impact of destroying such a wonderful farm. Gone means forever. Surely there is a brown site that could be found. We are losing far to much nature. Enough is enough . Please save Yew tree farm .

Kind regards C Humphreys

I still object to this application. SNCIs and local food production should be prioritised in a climate crisis.

Paul Becker

Dear sirs

I am writing to object to the expansion of the crematorium by taking away land that has been used by Yew Tree Farm, Bristol's last working farm. Yew Tree Farm, designated as an SNCI, operates traditional farming practices and as such is vitally important for nature, which has such a positive impact on biodiversity and therefore contributes to reducing climate change. Without it, it will be harder for Bristol council to meet its climate change objectives. However urgent you may think it is to allocate extra land for the crematorium, it makes no sense to use land which has been identified as a site of nature conservation.

I therefore object to the expansion of the crematorium onto this land.

Yours sincerely

Julie Brannan

Please except this as my statement, to object to the crematorium expansion, onto the land grazed my yew tree farm. The site is a SNCI and mitigating against harm. Has not been proved and makes no sense.

We understand no other sites have been investigated and this will cause the reduction in grazing land this will be another blow! THIS IS BRISTOLS LAST FARM

Regards
Jason Picton

Ref Expansion of Bristol crematorium into lane currently forming part of Yew tree farm

To whom it may concern

I urge you to consider the negative impact on people and nature of the local area as a result of proposals that may lead to the closure of yew tree farm. Key considerations must include:

- impact on physical and mental health of the local community. The land of yew tree farm is an area commonly used by walkers and runners for exercise that contributes to improved health in both aspects
- impact on nature. The land of yew tree farm is a designated SSSI
- impact on education, history and sustainability . The operation of yew tree farm is important to the preservation of historic and future farming, providing education opportunities to all visitors of a key UK industry and leading the way in environmentally appropriate and sustainable food production and supply
- impact on business. Yew tree farm contributes to the local economy through its farming, farm shop and attendance at local markets. Catherine also supports local business networks individually

Sincerely
Gary Hunt

This application is entirely unsuitable as many others have written in details and with great eloquence.

Quite why this is such a priority for this administration is difficult to fathom.

Such wanton vandalism , pursued with a strange fervour by a dying administration should be resisted by calmer heads on the council.

Do the right thing and protect the farm.

Mark jenkins

Dear Bristol City Council,

I am writing to you to ask that Yew Tree Farm is safeguarded from development and that alternative solutions are found for the expansion of the crematorium. I write from the perspective of someone who, as a member of the University of Bristol and the College of Medicine, has recently had the privilege of delivering a Green Social Prescribing project at Yew Tree Farm for patients registered with Bristol general practices. As a GP for many years in the city, I have been able to see at first hand just how much benefit patients get from their visits. Much more than I was often able to provide from pills or long hospital waiting lists.

We have been working closely with Catherine Withers at Yew Tree Farm for the past two years, delivering a green social prescribing project at the farm – the first of its kind. In partnership with the Sustainable Food Trust, we have worked with Primary Care Networks across Bristol, enabling a wide range of patients (including those suffering bereavement as well as mental and physical health challenges), to visit Yew Tree Farm for on-farm activities that aim to improve health and wellbeing. Our evaluation, which I'd be happy to share with you, proves the incredibly positive impact that the farm has on individuals from across Bristol.

I know that the farm has enormous support from the local community as well as many wildlife, food and farming organisations who understand the value of Bristol's last working farm – not just in terms of its production of high-quality, nutritious food, but the numerous benefits it provides in terms of climate, nature and the health of the local community. Many of these positive externalities are yet un-costed, however should be considered 'public goods' and a vital part of the solution to our climate, nature, and public health crises.

I am sure you are aware that the farm now forms part of Bristol's newest SNCI – Site of Nature Conservation Interest – and last year an insect (as yet unknown to science) was discovered in the meadow. The farm is organic, nature rich and wildlife friendly, and produces nutritious, health-promoting food for the local community. Much of the landscape has been rewilded, and the farm is home to over 40 species of bird and 20 species of mammal. The site includes a natural hay meadow with over 90 plant and grass species, as well as permanent pasture for the cattle. There are several hundred mature trees, copses, woodland and hedgerows – all within Bristol's city boundary which makes Yew Tree Farm unique.

I am also aware of the commitments Bristol City Council has made to improving its local food infrastructure, as set out in [*Bristol Good Food 2030: A One City*](#)

Framework for Action, which aims to transform the city's food system within this decade, supporting its ambitions on health, climate, biodiversity and social justice. There are also 86 references to food in the *Local Plan Review*, which states: "Since the last local plan was agreed in 2014, we now include new policies on biodiversity and proposed changes of approach at sites such as the Western Slopes, Brislington Meadows and Yew Tree Farm that aim to give priority to nature conservation and food growing. Ecology and sustainability are key to a climate resilient city."

As BCC has publicly acknowledged, Yew Tree Farm offers immense benefits to the Bristol community – enhancing and restoring biodiversity, mitigating flood risk, sequestering carbon, offering climate resilience, providing nutrient-dense and healthy food, and green space for public footpath users and community groups, such as our green social prescribing participants. Considering these benefits, and as Bristol's last working farm, I believe the community would be outraged if it were to be lost. I therefore hope you will ensure that the entire farm is protected.

I'd be happy to engage further on this matter,

Yours sincerely

Deborah J Sharp BA MA BM BCh PhD FRCGP OBE
Professor of Primary Health Care
University of Bristol

Dear Bristol City Council,

I am writing to you as a representative of The Sustainable Food Trust in support of the safeguarding of Yew Tree Farm, as I have been made aware that it is currently under threat from the possible expansion of the cemetery and crematorium land.

We have been working closely with Catherine Withers at Yew Tree Farm for the past two years, delivering a green social prescribing project at the farm – the first of its kind. In partnership with the College of Medicine and the University of Bristol, we have worked with Primary Care Networks across Bristol, enabling a wide range of patients (including those suffering bereavement as well as mental and physical health challenges), to visit Yew Tree Farm for on-farm activities that aim to improve health and wellbeing. Our evaluation, which I'd be happy to share with you, proves the incredibly positive impact that the farm has on individuals from across Bristol.

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I am sure you are aware that the farm now forms part of Bristol's newest SNCI – Site of Nature Conservation Interest – and last year an insect (as yet unknown to science) was discovered in the meadow. The farm is organic, nature rich and wildlife friendly, and produces nutritious, health-promoting food for the local community. Much of the landscape has been rewilded, and the farm is home to over 40 species of bird and 20 species of mammal. The site includes a natural hay meadow with over 90 plant and grass species, as well as permanent pasture for the cattle. There are several hundred mature trees, copses, woodland and hedgerows – all within Bristol's city boundary which makes Yew Tree unique.

As a Bristol resident, I am also aware of the commitments Bristol City Council has made to improving its local food infrastructure, as set out in *Bristol Good Food 2030: A One City Framework for Action*, which aims to transform the city's food system within this decade, supporting its ambitions on health, climate, biodiversity and social justice. There are also 86 references to food in the [Local Plan Review](#), which states: "Since the last local plan was agreed in 2014, we now include new

policies on biodiversity and proposes changes of approach at sites such as the Western Slopes, Brislington Meadows and Yew Tree Farm that aim to give priority to nature conservation and food growing. Ecology and sustainability are key to a climate resilient city.”

As BCC has publicly acknowledged, Yew Tree Farm offers immense benefits to the Bristol community – enhancing and restoring biodiversity, mitigating flood risk, sequestering carbon, offering climate resilience, providing nutrient-dense and healthy food, and green space for public footpath users and community groups, such as our green social prescribing participants. Considering these benefits, and as Bristol’s last working farm, I believe the community would be outraged if it were to be lost. I therefore hope you will ensure that the entire farm is protected.

Thank you for taking the time to read this.

With kind regards,

Bonnie Welch
Sustainable Food Trust

To whom it may concern at Bristol planning department.

Please do not build over any part of Yew Tree Farm in Bristol.

We are in a Climate & Nature crises because of over-development like this. Declared locally and nationally - a decision to approve the planning application would be in contravention of this & of the Climate Change Act.

Voters are waking up, and the next time they are asked to vote, all councillor and MP names will be publicly exposed on their voting position for Nature !

There is also a law developing for Ecocide as a charge as well.

We will make sure this goes to the national media / social media and will crowdfund for legal representation from Lawyers for Nature if you do not make the right decision for Nature & the community and turn down this ruinous planning application.

Best wishes,
Beccy

Subject: Objection to the proposed expansion of South Bristol Crematorium
Application number: 20/05714/FB

The expansion of the South Bristol Crematorium would have a harmful impact on the SNCI. As such, this application is in direct contradiction to DM19, which states that: "Development which would have a harmful impact on the nature conservation value of a SNCI will not be permitted." To go forward with this application under the pretense that the harm can be mitigated would set a dangerous precedent. It would embolden developers to go after other SNCIs - and essentially make this conservation status meaningless.

Biodiversity is declining across the country, in large part due to development and habitat loss. Approving this application would also threaten the viability of Yew Tree Farm, which is a cherished local gem, and a model for wildlife-friendly farming. I urge the council to consider the long term implications of their decision and reject this application.

To control meeting B 22/05714/FB

I would like this statement to be read out at the meeting on the 29 th of November concerning the expansion of south Bristol crematorium.

I farm in partnership with my father Gerald Withers and we are the owners of the cattle grazing at Yew Tree Farm I'd like just to confirm a few things .

Yew tree farm has never been a small self supporting farm in the last 60 years , our family has farmed it in conjunction with other farms owned and rented in North Somerset , Yew tree farm only represents about 10% of our farming enterprises .

We have farmed your fields since the 1980 's and they have been registered with the RPA as being used by us since the 1990 's under the holding number 34/628/0213 and linked to our main holding 34/616/0225 , I'll can send documents to confirm this .

We have always known that your land has been kept for future expansion of south Bristol crematorium, and do not have a problem with this , as it isn't our land .

We would be happy to continue using the land you don't need for the expansion .

I think it would be a good idea to start clearing the scrub bushes etc , if this is not done soon there will not be a lot of grazing area left for the cattle.

If you need any further information please let me know .

Thanks Elizabeth Withers

Dear Sirs

As members of the local community living in Donald Road, BS13 7BU - we wish to object to the plans to expand the crematorium as per 22/05714/FB as this will make Yew Tree Farm unviable, will kill mature trees and build over an SSCI.

Yours faithfully

Valerie and John Shepstone

To whom it may concern,

I know the matter of Yew Tree Farm is due to be discussed this week. I am a resident of Bristol and could not disagree more with the council plans to expand the crematorium. The farm is the last in the city limits, it is steeped in history, it houses much wild life and is a beautiful green space to be enjoyed by Bristolians.

I do not support the plans to expand the crematorium and I think BCC should be ashamed of their destruction of the green belt.

Sincerely,

Jordana Davarian-Cross

Dear BCC,

I am writing to you today to express my feelings about Yew Tree Farm and the expansion of the crematorium that will threaten the existence of the farm and the wildlife that live there.

To damage a Site of Nature Conservation Interest should be a very last resort for any development especially for a council that has self proclaimed to be one that is so caring for the environment. You yourselves have declared a climate and ecological emergency. I want you to start acting as if you believe that. We do not have time to damage habitats and mitigate by hoping the habitat will recover in the near future. 1 in 6 species in the UK are at risk of extinction. We need drastic action now and trashing the high quality habitats we have is a huge leap in the wrong direction.

I lived by the farm for 3 years and the access to green and natural space was a lifeline during lockdown. I have seen bullfinch, barn owls, dipper, kingfisher, badgers, foxes and sparrowhawk all use the farm. I have also seen siskin, a bird I have not seen anywhere else in Bristol or anywhere in Avon. Otters have also been recorded on site. The farm is a vital link between the city and the wider countryside, linking inti long ashton, ashton court and beyond. The impact to this site will be felt across the landscape and its fragmentation will damage wildlife on a large scale.

Yew Tree Farm is an opportunity to showcase to city and country that you can farm, protect wildlife and provide green spaces for humans to enjoy all in the one site and Bristol should feel proud there is still site like this in the city. Instead the council seems to be blundering its way to making the farm no longer viable.

I hope you can, hand on heart, feel that you are all making the right decision for bristolians now and into the future and whether further destroying nature, especially important, high quality sites, for the sake of a burial ground to be the correct, longterm decision. I, like many others, strongly believe this is the wrong choice and I want you to look for better places for burial sites in or out of the city.

Please reconsider and take you own promises of addressing the climate and ecological emergency seriously.

Regards,
George Cook

Without quoting all the arguments already made, I would just say no development should be allowed on areas designated SNCI. I think the actions of the Council regarding this site should be challenged and appropriate action taken.

P Becker

Ref : Application No. 20/05714/FB

Dear Sirs

As a resident of South Bristol I object to the expansion of burial plots at South Bristol Cremation. Whilst I understand a need for more burial plots I feel the site should not grow bigger. Have other sights been considered ?

My main concern is the ecological impact to the wild life corridor plus its inside the green belt which should be kept for the future of Bristol. Yew Tree Farm is so important in this fight and has done everything to maintain the natural habitats for wild life and conservation along with the SNIS. Mitigating tree loss and hedges which would take years to repair. These proposed burial sites are mostly on a hill or in the boggy land and most importantly is the impact of water drain off from the land which may contain toxics that could enter nearby water sources. There is also a flood risk which was brought up from a previous report. It is estimated 800,000 gallons of formaldehyde are placed in the ground each year from burial sights yet we still bury our heads.

This area in our childhood was a wonderful place Hancocks Woods, the stream and the ponds from the old brick works, freedom somewhere to walk he dogs yet gradually everything is being eradicated for over development of a crematorium. My family are in the crematorium looking over Bristol and must be thinking what Next....That's for you all to decide...

Regards

Mrs Rhona Cockle

Please stop all proposed encroachment and building on yew tree farm by Bristol city council and private developers. Thank you.

application number 20/05714/FB

I am a horticulturalist specializing in food production and ecology. I have been working at Yew Tree Farm part time since returning to work after starting a family in March of this year. I have been looking after the vegetable garden which supplies the farm shop and we hope to be able to expand the operation next year.

The farm is a fantastic example of a low impact food producer working in harmony with nature and has an abundance of native tree, wild flower, insect and bird species which are apparent as soon as you step onto the pasture.

The particular site in question, complete with ancient oak, maple and tri-trunked crab, is enjoyed by a daily procession of local walkers as well as the swifts swallows and jays which hunt there.

Not only would all this be gone, but if the loss of the land renders the farm economically non-viable I would lose my job, locals would lose an excellent source of fresh produce, and the charitable groups who bring their clients there to experience rural activities would have to find somewhere else, and there are not many places like this still going in the region.

The proposal to take fertile land out of food production and instead to use it for burials, which are unnecessary, is a bizarre decision for a country already struggling to feed itself. I hope this folly will be reconsidered, and you might try building up the level of existing sites as other councils are doing, and allow cremation only within the jurisdiction. If this is not possible you should be looking for a site outside of the city limits that would not ruin an SNCI and productive land.

Thank you for your time,
Matthew Davies.

Dear All

I write in favour of this long awaited application and fully support the management and site teams that carry out this dignified work for us

As you are aware it has been some time since this type of application has been considered and you will certainly know it is much needed to to the current allocations not being suffice to move forward for future generations therefore would urge you to use careful consideration to all the diverse communities and there needs in our lovely city of Bristol

We have i feel a duty of care to ensure all are able to die with dignity and be laid to rest via burial or to whatever method there beliefs align

For those who are unaware as Muslims we do not have the choice of cremation or any other type of funeral other than burial and for this to continue we need your full support on this application

If we can be of any further assistance please feel free to contact us

Best regards

Shahid Akram

Ummah Funerals Ltd - MD
National Burial Council - SW Lead
BCC AdWG - Panel Member

I am logging my objection to the expansion of the cemetery and reducing the area of yew tree farm. Yew Tree Farm is a local business that enforces organic, local and community. My objection is now logged.

I am logging my objection to the expansion of the cemetery and reducing the area of yew tree farm. Yew Tree Farm is a local business that serves the community, it provides a haven for nature and wildlife. It is the last working farm in Bristol, it provides so much for local people and we cannot afford to lose anymore land for selfish human greed.

When Bristol is imposing clean air zones because it acknowledges we are polluting our Earth to huge detriment and then doesn't protect the land that is so bio diverse is absurdity. Probably because you can't make money from the land as it is, you're not interested in saving it or protecting it.

My objection is logged.

Rebecca Bell

11.12 Yew Tree Farm

I agree with the council plan to keep Yew Tree Farm as greenbelt land in the local plan. This site should be protected forever for nature and food production. Yew Tree Farm is important to me because it is supporting many species of birds, mammals and invertebrates, in an important area so close to the city which is important for residences mental health and well-being. It is so accessible to many people, for watching wildlife, walking and exercising, helping to save the environmental disaster we are currently in, by conserving species for the future generations.

I object to the proposal to extend the crematorium for the following reasons:

It will make Yew Tree unviable.

The proposal will mean building over an SNCI.

It will mean removing mature trees.

I urge the council to closely investigate the huge negative impact on this area and adjoining land that such a plan would have.

Kindest regards

Toby Baker

Dear All

I am writing to object to the extension of the crematorium in to Yew Tree Farm. The Farm is an SNCI with numerous wonderful species of wild life. It's a haven, not only for the wildlife, but for the people of South Bristol. This farm and this farmer are central to the community.

There have not been enough surveys done on the new species of insects and the fragmentation of the farm would make it impossible to run. Please reconsider and expand elsewhere or not at all.

Regards

I am writing to object against the expansion of Bristol crematorium! There is a SNCI in place here to protect our wildlife! Also some very beautiful and mature trees too! And it will definitely make Yew Tree Farm unviable! All of this is extremely saddening! So this is why I object and your expansion should not be able to go ahead!

Teresa Tremlett.

Hi, I am writing to oppose the expansion of the crematorium into the land at Yew Tree Farm. This would take a net positive for the environment (wildlife habitat, carbon sink, pollinators, green space in the city, water resource etc) and turn it into something that is detrimental to the environment, presumably a massive car park with no cycle parking provision like South Bristol Crematorium.

I hope this scheme is reconsidered and Yew Tree Farm is saved.

Kind regards,

Mel Osborne

Planning reference number: 22/05714/FB

Dear team,

I strongly OBJECT to the proposed expansion of the crematorium site into the fields currently used by Yew Tree Farm. This is an SNCI and is an essential part of Bristol's biodiversity. Furthermore:

Expansion of the site into the fields that Yew Tree farm currently use will threaten an essential provider for Bristol food. Over the last few years Yew Tree Farm has transformed into a local producer of sustainable and local food. It serves the local area with food and invaluable green space in one of Bristol's most deprived postcodes. Expansion into the fields used by Yew Tree farm will make the farm unviable.

Expansion of a crematorium will be an irreversible threat to wildlife: the biodiversity provided by the hedges and grassland of the proposed site has been well documented, including on BBC's Countryfile and Radio 4. Bristol has declared an ecological emergency and protection of this land is essential. This land should be protected as an SNCI. The idea of mitigation for damage defeats the purpose of special protection for these sites.

The space is hugely important for the physical and mental well-being of local people. It provides access to green spaces via footpaths for local people. Local people treasure this space and treat it beautifully.

The continued threats of development on this SNCI are seriously disturbing. Sustainable farming is the future of food production and this has been well documented. We should be treasuring and supporting farms like this instead of trying to destroy them with a war of attrition.

I am aware of the need for burial sites and I am sure that other, more suitable areas within Bristol can be explored with time and creativity. We absolutely can balance the protection of our green spaces and SNCIs with the growing demand on our services.

Many Thanks,
Jasmine Beard

To whom it may concern,

I am writing to object to the proposed planning permission to expand the South Bristol Crematorium onto land historically farmed by Yew Tree Farm in Bedminster Down.

Yew Tree Farm is farmed extremely responsibly to enable wildlife to flourish alongside agriculture and this is an incredibly difficult balance. Catherine Withers has been extremely successful and has created land which has now been deemed Site of Importance for Nature Conservation. I know this landscape supports bats, which will be effected by the proposed felling of mature trees and ancient hedgerows. Houses are refused planning if works disturb bat Colonies so i find it surprising that council works are not subject to the same restrictions. There is also the brook which could potentially be polluted by burial practices. Finally there is the impact on Yew Tree Farm and its sustainability if this land is no longer available for herd grazing.

I Would like it noted that I will not be available to speak at the meeting.

Yours Faithfully

Lisa Colledge

Hi all,

I am emailing with great disappointment today over your proposed expansion to the crematorium into Yew Tree Farm.

Yew Tree Farm is an important natural environment for residents and creatures of Bristol, and destroying this unique and diverse environment, one of few inside city bounds, would be a destruction of nature itself.

Please consider rethinking this expansion into this site of interest as the benefits it has to the city for mental and physical health of residents and general connection to the few natural spaces around us is indescribable.

Thank you for your time and thought,
Cas Witor

Good afternoon,

I am writing with concerns around the proposed expansion of South Bristol Cemetery and Crematorium. The area around the site is of specific scientific protections and for the council to allow this expansion it will cause an irreversible impact on local wildlife.

The area is part of Yew Tree Farm, the last remaining working farm in the city who's owner works tirelessly in support of nature in the area.

Recently we've seen the devastating action from the landowner with regards to the hedgerow. An act of vandalism that should never have been allowed by the council.

Please reconsider expansion of the cemetery, the area provides a huge benefit to the residents of the area, it supports the farms good work and the impact will be tremendous.

Thank you
David Campbell

Dear Sirs

I am writing to register my dismay that this application for extension to the South Bristol Cemetery will effectively mean the end of farming operations at Yew Tree Farm.

I recognise that the cemetery may need more capacity even though local undertakers have told me that burials are less popular and numerous than they once were. However, the needs of the living should be held as at least equally important. Not least of which is the future of the farmer with a long history of connection to the farm.

The farm provides wonderful opportunities for enjoyment of nature so close to the city and is producing good quality organic produce and community activity year-round. Its wildlife and natural habitat is unequalled in the city or beyond.

Your council and planning department has already been held in shame at "accidentally" allowing destruction of part of an historic hedgerow; please take great care that it is not held to be even more destructive in allowing this application and the potential for pollution of the land involved which is prone to flooding.

Yours faithfully

Jennifer Padfield

Hello there. I have been following the proposed planning re the development of Yew Tree farm.

The site is quite special and I believe the mitigating actions will do little to compensate the environment for the loss of this land which will change forever.

I also understand that the Council appears to be going against in going against previous decisions where the land has been protected.

It does not look good either when the Council appears to preferentially choose environmental reports supporting its case whilst omitting others that don't.

In short I am against the decision and am ready to support any actions, post decision if planning is passed to fight this in the courts and media by any means necessary to bring attention of the public to this small corner of England which is set to vanish forever.

Regards

Mr Johnson

Dear Sir/Madam,

I am writing to object to the proposed expansion of South Bristol Crematorium - application number 22/05714/FB, which I believe is being discussed at a Development Control Committee B council meeting on Weds 29th November.

I am not registering to speak at the meeting, I just wish to submit a written objection/statement for consideration which is detailed in the paragraph below.

I am objecting on the grounds that this area is an important space for nature providing a home for wildlife, and is actually designated a Site of Nature Conservation Interest. Any development on this area is therefore unjustified in my opinion and would be a loss both to nature and also a loss of community value for the people of Bristol, including myself. We need green spaces and wildlife havens as a top priority over an expanded graveyard.

Kind regards,
Fiona Cresswell

To whom it may concern,

As a regular customer of Yew Tree Farm and Shop, it deeply saddens me that yet more land that the owner and her previous generations have had long-established historical rights of use is now under planning considerations and would put the farm under immense strain to the point of potentially going out of business if approved. I am an individual who keeps bees and has many organic, low-till raised beds to grow many of my backyard vegetables. While I may not personally lose access to everything Catherine provides, many others tragically will. Over the years, the farm has built up a large community of patrons and friends, many of whom regularly attend the Cafe most Saturdays, making new friends and connections while enjoying the locally sourced food. For me, it's like being transported back to my childhood when food tasted good, in a different league, compared to the bland offerings of the cheap supermarkets. In addition to the local service provided, Yew Tree Farm produce is available at the tobacco market and various shows and events throughout the year, a loss that will be felt far and wide.

I draw your attention to a recent ruling of the lapsed retrospective default permission being bestowed that led to the landowners committing a criminal act by destroying a part of an ancient hedgerow within SNCI stratus, which came just months after Yew Tree Farm was served a no-notice eviction by the owners still threatening development on that site as a form of punishment for daring to speak out against it, and that I remind you of the recent promises and commitment to learn lessons in regards to this matter. If the authorities wanted to help, they could use a CPO and reinstate its use back to Yew Tree Farm to protect it from further criminal damage and threat of development.

It is also gravely concerning that the crematorium expansion plans involve the destruction of mature trees and the inevitable displacement of wildlife and diverse insect species that mount as a case of serious ecocide. I strongly object to it. Alternative locations can easily be found, but once you destroy a patch of nature, it cannot simply be put elsewhere. The surrounding land deserves protection from the continuous threats of development, and the SNCI should be respected and celebrated.

Faithfully,

Mike Brown.

Bristol tree forum posted the Council commissioned 2020 ecology survey for Yew Tree Farm on the planning portal, within 24 hours BCC responded with a statement telling Cllrs not to look at that report. The surveys that the council officer wants the councillors on the planning committee to look at instead had not one single document mentioning a protected species survey. How is that in line with the statement declared 3 years ago by BCC that we are in an ecological emergency.

Otter surveys were quoted in a statement from the planning officer but nowhere in any of the documents on the portal can this survey (or even the quote mentioned) be found. In your own application you say it's ok to develop over a Site of Nature conservation interest -which the Avon Wildlife trust also object to. The only ecologists that say it's ok are the the council ecologists paid by the council.

The protection from development that nature sites are getting in the new Local plan is actually less protection than Yew Tree Farm has currently. This is worrying.

Yew Tree Farm is currently: Greenbelt , not allocated for housing in the local plan AND SNCI status. And yet the Bristol city council is still trying to award itself permission to develop it!

So if the Councillors on the planning committee decide on Nov 29th that it's ok to build on Yew Tree Farm for the crematorium (because there is the faint promise of BNG and mitigation) that means SNCI status gives NO protection. So Brislington meadows and the Western Slopes (Hartcliffe)will ALSO lose their protection.

I have seen pressure from developers willing to work behind closed doors with the BCC planning department reverse the protective Curtlidge status at Stoke Lodge. (emails exposed under FOI from 2018). You see how that went? Hundreds of thousands wasted, many articles in Private Eye ridiculing the BCC planning department published all show BCC avoiding the Nolan principles and proper planning processes for financial benefit in the future.

Do not let the last working farm in Bristol and an SNCI become the next anti democratic and anti wildlife disaster this council has been shown willing to execute.

Fiona Evans

Dear Sirs,

Not a rhetorical question:

Given the level of concern voiced by local residents, not necessarily about the farm you are destroying for a cemetery for those wealthy enough to buy into it, but the absolute lack of empathy towards those who you are appointed to represent, what motive do you have to persist with your dictatorial policies?

So here is my question you have still not answered:

25 years is short-term.

What long-term plans do you have for the disposal of cadavers?



Statement to DCC B for 29 November 2023

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

Key Points

- This application must be determined under the current Local Plan. This prohibits a harmful impact to SNCIs (SADMP DM19), not under the new draft local plan which is weaker and has only just gone out for consultation, so we do not know what the number of unresolved objections to the new draft policy will be.
- The Applicant seeks to rely on ecological evidence which it has not been disclosed. A decision on a planning application cannot be made at the committee meeting until all of the available information is to hand and has been duly considered.¹ This has not been done and it is now too late.² Nor is it acceptable that key ecological information be withheld from the Development Control Committee, from us or from the wider community. It is especially concerning as the applicant is Bristol City Council. Both the Council and the LPA should be setting an example of openness and transparency.

As we predicted,³ a developer is using the latest proposals for the new Local Plan⁴ as an argument for your granting their application. See section E of the latest Officer's Report. What's more, the developer is this Council.

The current Local Plan (SADMP DM19)⁵ states that '*development which would have a harmful impact on the nature conservation value of a Site of Nature Conservation Interest will not be permitted.*'

The draft of the new Local Plan proposes to weaken this protection by only prohibiting '*development which would have a significantly harmful impact.*' While it is unclear exactly what a '*significantly harmful impact*' might mean, it is certainly a weaker protection than is currently imposed. The Officer effectively acknowledges this at paragraph 4.32 of their report.

They also suggest that this is '*a material consideration in determination of the application, although the weight that can be given to the policies will depend on a number of factors, including compliance with the NPPF [* see the extract below] and level of objections to the policies.*'

While these may be a consideration in the determination of an application, this is not enough to justify overriding the current absolute protection given by DM19, which cannot be 'weighed' in the planning decision as is suggested.

Other factors also need to be considered. For example, Principle 1 of the BNG 4.0 Metric states that: '*The use of this metric does not override the ecological mitigation hierarchy and other requirements.*'

¹ <https://www.bristol.gov.uk/files/documents/3364-part-5-d-code-of-conduct-for-members-and-officers-planning-matters/file-9.1>

² S100B Local Government Act 1972 - <https://www.legislation.gov.uk/ukpga/1972/70/section/100B>

³ <https://bristoltreeforum.org/wp-content/uploads/2023/10/Speech-to-Full-Council-31-October-2023.pdf>

⁴ <https://www.bristol.gov.uk/files/documents/6894-bristol-local-plan-main-document-publication-version-nov-2023/file> - Policy BG2: Nature conservation and recovery (p. 126).

⁵ <https://www.bristol.gov.uk/files/documents/2235-site-allocations-bd5605/file> -p. 41.



Statement to DCC B for 29 November 2023

The Chartered Institute of Ecology and Environmental Management (CIEEM), the leading professional membership body representing and supporting ecologists and environmental managers in the UK, Ireland and abroad, sets out a number of principles in its *Biodiversity Net Gain - Good practice principles for development* guidance.⁶ Principle 1 requires that the Mitigation Hierarchy be applied. This requires that ecologists:

Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.

This is the benchmark you should apply - first avoid harm and only then, if harm is unavoidable, mitigate. If this cannot be done, then compensate. In this case, harm cannot be avoided. Because a 'harmful impact' cannot be avoided, DM19 prohibits development. That is the end of it.

We urge you to apply current planning policy as it was intended to be applied and reject this application.

* Here are the relevant sections of the NPPF⁷ - paragraphs 47 to 48:

Determining applications

47. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.
48. Local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)²⁴.

⁶ <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NP_PF_Sept_23.pdf

Please do not sacrifice Yew Tree Farm, a Site of Nature Conservation Interest and a valuable green space in Bristol's increasing expansion, especially for more space for the crematorium, which could be sited elsewhere.

The farm would become unviable and eventually the green belt land taken by developers. You have a duty as employees and representatives of the people of Bristol to safeguard our city and its wildlife and green spaces.

Please act in the best long term interests of our city and countryside and exercise your power responsibly.

Many thanks

Paul Hobbs



DM19 prohibits development on an SNCI that has any harmful impact on nature

As there seemed to be some confusion as to the current policy protecting SNCIs, it is worth repeating.

DM19 states that for those areas NOT within an SNCI:

“Where loss of nature conservation value would arise development will be expected to provide mitigation on-site and where this is not possible provide mitigation off-site.”

In other words, for non-SNCI areas, any loss or damage to nature must be mitigated such that there is no net harm.

However, for development on an SNCI policy goes further than simply preventing net-harm:

“Development which would have a harmful impact on the nature conservation value of a Site of Nature Conservation Interest will not be permitted.”

This is unequivocal and without condition or caveats. The planning office themselves have stated in the report to this committee that their interpretation of DM19 is:

“Current policy suggests a refusal if there is any harm to the SNCI.”

The council, either in the guise of developer or planning office, may not like this, but as defined in the 1990 Town and Country Planning Act, and the 2004 compulsory Purchase Act, it is the responsibility of members “to make decisions in accordance with the Development Plan”. As such, the members have little choice other than to refuse this application.

Professor John Tarlton (Bristol Tree Forum)

To whom it may concern,

I'm writing to express my strong opposition to the expansion of a crematorium into Yew Tree Farm as proposed by the council.

Yew Tree Farm is an snci and of great importance to the wildlife in Bristol. It is home to many rare species that will be harmed. The proposed expansion would destroy a large number of extremely old trees and a swathe of habitat that cannot easily be replaced. In particular this will harm the rare greater horseshoe bats in the area and the beautiful wild orchids that are so sensitive and increasingly threatened in the modern world.

It is a location of importance to the local people who have strong memories and associations with it and who use it regularly for exercise and to experience nature. It's existence is a boon for Bristol.

Expanding the crematorium into this snci goes against the council's own policies. The stated policy is that every application must have a 10% biodiversity net gain. This expansion could never meet that requirement.

To accept this application and allow the expansion would be to undermine the publics trust in the councils ability to act on its own policies. It would erode trust that the council acts in good faith and it would be one more injury in the death by a thousand cuts Bristol's fragile environment is undergoing.

Yours,

Ayden Walters

I write in relation to Yew Tree Farm. Here are my comments:

There should be no expansion on SNCI. Once our plants and creatures no longer have a habitat to live in, they will be lost to us forever.

Yew Tree Farm, the last working farm in Bristol, needs the land they currently have for grazing their animals. Any reduction in the size of the land available would make the farm unviable. This would be a terrible loss to Bristol - their chemical free meat and vegetable products are incredible.

I strongly urge you to consider these points when making your decisions.
Thank you and regards, Helen Russell

Good morning,

I trust this email finds you well. I am writing to you as a concerned resident living near Yew Tree Farm, Bristol's last working farm, regarding the proposed developments that pose a serious threat to our local wildlife habitat.

Despite Bristol City Council's commendable commitment to the ecological emergency plan, Yew Tree Farm is currently at risk due to the proposed expansion of Bristol South Crematorium.

Yew Tree Farm has been a vital part of our community for generations, managed with wildlife-friendly practices that support a diverse range of species. Beyond being a farm, it serves as a crucial link between our city and the countryside, aligning with national strategies for restoring nature.

I urge the council to reconsider these developments and uphold its commitment to protecting designated Sites of Nature Conservation Interest (SNCIs). Working collaboratively with Catherine to preserve the farm would ensure the continuation of her wildlife-friendly practices and safeguard our local environment.

Thank you for your time and dedication to the well-being of our city.

Sincerely,

Joe Beard

Statement to Development Control B Committee - Wednesday, 29th November, 2023

I am very concerned about the officer report that is presented today.

It was clear from the previous meeting (6 September 2023) at which this planning application was discussed:

- That alternative sites (other than existing cemeteries) had not been considered
- It was RESOLVED (7 for, 2 against) – that the application be deferred pending a further report to be resubmitted to a future meeting. This should include possible reasons for refusal based on the issues suggested by Councillors at the meeting.

The current officer's report does not include:

- Clear evidence that a range of alternative sites have been considered that would not involve harm to this important SNCI and the viability of Yew Tree farm
- Reasons for refusal based on the issues suggested by councillors at the meeting

Once again, it appears that there has been interference with the planning process and the officer has written a report with the sole intention of supporting the previous recommendation rather than responding to the issues raised by the committee on 6 September 2023. This was presumably prompted by the Mayor's office, since the Mayor's blog blatantly argued that the application should be approved [Creating more space for the memory of Bristolians' loved ones - The Bristol Mayor](#).

I hope members of the committee have the courage and strength to defer this decision again, and to ask that the points above are properly considered in a further officer's report.

Suzanne Audrey

Dear Bristol Council

I grew up on this farm with one of my oldest friends.

I visit and walk the farm regularly and would hate to see all the hard work of maintaining this beautiful haven in the middle of Bristol destroyed.

My Children as well as my nieces and nephews have all had access to the farm on a regular basis. It really does need to stay for the next generations as a legacy that in this crazy world where everything is cut down and dying, Bristol Council do care and remain proactive in all their conservation decisions.

I await your decision on Wednesday.

Kind regards

Katie Milne

I strongly **object** to the proposed expansion of the crematorium into land used by Yew Tree farm for the following reasons:

1. The land is an SNCI and drainage and works will cause irrevocable damage to the precious wildlife and wider biodiversity in Bristol.
2. The area contains ancient trees which will be destroyed. This is in direct opposition to Bristol's statement of being in an ecological crisis. These trees are also essential to drainage.
3. Yew Tree farm is a business essential to the local community and is an employer. Expansion of the crematorium into this grazing land will make the farm unviable as it cuts into the grazing available.

Yours Sincerely,
Joshua Roberts

To whom it may concern,

I am writing to you with deep concern regarding the proposed expansion of the crematorium that would encroach upon the invaluable Yew Tree Farm. As a resident deeply invested in preserving Bristol's natural heritage and committed to the welfare of our environment, I implore you to reconsider this plan and safeguard the last working farm in the UK.

Yew Tree Farm stands as more than just a symbol of agricultural heritage; it is a thriving ecosystem, a haven for biodiversity, and a precious green space within our city. The expansion plans threaten not only the livelihood of this historic farm but also jeopardise the diverse wildlife habitats and ecosystems that call it home.

Expanding the crematorium over these wild areas across the farm would undoubtedly lead to irreversible damage to the wildlife and biodiversity that flourishes there. The repercussions of such actions would be felt for generations to come, impacting the balance of our local environment and depriving our community of a vital natural refuge.

Preserving Yew Tree Farm is not merely a matter of conserving a piece of land; it is about safeguarding Bristol's natural heritage, protecting crucial green spaces, and ensuring a sustainable future for our city. These green spaces are essential for the mental and physical well-being of our citizens and play an integral role in maintaining the ecological equilibrium.

I urge the council to explore alternative options that prioritise conservation and sustainability. Collaborative efforts can find solutions that honour both the need for respectful crematorium expansion and the imperative to protect Yew Tree Farm as an irreplaceable asset to Bristol's environmental legacy.

As constituents deeply concerned about our environment, we implore you to reconsider this decision and work towards a solution that upholds the values of conservation, sustainability, and the preservation of Bristol's natural heritage.

Thank you for your attention to this urgent matter.

Yours sincerely,

Matt Jarvis



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

The proposed Cemetery expansion into Yew Tree Farm is only a short term fix.

The projected number of burials for the expanded cemetery, and its predicted active lifetime until 2039, assumes that the majority will be double depth burials.

However, Cemetery Development Services analysis has made it clear that, for site 1 and site 3, because of the shallow soil depth, only single burials will be possible. This reduces the number of burials by around 2500, and the projected active lifetime only until 2033. Therefore, in less than a decade we will be back where we are, looking for an alternative site by which time current alternatives may no longer be available.

As such, this is not the long-term solution to Bristol's need for additional burial capacity, and therefore the benefits do not outweigh the clear detrimental impacts of this proposal.

Rob Griffin

Bristol Tree Forum

Hi,

Below is my statement for the DCB meeting on Nov 29th regarding the crematorium expansion application. I will attend and would like to speak

BNG does not include protected species

Protected species have separate protection under the NPPF and in Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations (2017). The impact on protected species (like bats and badgers for example) has to be fully assessed before approval. Surveys have to be done over several days at certain times of year to be valid. In addition to this all that information has to be included in the report and that report needs to be made public as part of the application documents. None of this has happened. Not one CIEEM standard protected species survey was published on the portal. You can see for yourself on the planning portal if you don't believe me. This application does not have the required information to make a decision on the impact on protected species so it must be refused. No conditions for surveys are allowed.

Sources: [Protected species and development: advice for local planning authorities - GOV.UK](#)

The Species Surveys have expired and are inadequate.

The last published species surveys were done in 2020. All surveys expire after 3 years and some expire earlier. Species surveys can not be conditioned.

Sources: <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

Ecological Mitigation is Unreliable

An award winning study published in the British Ecological Society in 2021 found that the majority of ecological mitigation measures were not reliable or based on evidence. I highly recommend reading this study in full when you have time but here is a summary for now:

'We found that, of the 446 species mitigation measures we identified in total (65 different mitigation measures relating to eight taxa), real-world evidence on the effectiveness of those measures had been gathered on less than half of them. Additionally, the Conservation Evidence synopses suggest that only 15 of 65 measures are actually supported by evidence that suggests they work in practice. This paints a worrying picture of the ability of current ecological mitigation practice to compensate for the impacts of development and thus halt species declines in the context of rapid development.'

The truth is while it looks good on paper most mitigation doesn't work in practice. Offsetting was meant to be a last resort not common practice. If we keep moving nature when it's inconvenient for development we won't have any left.

Sources: [Evidence shortfalls in the recommendations and guidance underpinning ecological mitigation for infrastructure developments - Hunter - 2021 - Ecological Solutions and Evidence - Wiley Online Library](#)

<https://www.imperial.ac.uk/news/235860/cep-student-wins-georgina-mace-prize/>

Biodiversity Net Gain is very new

Biodiversity net gain is so new it's not even mandatory yet. We just don't have the years of evidence based data to rely on it yet. Its benefit for replacing existing wildlife has not been proven. BNG is meant for increasing biodiversity on sites with little to no nature present, it's not supposed to be used as a way to justify harm to established ecosystems. We can't let an irreplaceable site like Yew Tree Farm be our BNG guinea pig.

Avon Wildlife Trust objects

Avon Wildlife Trust objects to this application and they don't object to things lightly. In the past 3 years they have only objected to 3 other applications/allocations: Western Slopes, Brislington Meadows and the Redrow section of Yew Tree Farm. This should be all the evidence you need that this application needs to be refused.

The Lawful development certificate application was wrong

I feel we are glossing over the fact that these same officers who are swearing that this is the only option for burial space and that no harm will come to Yew Tree Farm or the SNCI also swore they didn't need planning permission at all! They told us all this was a done deal and they had a Lawful right to develop. They were wrong about this and had to withdraw their application. If it wasn't for Bristol Tree Forum challenging officers the lawful development certificate would have been approved by the officers themselves. There is therefore a precedent of these officers being wrong about this site. They were proven to be wrong about not needing planning permission and now they are wrong about the harm caused to the SNCI status.

The most recent officer report is riddled with errors and biased language. One example of this is that the number of objections posted in the conclusion is wrong. The officers are claiming there are only 14 objections vs 32 support comments and the real number is over 65 objections vs 32 support comments.

I don't say this to punish officers, I only ask that you take what they have to say with a grain of salt and listen to independent experts (independent meaning not hired by or working for the council). This is especially important when it comes to ecology issues.

This will put all SNCIs at risk

Interpretation of DM19 to allow 'harm' if there is BNG and/or mitigation will open up every SNCI to development especially those being taken out of our local plan like Redrow site and Western Slopes/Novers Hill.

If the planning committee decide that it's ok to build on Yew Tree Farm for the crematorium expansion because there is the faint promise of Biodiversity Net Gain and mitigation that means SNCI status gives zero protection for the privately owned sites we are trying to protect in the next local plan (Which btw I support). It opens Novers Hill and the Redrow section of Yew Tree Farm right up to developers especially since the local plan still needs to be approved by a planning inspector. Developers including Lovell and Homes England have already left comments on the draft local plan saying they intend to fight the council to include development on our beloved nature sites with SNCI status. We can't let this happen.

Sources: [pdfsummary of responses to the consultation \(pdf, 1.22 MB\)](#)

The mitigation proposals for Soil preservation are unrealistic, unviable and unenforceable

The Soil preservation requirements needed to maintain SNCI status are unrealistic and expensive to enforce.

'3.1 When graves are dug, handle soils with care: remove and stack turf; remove and store topsoil and subsoil separately; return soils and turfs appropriately; and avoid excessive compaction.'

Two separate experts have been consulted to give their opinion on the practicality of this mitigation proposal and both have said the same thing. While technically it's possible in theory, on this site its never going to happen. Here is a direct quote from a real gravedigger:

'When there are headstones or kerb sets, the soil dug out can't go back because of the footings. Plus, when you put human remains like ashes or bodies in the ground, it changes the soil. He also mentioned that expecting grave diggers to put the soil back exactly as it was is unlikely. Even if they promise to do it, how can you check? And by the time you figure it out, it's already too late.'

Sources: Daniel Badger Priest- construction and erosion control expert with 40+ years of managing building sites and conducting housing research.
A professional Grave digger.

Banning memorials is an equalities issue

In the previous committee meeting for this application, a big deal was made about burial space being an equalities issue. There were also comments made about providing a safe space for the bereaved community.

However one of the conditions in the ecological mitigation proposal document is:

"3.4 Restrict memorialisation to a small stone and a container for flowers. Explain rationale to plot holders and remove any surplus material."

How will this be explained to grieving visitors who are not plot holders but visiting lost loved ones? Will grieving families have to tell everyone they know that you can't leave anything if you are visiting their grave?

If a family loses a child and left a plastic toy as a memorial would the crematorium staff really take it away? This leads to a situation where the staff have to either upset grieving families or the SNCI will be damaged. That's a horrible position to be in and it's most likely that the SNCI will be the loser in this scenario.

Banning Plastic memorials is cruel to grieving families and difficult to enforce. It throws the equalities argument out the window.

This goes against our Nature commitments

Yew tree farm is 'Low hanging fruit' for our commitment to preserve 30% of our land for nature. We should be looking to help get it to SSSI status, not turning it into a graveyard and mitigating damages. An independent ecologist that surveyed part of Yew Tree Farm mentioned that the site is only a few species away from qualifying as an SSSI and if not disturbed could reach thst in a year or 2. This won't ever happen if the crematorium expansion plan goes ahead.

We can Compromise

There is a compromise where everyone wins. This application could be refused and the council can submit a new one for just the non yew tree farm site. That way we have burial provision for the next 5-10 years and we don't have to damage the farm. Then efforts can be made to fully explore alternative sites like Elsbert Dr or Ashton Ct. It makes far more sense to find a site that doesn't require a £1.7million drainage pond.

If you refuse this now a new application can be submitted if that is in fact the wrong decision. If you approve it then that's permanent. You can't undo the destruction of the SNCI once it happens. You can't undig the drainage pond and bring the wildlife and trees back to life. If officers are wrong and this mitigation doesn't work you can't take that back

Green spaces motion

In sept 2021 full council passed a motion unanimously that protects Yew Tree Farm specifically. Ignoring this motion as this application does, is anti-democratic. The exact wording of the motion is:

'Full Council resolves:

Council calls for 1. To call for a halt to the proposed redevelopment of or incursion into any remaining productive wildlife rich agricultural land.'

Note it says halt any incursion- objectively this application is an incursion.

Let's not forget that access to nature is an equalities issue and South Bristol has some of the most deprived areas of the city. Those of us supporting the farm are not a loud minority group as some politicians like to claim, we are South Bristol. We are the majority. Yew Tree Farm SNCI is universally supported not only by local residents but by wildlife experts, environmentalists, farmers and sustainable food organisations. It would be an assault on our community and planet to lose this site for burials. I know this statement is long but it's very important. Thank you to all those that got this far. I hope you will make the right decision and refuse this application.

Thank you,
Danica

Good morning, to whom ever this may concern.

56

I understand there are expansion plans to build across Bristol's last working farm - Yew Tree Farm in order to expand the crematorium.

As you may know, cremating releases, extremely harmful gases and is not good for the environment in itself. Why not focus on pushing through human composting - the greenest option for our damaged and hurt planet <https://terramation.uk/>.

Expanding the crematorium will only cause further destruction to our important SNCI greenbelt, kill mature trees, nature and hedgerows!

How can Bristol impose a clean air zone and then destroy any carbon sequestering land for a crematorium that harms the environment further.

Please don't do this!

Objection from 6 Bristol people here:

Charlotte Roest-Ellis
Chris Williams
Yvonne Ellis
Al Ritchie
Sascha Holland
Sebastian Roest-Ellis

I object to the planning application for the expansion of South Bristol Crematorium And Cemetery
Bridgwater Road Bristol BS13 7AS .

We must save Yew Tree Farm, Bristol`s last working farm, at all costs.
The land has been a SSSI for decades and is a home to numerous species and a community asset
that must be saved. We must look after our green spaces, particularly one as important as this one.

There is no good reason to give up a nature reserve for a graveyard.
Bristol is meant to be a green capital and there has been no mention of protected species in the
documents. Why?

This application is only for a short term solution to a long known problem and there are much better
options available, which would be future proof.

£1.7 million for a drainage system is madness when it could be spent elsewhere and our council is
short of money.

I ask that you reject this planning application.

Alison Hughes

Please find my statement below.

My name is Catherine Withers and I live and farm at Yew Tree Farm.

I am the farmer and the only member of my family who lives in the City and I hope to farm here for the rest of my life and pass this onto my children to farm in the same wildlife friendly way.

I am so disappointed that this application is being brought forward again without proper scrutiny.

If you pass the expansion onto these pastures that should be protected from development, it will be almost impossible for me to hold back the tide of opportunistic speculators on the farm.

I have already lost 13 acres this year and now face the threat of losing many more from the very council that has sworn to protect the farm.

I am beyond disappointed that there is not an up to date species list, nor has the ecological report that is supposed to supersede the 2020 report been published, if it indeed exists. These practices are those of fly by night developers and should not be those of the council themselves.

The additional documents submitted by Oliver Roberts since September's meeting refer to email exchanges which were written before I realised the protections SNCI's should afford and before we discovered the Council did not have a lawful certificate of use. Please discard them.

To condition a LEMP is not good practice; we have seen many recent examples of conditions that have not been implemented in Bristol. I greatly fear this will be yet another scheme. For example I have been requesting a kissing gate from the entrance into the fields from South Liberty lane since 2019 to prevent motorbikes entering the fields and to stop the cows getting stuck under the bridge as has happened twice this Summer- the second time a cow had tried to jump the gate and got stuck and fire service had to attend. I still have no kissing gate.

The poison pond (attenuation pond) is huge and worries me so much, Oli has tried to allay my fears of anti-social behaviour and vandalism to the wooden fence by saying I will have a priority contact for repairs from a council department. How many of the committee believe this would happen?

I have been warned about the harmful chemicals that will be drained into the pond from burials – embalming fluid such as formaldehyde, plastics and toxic glues used in MDF. The beef produced on the farm is sold as grass fed. The fence will last probably about a week before being vandalised, I do not think many would want to eat beef that has been drinking the water from this pond.

Indeed Rupert and Ollie have suggested that I can access the inner area of the pond for Summer grazing when the water levels are lower. I would ask, do you think this land would be free of contaminants, if you are a meat eater would you be happy to eat our beef?

I have not been shown any detailed plans to see how the public footpaths and cattle movements will work, currently we have only one gateway which can be a pinch point between the public and walkers, the pond will cause more pinch points, this could prove dangerous for both livestock and public.

When I walk over the fields and see the graves in the crematorium there are lots of plastic flowers and the graves are memorialised with solar lights and windmills. I understand that the new burial area will not be permitted to display and memorialise their departed loved ones in the same way? Does this comply with Bristol's equality policy?

As the land is considered a prominent hillside and protected as such has a conservation officer submitted a report or been asked?

Can Bristol really afford to lose the last flock of Bullfinches, Siskins, redwings? There is a strong possibility of dormice on site which should be thoroughly investigated. This land is an SNCI for good reason, this proposal is fragmenting a unique landscape.

It is obvious that Yew Tree farm pasture is not ideal for burials, the land is very steep and the huge attenuation pond that is required appears unworkable with the conservation grazing that you require to maintain the SNCI status of the land.

Catherine Withers

I am objecting to the expansion of the Crematorium at Yew Tree Farm as BCC cannot guarantee their assurance of removing the soil and replacing it back to its protected/current state.

Having been a Gravedigger and Crematorium Technician in a previous employment, I am qualified enough to know that where there are headstones, or kerb sets, the soil that's dug out for that can't be replaced as the footings will be there instead.

Also the human remains whether that's ashes or bodies is going to change the make-up of the soil.

Its very unlikely the grave diggers will separate the levels of soil and put it back the same way it was. They may say they are doing this but they won't, and how do you prove they are following this practice? By then it's too late anyway.

This is a ridiculous promise that cannot be kept and therefore should not be expanding the site into protected, conserved soil and land.

B Penrose

statement in rejection of the proposal of the development plan and expansion of the crematorium based on the grounds mentioned here:

The site is an SSCI (site of nature conservation interest) and, therefore, should not be touched according to policy DM19

- Biodiversity net gain (BNG) doesn't cover protected species.
- Bristol city council passed a motion in sept 2021 that said our greenbelt and nature rich green sites should be protected. Passing this would violate the green spaces motion
- There are veteran trees that would be damaged to the point of death
- This is a beloved site of recreation for residents
- This would put Yew Tree Farm out of business
- This is against our climate and ecological emergency.
- The site is in the greenbelt
- No other burial land options have been explored
- There's a compromise where they can just use the plot that isn't going to effect the farm
- This application harms bats because it takes away their foraging space
- The £1.7 mil drainage pond is a waste of money. Find a site that doesn't need a drainage pond

The expansion plan will cause irreversible damage to so many trees, wildlife habitats, and Yew Tree Farm.

If the planning committee approves this plan, they indirectly approve any planning permissions on the SSCI sites. This is an important decision and needs to be looked at by considering the impact it will have on other green areas, such as the western slopes,

Also, BCC can't introduce the importance of planting trees in town and then approve a plan that will kill valuable trees. Saving trees means saving the future for our kids. The next generation will not forgive us if we don't take our responsibilities seriously when it comes to saving nature.

The planning committee, please reject the planning application on this site and save so many valuable lives.

Best wishes,
Nasim Dumont

Application ref 22/05714/FB

I wanted to submit a written statement expressing concerns about the proposed expansion of Bristol Crematorium. I am deeply concerned about the material impact of reducing yet another of Bristol's green spaces (Yew Tree Farm), with the consequent risks to environment such as flood damage, that this poses. This site is a protected area and the last working farm in Bristol; also home to a great deal of wildlife and animal life that will be eradicated if this development takes place. The proposed development will therefore have a significant negative impact on nature and the environment. It will also affect the character of the area by removing a popular and well loved green space.

Many thanks for your time and consideration.

Dr Julia Round

To whom it may concern

I am writing to object to the expansion of the crematorium by taking away land that has been used by Yew Tree Farm, Bristol's last working farm. Yew Tree Farm is dedicated to traditional farming practices, with vital importance to the sustainability of our natural environment and biodiversity, both of which contribute to reducing climate change.

Implicitly, I am strongly against the expansion of the crematorium on the grounds that SSSI protections will not be honoured, with an ensuing adverse impact upon the natural environment and preventing a working farm from promoting a healthy environment. We are witnessing the dire effects of climate change around the world. I cannot believe that Bristol City Council would even consider the expropriation of farmland which is being farmed traditionally. I implore you to make the right choice - that is, to think of the future of our children and young people who will have to live with the consequences of your decision.

Karen John, PhD,
Psychologist and Psychotherapist,
Chair, Mentoring Plus - Inspiring Young Lives

To whom it may concern

I'm writing to object to the FB South Bristol cemetery expansion, I understand this will destroy a piece of land with which I am acquainted. it is a piece of land which has been relatively undisturbed apart from a few horses and in the past, cattle grazing and long been free of farm chemicals. As a keen supporter of wildlife and the diminishing natural environment (I am an X BBC natural history film maker) I am concerned that there appears to be no up to date species list for this land or evidence of an ecological assessment. This should concern us all with Given our poor record of rapidly reducing green spaces and declining fauna and flora species in Britain, examples like this should concern us all. Surely a cemetery could be found a less nature rich "resting place."

Kind regards

Yvonne Ellis

Yew Tree Farm

Proposed Crematorium Expansion

This is an outrage and should not be considered.

Yew tree farm is an amazing place for wildlife and should be conserved. We should be considering supporting life not expanding with death.

There must be alternatives for the crematorium.

Yew tree farm is important to the local area. I myself and my family use it regular.

I object to the expansion

Lizzie Stephens

Please find below my statement for Development Control Committee B, 29 November

regards

Mike Oldreive

Agenda item 9- Expansion oof South Bristol Crematorium - Encroachment onto Yew Tree Farm

There have been errors in the planning process, notably in the initial view that permission was not needed for this development, and that the number of objections have been under-reported to Committee by officers. Is there clear evidence that all other possible alternatives for burial sites across the city have been considered in full? Can the public trust the current report and the insistence that this development will not harm, and will actually benefit, nature?

Biodiversity Net Gain (BNG) doesn't cover protected species. Animals like bats and badgers have their own rules to protect them. To know if developments will affect them, checks must be carried out over a few days at specific times of the year. Yew Tree Farm surveys are out of date and incomplete as they were not re-performed very 3 years. The BNG concept is effectively untested. It sounds good on paper, but research (reality checks) showed that most of the plans aren't working effectively.

Yew Tree Farm, and its role as a habitat for wildlife, is too special to risk as an experiment to inform more developments in similar sites. Is Yew Tree Farm the "thin end of the wedge" to allow encroachment on similar green spaces in the City? The Avon Wildlife Trust is clear that it opposes this plan. This is an indication that it is a bad idea for nature and wildlife.

Last year, our council passed a motion to protect Yew Tree Farm. Why is the Council now apparently breaking its promises to the public?

END

To whom it may concern,

I am getting in contact as I would like to strongly object to the proposed expansion of the crematorium into the historic Yew Tree Farm in Bristol.

Subject: 20/05714/FB expansion of a crematorium into yew tree farm.

The primary reasons that I am objecting to the crematorium expansion are:

- The cemetery is highly disruptive and will make the family run farm known and loved across the south-west completely unviable
- The cemetery will destroy and kill irreplaceable mature trees
- The cemetery will disrupt an important habitat for local wildlife
- The cemetery will be built on an SCNI thus and cause damage to an SCNI
 - Cutting down mature trees and meadows has major negative environmental impacts. Mature trees play a crucial role in carbon sequestration, so their removal contributes to increased levels of carbon dioxide in the atmosphere, which in turn contributes to climate change
 - Meadows are important habitats for numerous species, and their destruction can lead to loss of biodiversity.
 - Additionally, the trees and meadows in the ecosystem at Yew Tree Farm helps regulate water flow and prevents soil erosion. These are important to the local ecosystem and urban area. Disruption has the potential to cause nutrient loss of fertile topsoil, water runoff potentially leading to surface flooding in flood risk locations and increased water pollution and sedimentation.

The proposed cemetery is not a responsible use of land and specifically not of SCNI land. Not only will it have devastating effects on a historic, family run working farm, but it will also have adverse effects on the local nature and contribute to a detrimental environmental impact.

These can be mitigated by objecting to the proposed cemetery expansion. I urge you to reconsider.

Thank you,

Dr. Sascha Roest-Ellis

(DPhil Oxon, MSci, Fellow of the Geological Society of London)

Application No. 22/05714/FB: South Bristol Crematorium and Cemetery - Bridgwater Road Bristol BS13 7AS

Statement to Planning Committee – 29th November 2023

Strategy? To address objections head on or to reiterate the lawfulness / compliance of the application?

Bristol City Council recognise the points of objection raised against this the proposed development. In bringing forward this development the council has explored alternative options for the provision of essential burial and cremation services. Mitigation related to development within the SNCI has been thoroughly developed to ensure a net improvement in biodiversity. The council can assure the committee that the application meets the necessary conditions to enable consent to be granted.

Since the last Development Control Committee Meeting on the 6th of September the Council has submitted two supplementary documents.

- *Supplementary Planning Information – 29th September 2023*
- *Cemetery Expansion – Strategic Statement – 10th November 2023*

These documents provide comprehensive answers to the questions received from the public during the Committee Meeting.

To highlight a few of the issues addressed:

- Concerning protection of the SNCI. The council have undertaken extensive ecological surveys to inform the development of effective mitigation proposals. These proposals will ensure an overall biodiversity net gain benefit for the SNCI. The proposals will also protect the council owned land from future degradation of grassland due to bramble and scrub encroachment.
- Regarding concerns raised about the extent of consultation with Yew Tree Farm. Extensive engagement took place via Catherine Withers prior to the application, a record of which was provided in the supplementary information submitted on 29th September 2023. The Council has consequently engaged with the registered owners of Yew Tree Farm, who have confirmed their support for both the cemetery expansion and entering a farm tenancy agreement for grazing the residual land within the SNCI.
- Regarding availability of grazing, studies have highlighted that bramble encroachment has had a significant impact on the grazing capacity in this area. The council have committed to measures to minimise the grazing area lost and proposed grassland restoration will significantly mitigate this loss. Phase 1 net loss being as little as a 3%.
- Addressing the necessity of the proposal, the cemetery expansion is essential to maintain choice and equality in the availability of burial and cremation services in Bristol. This must reflect personal values, choices and religious beliefs.

- The proposal presents good value for the city, it utilises existing infrastructure and operational capacity in an accessible location. This is essential to ensure bereavement services can be provided in an affordable cost.

SOUTH BRISTOL CEMETERY, PROPOSED EXTENSION - 22/05714/FB

The following statement has been prepared by Rupert Higgins of Wessex Ecological Consultancy summarising the ecological assessments undertaken in support of the application.

1 BASELINE

A comprehensive series of surveys was carried out in order to identify and minimise potential impacts associated with the proposals. These focused on impacts associated with the key features of the SNCI, which are species-rich (unimproved) grassland and ancient species-rich hedgerows, with associated trees.

As a result, the proposed extension has been limited to an area of species-poor semi-improved grassland, which is of significantly lower nature conservation value than the species-rich grasslands elsewhere on site; the latter are present on the most steeply sloping parts of the SNCI, which will not be affected. The ecological value of the proposed extension area has been further reduced by bramble encroachment across parts of the area over the last two years. The species-rich hedges and associated trees will not be affected.

2 PROPOSED EXTENSION

Grassland across the proposed extension will not be lost in its entirety, although its nature will change and there will be a comparatively minor reduction in area. Survey of the existing cemetery and of other cemeteries in and around Bristol shows that considerable ecological interest can be retained within cemeteries and measures to maximise the ecological interest of the extension will be incorporated.

Incorporation of the proposed extension areas will be phased, so that area 3 (the area within the SNCI) will remain available for cattle grazing for up to 15 years.

Measures to ensure that ecological interest is retained will include: method statements for the handling of soils and turf during grave digging; restrictions on monument size to ensure that grassland is retained over and between burials; and implementation of a long-term grassland management plan. This will include a mowing regime that maintains a moderately short sward, which will have a formal appearance but will allow short-growing herbs to flower. Wild flower lawn management of this type is an established practice at several sites. The sward will change in nature, but a shorter turf of the type that will be created can be of greater value for some groups, such as waxcap fungi and mining bees, than a longer turf.

Strips of longer turf will be maintained around boundary edges to provide habitat for insects and small mammals, and therefore predators such as tawny owl and weasel.

Enhancement measures carried out will include the planting within the existing cemetery and expansion area of over 90 new trees and 1.5 kilometres of new hedgerow. This will provide a significant level of ecological benefit; species that are known to use these habitats within cemeteries include threatened birds such as green woodpecker and mistle thrush.

3 WETLAND CREATION AND ENHANCEMENT

The proposals include creation of a new wetland habitat on an area that currently has species-poor grassland. The new wetland will be designed to maximise its ecological value as an example of a rapidly disappearing habitat type.

The outfall to the brook will be routed through an area currently damaged by cattle trampling and will incorporate measures to enhance the ecological value of the brook and its banks, whilst continuing to allow cattle access for drinking. Instillation of the outfall, and other works, will be carried out under ecological supervision.

4 GRASSLAND ENHANCEMENT

The most significant enhancement measure will be to restore species-rich grassland on the SNCI. This will be achieved by clearing areas of bramble and other scrub that have encroached across the grassland in recent years, resulting in a significant decline in ecological value. The core historic hedges will not be affected. These measures, and those relating to the cemetery expansion, will be fully set out in a 30 year management plan for the SNCI, implementation of which will benefit the whole site.

An area of species-rich grassland in Site 1, outside the SNCI, will be retained and managed using an annual hay-cut, which will be a more sympathetic management regime than the recent regime of intensive horse grazing.

5 PUBLIC ENJOYMENT

Although the SNCI is currently visited by significant numbers of people and the existing cemetery has significant ecological value, there is no interpretative or other material to promote public enjoyment of wildlife. In order to remedy this, ecological interpretation boards will be provided and a new access route to the SNCI will be created.

6 BIODIVERSITY NET GAIN

A Biodiversity Net Gain metric has been completed, showing that the measures outlined above will result in net gains of 2.93% in area-based units, 107% in hedgerow units and 0.19% in river habitats, meaning that the proposals are policy compliant.

Some of the enhancement measures will be implemented in areas outside the planning application red line and are therefore categorised in the metric as being off-site. However, the measures proposed are all within the area of the SNCI owned by BCC and are appropriate to ensure that there will be no overall harmful impact to the SNCI arising from the development.

Dear Planning Committee,

Here is Avon Wildlife Trust's Public Forum Statement for Development Control Committee B Meeting on Wednesday 29 November, regarding the proposed extension of South Bristol Cemetery (22/05714/FB).

Written Public Forum Statement

Avon Wildlife Trust objects to the proposal to extend South Bristol Cemetery into land currently managed as part of Yew Tree Farm.

While we recognise the need for cemetery provision, Avon Wildlife Trust urges the Council to look for an alternative site.

Bristol City Council has recognised that we are in the midst of an ecological emergency and need to take urgent action to protect and restore habitats for wildlife. In this context it is imperative that we protect important wildlife habitats that remain.

Yew Tree Farm is an immensely rich wildlife habitat supporting a wide range of species including plants, bats and birds that are increasingly scarce in surrounding areas. This has been recognised through the designation of parts of the farm as an SNCI by Bristol City Council, which brings with it a presumption of protection from development. It is vitally important that Sites of Nature Conservation Importance are protected through the planning system, and even more so in cases such as Yew tree Farm where the current wildlife value is so high.

Recent ecological surveys at the site have identified the presence of dormice, speckled, dark and Rosel's dark crickets and a wide range of bats, including Serotine, Brandt's, Daubenton's, Natterer's, Leisler, Noctule, Nathusius, common and soprano pipistrelle, lesser and greater horseshoe and brown long-eared.

In addition to its importance as an individual site, Yew Tree Farm is an important part of local ecological networks linking green spaces in the city with the wider countryside.

The national approach to restoring nature as set out in Government strategies is based on the Lawton Report of 2010, Making Space for nature. This recognises that we need more, bigger, better and connected wildlife habitats to enable wildlife to survive and thrive and cope with climate change. Bigger sites are important because they have larger areas that do not suffer from the "edge effects" of being next to land where harmful pesticides, disturbance, or other activities which damage wildlife are ongoing. They can also support larger populations of species and reduce the risk of events such as disease or inclement weather causing a species to be lost from the site entirely.

Yew Tree Farm is at risk of going in the opposite direction and losing areas of high wildlife value created by its sympathetic management. As well as the likely loss of wildlife in these areas, this increases the risk that wildlife will decline and be lost from the wider site.

In addition to the ecological imperative to retain the site as a whole, without losing land not development, there is a management imperative as the wildlife value of the site is

dependent on the continuation of sympathetic extensive grazing and the grazed area needs to be large enough for this to remain commercially viable.

For these reasons, Avon Wildlife Trust is opposed to all of the development proposals affecting Yew Tree Farm, including the proposed Redrow development extension in the eastern area of the farm and the extension of south Bristol Cemetery into the northern area and we are calling on Bristol City Council to work with the landowner to ensure that the fields are retained as they are, with a continuation of the current wildlife-friendly grazing regime.

With thanks and best wishes,

Ian

Ian Barrett

Chief Executive

Avon Wildlife Trust

Public Statement of Sid Ryan

28th November 2023

Specific Points

Alternatives

This is the outgoing administration's problem that it had to scramble to patch. The reason this application is being presented to committee as a brewing as a burial emergency is because BCC did not plan appropriately, and let its legal duty to provide burial space rest upon this one risky and controversial project.

The report to committee presents BCC search for alternative sites as if it looked in North Bristol, but finding nothing suitable reluctantly turned to South Bristol Crematorium, but it was set upon South Bristol from a much earlier date.

The ecological reports which form the core of the environmental case of this application were commissioned in October 2019. At that stage BCC intended to have the Final Business Case for the crematorium expansion signed off by cabinet in March 2020, efforts to look for alternate sites between 2020 and 2022 are not relevant to the issue here.

The decision that there were no suitable sites in North Bristol was a political one. I don't believe we have seen the basis upon which that decision was made, only assurances from the officers that, unfortunately, only one viable site exists in Bristol. Where that leaves us when the Cemetery fills again and requires another chunk of Yew Tree Farm is unclear.

In anycase, BCC's attempts to look for alternative sites all appear to have happened after it selected this one.

Consultation

With regards to consultation with the key stakeholder in this application, the officers report notes first says Mrs Withers account is not representative, and then boldly states Yew Tree Farm was the first stakeholder engaged, with 'two site visits' in May 2021 and May 2022'. This is despite 'The extent of site works and infrastructure to be delivered in this first phase of the expansion will be determined in March 2020.'

Further distorting the idea that these two meetings represent a consultation about a proposed development, and a full and frank discussion of how development would impact a heritage asset, is that I would imagine the more pressing agenda item for BCC at those meetings would be renegotiating/terminating/informalising(?) her contract to grazing rights - a big stick to wave in her face threateningly while asking for her consent.

The fact that the agenda for these two meetings was so packed means that BCC did not have an opportunity to mention that actually it had decided it no-longer liked scrubland, and that it

would be using removal of it as further justification for the application, and that the Mayor and officers would score political points about it through implication that Catherine was a poor caretaker/tenant/non-contractually-obligated-bystander and was personally responsible for letting this bramble menace expand.

Consultation was far too late and far too brief. BCC still doesn't understand the impact on the financial viability of Yew Tree Farm, let's not pretend Cabinet gave it a second thought when this was signed off over three years ago.

Loopholes

Four months after the 'first consultation' about developing the farm, Tom Renhard opens his speech to the Green Spaces Motion with [this](#):

"I would like to start by referring to the main point of the motion which does focus on Yew tree farm and place on record my support for the campaign to protect Yew Tree Farm. Houses should not be built there and we will do all we can to prevent development there that's a cast iron commitment that the mayor has recently stated"

Now, we can equivocate and say Cllr Renhard was talking just about *houses* being developed on the site and that the cemetery expansion is entirely different. But no-one offered the actual fine-print that there is a specific carve-out from Greenbelt development regulations for Cemeteries and that BCC was taking advantage of it to submit this development.

In a similar equivocation, in Paragraph 4.1 of the officers latest report says that 'the use of Green Belt land as a cemetery is considered to be an appropriate use.' I think what it actually means is that cemeteries are one of the exceptionally few *permitted* uses. Whether or not it is 'appropriate' is a matter for the Committee.

The fact that cemeteries are the loophole from Greenbelt development is why the officer is so confident about not setting a precedent for further development later in paragraph 4.1. But this narrow point around greenbelt regulations fails to engage with the precedents being set around development onto SNCI sites.

While this loophole around cemeteries is indeed very clever from a planning and political messaging perspective, from the outside it looks like hypocrisy. The Green Spaces Motion motion, supported by the BCC administration, should have triggered a frank admission that development of the cemetery into Yew Tree Farm would nevertheless go ahead - especially with Catherine - but it didn't.

I can only assume that BCC foresaw the controversy that might cause, so elected to keep quiet about it and let your committee deal with the public frustration instead.

Broad concerns

Success and failure

I've taken several public authorities to court over their refusal to provide information via FOI so I am quite used to seeing public officers laying out a reasoned and defensible position that they nevertheless shouldn't. This planning application seems like one of those.

It is somewhat remarkable to me that there exists a loophole for developing over green belt and SNCI land so long as you are doing it for a cemetery. But just because you can doesn't mean you should.

As I understand it, the officers have given the committee reasons why they can approve this application, because that's the job they have been asked to do by the Mayors Office. But there is more than enough in the officers report to refuse this application too, so you can ask that BCC revisit the issue of finding more burial space - because it shouldn't go ahead.

Whatever merits and demerits of expanding the cemetery in planning terms, as a project that BCC is going to be trying to push forward for the next 15 years this is toxic. The foundations for this application are lacking or tainted, and that will harry the Council over and over again at challenge after challenge.

Granting this application won't be success for the BCC projects team, it will just be the beginning of a long and tortuous process whereby everything it does is challenged procedurally, legally and in the press - because the applicant has tainted the process and lost the trust of its major stakeholders - all of whom it relies upon to maintain SNCI status.

There have been many concerns identified with this application, large and small, but what they all show is an applicant that has overlooked a lot of issues. Having had these issues pointed out, the applicant doesn't seem contrite or conciliatory, but seems even more strident that it is right and everyone else is wrong.

Refusing this application

A serious plan and a serious applicant would not result in the 'most controversial' planning application Cllr Barclay has ever seen. The applicant has delivered a poor product that doesn't meet the standards the people of Bristol expect. The application should be refused.

Conditions cannot save this application because there is nothing you could impose that would give the application what it is most lacking - legitimacy. All this committee can do is sign-off on everything done to date, and hope that you don't have this applicant back next year again to ask why none of the things you asked for have been done, like you did last month.

So you should instead refuse this application, and ask for a fresh start. The Council's existing commitments to protect the Greenbelt should have stopped this project long before it reached

your committee. But now it is here anyway, you're not obliged to follow the rails which have been laid down for you.

If it was me, I would fail this project because no matter what you're assured by the applicant, this project is actually already ruined before it has even started. If it doesn't fail today, it will fail later and approving the project will look very regrettable. The only way I see a cemetery expansion going forward at all smoothly is with a complete reset, and the development of a long-term strategy rather than a half-baked temporary solution.

If I was a councillor refusing this I would do it because the members all voted on a Green Spaces policy which said to do no harm to the Greenbelt and SNCIs. I think it's cowardly to weasel out of that commitment by pointing to this odd loophole around cemeteries and I think Bristolians will feel rightly cheated by it.

If I was an ecologist I'd say because the applicant has not fully considered the impact it's years of razing and re-development is going to have on the environment, both it's plants and animals. The applicant hasn't shared any of the ecology reports which back up its assertions that there is any decline in the ecological value of the land, which in anycase can only be explained BCCs lack of interest in its management over the past few years. BCC cannot now give assurances that it will develop a credible plan to ensure SNCI status is retained.

I wouldn't claim to be an expert in planning law, but it seems to me that the book is very thick and I'm surprised the officer's report couldn't find more material which is adverse to the application succeeding, or indeed reasons to refuse. Nevertheless, what the officers report has assembled seems to be more than enough reasons to refuse.

A lack of concern for the impact on local heritage assets

The main one, and what I might say if I was a planning officer, is that what makes Yew Tree Farm a heritage asset is that it is a farm. This asset of the city is worth nothing to anyone if the tenant farmer is put out of business and has to sell to someone who just wants a farm for the novelty and a barn to store a sports car. That owner will not spend their time promoting Bristol's last farm to the world.

While the Officer's report focuses on the *building* as a heritage asset - what it overlooks is the value of the farm. The value of the land around Colliers Brook is not just that it is an 'open and verdant surrounding' (whose best sightlines from the public path will be blocked by the new cemetery boundary). The value of this land is that you can also say hello to the cows.

The heritage value of a farmhouse without a farm is basically zero. Yet BCC has put little thought into the impact on the farmer here.

It is ludicrous to state as the officers report does 'that the proposal would have **no** adverse impacts on the neighbouring assets'. This shows that far from giving the impact on heritage assets 'considerable importance and weight', the applicant has gone out of its way to overlook

the many responses to the public consultation which outline the risks and harms - to try and present a one-sided view.

Viability of Yew Tree farm is the key issue here, and as I understand it the committee has only heard from the one expert on the economics of running one. For the officers report to keep going on about percentages of grazing land available (land which it only keeps available by demolishing established scrubland habitats) as if that was even the half of the impact this change might have displays a sort of arrogance which is distasteful when it did not consult with Yew Tree Farm for a year after the business case for this development was approved by Cabinet.

Bristol City Council isn't obliged to protect anyone's business, and it is not obliged to give Yew Tree Farm grazing rights. But it is obliged to protect the interests of Bristol's residents and protect the things that they find important. Having a link to our agricultural past, food-production present and a more sustainable farming future is important and is an asset worth protecting.

Conclusion

Bristol clearly needs more burial space, and I appreciate that BCC has a lot riding on this cemetery expansion. But this committee's role is to judge applications based on their merits, it is not here to make accommodations for an applicant that has allowed its entire strategy for burial provision to rest on this flawed foundation.

The long term interests of the Bristolians here today and the ones in the future is for a well reasoned long-term plan for accommodating all the burial practices of Bristol's wide array of faiths. This is vital. This application is not part of a long term strategy, it has not been thought through and what happens next for cemeteries does not seem to have been explored.

Loss of this living land for dead land is forever. This application solves a problem only for a decade or two, that is if the project doesn't fail along the way. If this is approved I think Bristol will come to find it has lost its last farm and its SNCI status for nothing, and it still has to expand into another cemetery site shortly away.

Refuse the application and start again. Bristolians want a different way for its council to take forward projects and make decisions, and you have the mandate and the lawful planning reasons to refuse to take a project for cemetery expansion further without a genuine acknowledgement of the mistakes made in the course of this application and a complete reset of a key relationship which has been made toxic.

It's in Bristol's long-term interest for BCC to honour the full council motions it makes. For the SNCI status of the area to be jealously guarded. And for a working farm to remain in Bristol as a heritage asset. The current application doesn't give sufficient assurance those interests can be protected, no conditions are possible to resolve these concerns and the application should be rejected.

Statement – DB 29/11/23 Cllr Christine Townsend

My objection remains that of the previous meeting where it was evident that officers had NOT looked at other sites for burial and consideration was only that attached to existing cemeteries.

It is stated in section 4.7 of this report that 'The Council undertook assessment between 2020 and 2022 of potential sites for new cemetery provision in North Bristol' this statement was not in the original application and is a claim only now being made.

There is zero supporting evidence that backs up the claim that assessments were carried out. Where are these assessments? What do they say? How do you know as committee members that other sites are not potentially suitable? Answer you don't because the evidence is not within these papers – this is very poor administration on the part of the this planning department and an insult to your intelligence.

Claiming something within a legal process that cannot, or is not, backed up with evidence is not to be relied on. The author of this report is fully aware this is a legal process and the need for evidence is paramount to protect the integrity of that process. So where is the evidence of this claim? I request that you ask where these assessment reports are why it is not reproduced as part of this application for public consumption and scrutiny.

Furthermore, that same statement confirms to us that no attempt to investigate south and east Bristol for suitable sites has been carried out.

This site is an SSCI and unless and until ALL possible alternatives have been fully investigated and excluded the protections of the ecology and wildlife must be upheld. This applicant has failed to ensure all other alternatives have been explored and this work must be done first.

Good afternoon,

I would like to submit the following statement to object application 22/05714/FB South Bristol Crematorium.

I am putting in this statement because I have serious concerns about some of the comments made by the applicant regarding the mitigation of the impact on the SNCI.

There remain serious concerns about land contamination from the burials and whether this will also seep into Colliter's Brook, a key watercourse that runs through Bedminster and Southville and in to the Avon Gorge SSSI.

There is much talk about carefully removing the topsoil of land during burials and then carefully replacing it to mitigate the damage to biodiversity. However, at the same time the creation of an attenuation pond will see a large amount of topsoil removed with obviously no ability to carefully replace it – this cannot cause anything but permanent harm to the biodiversity of the site. The attenuation pond is there only for the benefit of the crematorium expansion, it is not there to improve the SNCI.

It has been made clear that the future management of the site requires the continuation of the grazing of the site in a manner supportive of nature – yet Bristol City Council admits it has no tenant farmer and appears to be prepared to make the only viable tenant's farm operations unviable in pursuit of this expansion.

In addition, the planning committee is being asked by planning officers to put its trust in the council's ability to preserve the SNCI status of the land in question – yet just a short distance from this application site, the council has incompetently allowed the destruction of an ancient hedgerow and has failed to provide enforcement of clear breaches of the default permission allowed by this incompetence.

The proposals in front of you largely predate the 2021 election, since then Bristol City Council has seen a major change in the political makeup of the council, leading to major changes in attitude and approach to the development of SNCIs. Councillors have been prepared to stand up to publicly defend green spaces, have voted in the council chamber to protect green spaces, and have voted through a Local Plan submission which seeks to remove key green spaces from allocation for development.

As committee members, you have been provided with multiple material planning considerations for why this application should be refused, and why there is a need to develop a strategic approach to burials for residents in Bristol, which we can all agree on is important. But we need a strategy that is not just a short term stop gap solution, but offers a longer term viable option that does not pit the burial of the deceased against the future of the living.

Cllr Emma Edwards (she/her)

Green Group Leader

Green Councillor for Bishopston and Ashley Down

Co-Shadow Cabinet member for Transport and Active Travel

To whom it may concern,

I am getting in contact as I would like to strongly object to the proposed expansion of the crematorium into the historic Yew Tree Farm in Bristol.

Subject: 20/05714/FB expansion of a crematorium into yew tree farm.

The primary reasons that I am objecting to the crematorium expansion are:

- the cemetery is highly disruptive and will make the farm completely unviable
- the cemetery will destroy and kill irreplaceable mature trees
- the cemetery will disrupt an important habitat for local wildlife
- the cemetery will be built on, and cause damage to an SCNI
 - Cutting down mature trees and meadows has major negative environmental impacts. Mature trees play a crucial role in carbon sequestration, so their removal contributes to increased levels of carbon dioxide in the atmosphere, which in turn contributes to climate change
 - Meadows are important habitats for numerous species, and their destruction can lead to loss of biodiversity.
 - Additionally, trees and meadows provide essential ecosystems regulate water flow and prevent soil erosion.

The proposed cemetery is not a responsible use of protected land. Not only will it have devastating effects on a heritage, family run working farm, but it will also have adverse effects to the local nature to and contribute to detrimental environmental impact.

These can be mitigated by objecting to the proposed cemetery expansion.

Thank you,

Kind Regards

James Holland

Dear sir / madam.

I strongly object to the proposed expansion of the crematorium into the SNCI at yewtree farm in south Bristol.

I am not convinced that other appropriate sites have been considered . I am also concerned about dubious ecological report submitted by yourselves. The importance of this valuable ecological site seems to have been completely ignored and the mitigation you have supposedly put forward is nonsense, you cannot destroy something that is already doing its job to help the (in your own words) ecological emergency that exists in Bristol by replacing it with something that would take upwards of 40 years to start doing the same job. If (again in your own words) “ bodies will be piling up on the streets” I would suggest you try much harder to resolve the problem and not just take the route of least resistance.

John Beard

Chair,

There is a mistake in the minutes for the DCB 18th October 2023 meeting.

I don't mean that that don't accurately reflect what was said, I mean I believe there is a mistake in what was said. In particular 'In response to a question the Chief Planner and Head of Planning confirmed it is Council Policy to follow the agreed procedure relating to the "cooling off" period and it should therefore be followed.' does not appear to be true.

There seems to be some confusion about this. I've done a bit of a dive, and have a theory as to where this confusion originated.

In July 2019 at Audit Committee, there was a proposal made by the then chairs of the Development Committees, councillors Don Alexander and Tom Brook, that there should be a 'cooling off' period when a development committee refuses an application. That proposal is can be found here: <https://democracy.bristol.gov.uk/documents/s34769/13%20-%20Appendix%20%202.pdf>

The Audit Committee said that it wasn't the right place to be decided, and so rejected the proposal.

Councillor Clive Stevens made a very strong public forum statement at the Growth and Regeneration Scrutiny Commission in September 2019 that mentioned why the 'cooling off period' was such a bad idea:

"I was horrified to see on page 31 that a key measure of success of this administration is the percentage of major applications approved.

Major applications are generally approved by Development Committees which are supposed to be independent decisions taken by Councillors based off independent Officer advice.

My horror comes from the possibility that this measure is putting Planning Officers in a conflict of interest situation. They are supposed to be assessing whether a development meets planning policy but in the back of their mind they know one of the department's measures of success and possibly even their own personal objective is influencing them to favour approval over and above the principle of sustainable development.

There are huge amounts of money to be made by YTL, L&G and lots of other developers with so much to gain from "subtle" changes to policy. Indeed some in Bristol would be justified in wondering whether both land and now democracy seems to be being sold off to the highest bidder." - Clive Stevens

My understanding is that proposal _would_ have required a cooling off period.

At the Audit Committee in March 2020, as part of the Constitution update, there was another proposal to alter the planning rules.

I don't know if Councillor Stevens agreed with the proposal, or if his mind was distracted by either it being the last Council meeting conducted in person before Covid-19 hit, or whether he was distracted by the discussion of "Bristol Energy Company and Statement of Accounts - verbal update" but either way, this proposal passed.

By carefully going through the rules, Council Poultney showed this committee the change that was been adopted into the BCC constitution does not require a cooling off period.

I think that what has happened is that people misremembered which alteration to the 'debate and decision process' had actually been accepted, and wrongly thought the first proposal had been adopted.

These things happen and it's a good demonstration that even with the best of intentions, Officers are not omniscient.

On that note, I think an Officer made a mistake saying that harm to an SNCI site can be balanced out by planting trees elsewhere.

Sites of Nature Conservation Interest are sites which contain features of substantive nature conservation value. You don't get that from just planting a few trees. You need unusual circumstances and a lot of time for a piece of land to gain 'substantive nature conservation value'.

The bucolic beauty of Yew Tree farm is a human-made environment. It depends on the land being used as a farm, with a hard-working farmer maintaining the land.

If the farm is not viable, and is forced to close, then the whole of the SNCI will suffer. Taking land away from a small farm to be used for other purposes, risks the viability of that farm. That can't be balanced out by promising to plant some trees.

There is a useful phrase in computer programming: "No is temporary, yes is forever."

cheers
Dan
Ackroyd