

**Fact Finding report and analysis
in respect of the Decision making
for the South Bristol Cemetery
Expansion and associated issues.**



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Executive Summary

Terms of reference for this report

This report was commissioned by the Council's Chief Executive and the Monitoring Officer to consider the following:

1. Establish a timeline of all decisions (whether by officers or members) relating to Yew Tree Farm and neighbouring sites, from the perspectives of planning, land ownership and burial service provision.
2. Identify any deviation from high standards of decision making and implementation that may have impacted upon public confidence in the council's handling of the issues of nature conservation/open space/biodiversity/ecology/burial capacity, including lawfulness of decision making.
3. Evaluate the extent to which the council and its officers have been transparent/accountable in its decision making.
4. Make recommendations going forward, including the identification of any lessons learned.
5. The report will be published to ensure the desired level of transparency in the council's decision-making process.

Analysis of decision making

1. Agricultural Lease/ Grazing Licence.

In relation to the termination of the agricultural lease in relation to the land adjacent to South Bristol Cemetery to facilitate expansion of the Cemetery, notice to quit was served in a legally and procedurally compliant way.

A grazing licence was entered in to on the 30th April 2024 with GR & EK Withers Ltd for the period from Thursday 2nd May 2024 to the 31st December 2026. This was lawful and properly taken under the Council's scheme of delegations.

The decision to grant GR & EK Withers Ltd was based on the fact this company was the existing grazier of the Council's land and the grazing licence was required to regularise the position.

2. Cabinet decisions.

1st Decision – 3rd March 2020

2nd Decision - 23rd January 2024

Legal comment was provided in both of the reports to Cabinet.

Stakeholder engagement:

The report to Cabinet in January 2020 stated that consultation would take place with relevant stakeholders prior to the submission of the application for planning permission. There was no duty to consult but engagement and consultation took place and the report reflecting the views of those consulted/engaged with was included in a report considered by Cabinet in January 2024. Further stakeholder engagement is proposed in the development and finalisation of the site management arrangements.

Equality Act Duties

Both Cabinet reports included an Equalities Impact assessment so that the decision maker(s) were aware of and had sufficient information to be able to comply with the public sector equality duty to have due regard to the need to eliminate discrimination, harassment, and victimisation and advance equality of opportunity; and foster good relations between persons who share a relevant protected characteristic and those who do not share it.

Environmental Impacts

Both reports included an Environmental impact assessment that set out benefits, enhancements, adverse impacts and mitigating actions across a range of environmental issues so that the Cabinet were fully aware of these and could take them into consideration in coming to their decision.

The summary of the second assessment stated:

The South Bristol Cemetery Expansion project will include the implementation of an extensive range of ecological mitigation proposals. These mitigation proposals were detailed in the Planning Application approved at Committee in November 2023. The project will be preparing detailed documentation including a full 30-year SNCI management plan and a Construction Environmental Management Plan which combined will detail the full enhancement, mitigation and management arrangements to complete the associated works. These documents will be submitted for condition discharge approval from the Planning Authority ahead of the associated works being undertaken.

Cabinet decisions on both occasions were reasonable and compliant with legislation and the constitution, in particular the principles of decision making set out in Article 14.02 of the constitution and the Access to Information Rules.

3. Planning application.

Legal Officers were asked to advise on reasons for refusal following the committee decision to defer the application on the 6th September and how to respond to comments about the SNCI policy.

In relation to the meeting on the 6th September that was deferred, complaints had been made about access to ecology reports / the SNCI policy and issues around the grazing licence that was held for the land that was to be the subject of the extension of the cemetery.

A subsequent email from Bristol Tree Forum (BTF) was received prior to the Committee meeting on 29 November, which raised legal issues about BCC's handling of the application and queried whether the application should be deferred again.

It was alleged that BCC's failure to include a 2022 ecology report with the South Bristol Cemetery (SBC) officer report (DCB Committee 29 Nov 2023) breached the requirements of S100B Local Government Act 1972.

The view was taken that there was no breach of S100B in that there had been no failure to include within the agenda papers the documentation specifically required by Section 100B.

The report to the November meeting did not include possible reasons for refusal, although this was what was required on 6th September when the application was previously considered by Committee. Officers considered in detail the reasons for refusal that were suggested by the committee on the 6th September but concluded for each of them, that they were not material planning considerations on which it would be reasonable in this case to recommend refusal of the application.

The 2022 ecology report did not appear to be available on-line. This was subsequently addressed, and the report was placed online before the Committee hearing took place.

Following the Committee meeting, a legal officer viewed the recording of the meeting and did not detect any bias or predetermination in respect of approval of the application.

There was an allegation that the decision was ultra vires. This was not considered to be a valid point from a legal perspective. It was noted that a claim had been made that Biodiversity net gain was not properly considered. Specific questions had been raised about this and officers responded in writing and addressed supplementary questions. It was clarified that at the first meeting officers had conflated BNG & impact on the SNCI - and at the second committee meeting made it clear that they had considered both separately and set out why they were satisfied on both points.

In summary

The principal allegation made by BTF was found to have no merit and there was no reason to remove the application from the agenda on 29 November.

There were other potential issues with BCC's approach to the application in relation to points raised by BTF but these were resolved by officers.

There was no planning policy requirement to demonstrate that other sites had been considered before allowing the development of the site under consideration. As such, the scheme needed to be considered on its own merits.

There appeared to be no indication of bias or predetermination by Members of the committee on the 29th November in favour of the application being granted.

Overall, the decision taken by the Development Control Committee on 29 November 2023 properly assessed the issue of Biodiversity Net Gain, took proper account of the effect of the proposed development on the SNCI and addressed all late objections. In addition, the resulting planning permission dated 22 April 2024 specifically included conditions securing the Landscape and Ecology Management plan and also a Construction Environment Management Plan.

4. Application to remove a section of Hedgerow.

The application, dated 7 February 2023, was made by The Newcombe Estates Company Limited regarding the removal of a section of hedgerow that did not form part of the area being considered for cemetery expansion.

The hedgerow was located on the access road to Yew Tree Farm and formed part of the hedgerow enclosing the field adjacent to Yew Tree Farm.

An error was made in the processing of an application/notification of hedgerow removal under the Hedgerows regs 1997. The error didn't constitute a decision under the Regulations but the timeframe for making the decision had passed so that the hedgerow removal was approved by default.

Council consent was not needed where certain exemptions apply. The applicant/agent had not provided satisfactory evidence to show an exemption applied (as that 'evidence' it was contradictory) but the default approval applied.

Hedgerow removal subsequently took place which was different in location and length to that 'consented'. A further submission was also made by the applicant for this revised work, this time detailing an exemption that applied (a new hedge opening to replace an existing one). The exemption appeared to apply but needed clarification with the applicant given previous contradictory information. On receipt of further information, it appeared the exemption applied

so that no consent was needed, subject to the applicant planting a replacement hedge within 8 months and this should be monitored as failure would be an offence.

Further hedgerow works took place. Following a site visit it was confirmed the hedges had been coppiced but not removed, therefore the Hedgerow Regs did not apply. Officers advised on ecological issues/offences. A report was made to the Police and shared with BTF.

In summary

The initial hedgerow application was not subject to a decision as the time limit expired so that the default approval applied (due to an internal processing error).

Regarding the subsequent notification in November 2023, relevant questions were asked of the applicant to ensure, as far as possible, that the exemption applied, and that the applicant complied with legal requirements.

In relation to the other queries on additional hedge works and the replacement hedge, site visits were undertaken before a decision was made on how to proceed, based on those expert views.

Nancy Rollason

Head of Legal Service

6th August 2024

Appendix 1

Background

The council owns and runs South Bristol Cemetery and Crematorium and also owns the land adjacent to the Cemetery. The adjacent land is the site under consideration for the South Bristol cemetery expansion. It is in the Green Belt and includes Colliters Brook, an area designated as a Site of Nature Conservation Interest (SNCI).

The provision of facilities for cemeteries is an acceptable use in Green Belt areas provided the facilities do not conflict with the purposes of including land within it.

The Council has a general power under Section 214 of the Local Government Act 1972 to provide cemeteries and crematoria. As the land is currently used for agricultural purposes, use as a cemetery requires planning permission.

The Town and Country Planning General Regulations 1992 enable the Council - as local planning authority - to determine its own development proposals on land in which it has an interest.

The adjacent area was leased by way of an agricultural tenancy in 1990. This was sublet to Yew tree farm – it is not clear when this happened.

Between 2017 and December 2018 the Council went through an extended process to consider the strategy and options for the future of cemetery and cremation provision in the city given the critical shortage of burial spaces and the need to improve the Cremator in North Bristol to meet new standards for mercury abatement. The Service commissioned sector specialist consultants to undertake a Service Review, which considered the requirements for future burial space and cremation provision in Bristol. The report identified the potential for South Bristol Cemetery to be expanded to provide additional provision for the South of the

City, with an estimated cost of £1.4m. For the North of the city, expansion is more complex, due to the constraints of the existing sites, in particular being land-locked by surrounding uses, and more detailed feasibility work to explore options was required in order to identify a preferred solution.

In February 2019 Full Council approved provision of £6m allocation of the Capital Programme for future investment in Bristol's Cemeteries and Crematoria provision.

Assessment of options continued for potential sites for new cemetery provision within North Bristol to spread ongoing burial demand and provision across the City. The conclusion of the assessments undertaken were that no sites could be identified, which met suitability criteria for new cemetery provision.

Cemeteries are a greenfield use, and a completely new development would result in loss of a larger area of green space and additional funding to provide the commensurate infrastructure and facilities than those required to expand the existing cemetery provision. Development of new facilities commensurate with those provided at South Bristol Cemetery would result in considerably greater embodied carbon in construction materials, and significantly greater road movements for construction phase transportation creating additional impacts on surrounding communities.

Burial and Cremation practice is governed and restricted by statutory provision and the shortage of burial space is a national issue. Under existing law, the opportunities for development of new burial plots within previously unused areas of existing cemeteries have been exhausted and there are no current alternatives to develop new burial provision. There are also restrictions in terms of the expansion of the North Bristol Cremation provision.

In the longer term it is expected that outcomes from a Law Commission Review 'A Modern

Framework for Disposing of the Dead' may lead to legislative changes within the next decade that could provide future opportunities and flexibility to the Council.

The review will not be completed in a timeframe which would offset the requirement for the new proposed burial and cremation provision, however outcomes will be able to help shape future strategies for how longer-term provision is provided to follow on from the additional burial plots provided through the cemetery expansion.

A report was taken to Cabinet in March 2020 to recommend the expansion of South Bristol Cemetery into the adjacent land and apply for planning consents, and to undertake further feasibility work for options for provision in North Bristol given the more complex issues involved. Cabinet accepted the recommendations and delegated authority to officers to proceed.

The expansion in South Bristol will be undertaken in two phases, the first phase will be completed in 2025 and provides provision up to the year 2039 of 1,550 standard burial plots, 260 baby burial plots, 800 ash interment plots and 230 memorialisation plaques. Phase 2 provides a further 1,300 standard burial plots from 2039 onwards, adding a further 10 to 15 years provision. Undertaking the development in two phases manages the capital expenditure required and will allow the grassland identified for phase 2 to be made available for grazing for a longer period.

As the Cemetery expansion is partly within Collitor's Brook SNCI, this requires mitigation to be provided. A number of ecological assessments and surveys have been undertaken as part of the cemetery expansion work which have identified enhancement and mitigation measures which will be introduced as part of the cemetery expansion work across the site and the wider SNCI. These have been secured through the planning process.

As reported to Cabinet in January 2024, work is being finalised on a Landscape and Ecology Management Plan (LEMP) which contains a full 30-year SNCI management plan together with a Construction Environmental Management Plan which combined will detail the full enhancement, mitigation and management arrangements to complete the associated works. These documents will be submitted for condition discharge approval from the Planning Authority ahead of works being undertaken.

This will secure the introduction and subsequent maintenance of enhancement and mitigation measures for not only the cemetery land but also the wider SNCI. Both phase 1 and phase 2 of Area 3 of the expansion are within the SNCI.

The forecast net reduction in available grazing land is 4% for the first phase of development, and a further 10% (total 14%) when the second phase is developed, which is expected to be implemented between 2034 and 2039.

Following the Cabinet decision in March 2020, engagement and consultation took place with community groups and stakeholders in relation to proposed plans and is reported in the statement of community involvement in the papers for the Cabinet meeting in January 2024. Further stakeholder engagement is to be undertaken in the development and finalisation of the site management arrangements.

At the January 2024 meeting, Cabinet approved the utilisation of Strategic CiL money to fund phase one of the cemetery expansion noting that further approval would be needed for phase 2. Officers are continuing to assess the options for cremation provision in the north of the City.

Appendix 2

Timeline

26 February 2019

Full Council approved capital funding of £6m for Cemeteries and Crematoria service update and expansion.

3 March 2020

Cabinet Decision.

Cabinet accepted officer recommendations in respect of the expansion of South Bristol cemetery and development work in North Bristol.

Cabinet:-

1. Approved £1.7m Capital expenditure for Cemeteries and Crematoria, including of £1.4m for extension of burial provision and associated quality improvements at South Bristol Cemetery and £0.3m for undertaking feasibility and options appraisal work to inform a Business Case for future North Bristol and cemetery provision.
2. Delegated authority to the Strategic Director for Growth and Regeneration, in consultation with the Cabinet Member for Finance, Governance and Procurement and the Director of Finance:
 - a. to agree the Final option to be implemented at the South Bristol Cemetery once the concept stage proposals have been completed and assessed.
 - a. to take programme and financial decisions within the budget envelope and scheme of delegation as the project develops.

[The Future of Bristols Cemetery and Crematorium provision Executive Summary v.8.pdf](#)

[Appendix A - The Future of Bristols Cemetery and Crematorium provision v.5.pdf](#)

The Cabinet paper proposed consultation based on the development of design options at South Bristol Cemetery and feasibility work for North Bristol.

June 2020

The Council attempted to negotiate a surrender of the agricultural tenancy. No progress was made so one year's notice to quit was given to terminate the agricultural tenancy under delegated powers.

June 2021

The agricultural tenancy was terminated.

The tenancy prohibited subletting, but the tenant had sublet the land to Yew Tree Farm in contravention of the covenant and without the Council's consent. The term of Yew Tree Farm's sublease is unknown but may have pre-dated the lease entered into in 1990.

At a meeting with the Farm representative following notice to terminate the tenancy it was verbally agreed that the Council would provide continued access to graze the Council land to Yew Tree Farm ahead of a formal lease or licence being developed. It was discussed that an ideal approach would be for the Farm and Council to work collaboratively together to allow both the delivery of the cemetery extension and facilitate Yew Tree Farm grazing the land ahead of works, and as far as possible during construction.

December 2021 – April 2022

A draft grazing agreement was drafted. The Mayor's Office requested that Officers did not formalise it at that time.

December 2022

Officers wrote to the Farm representative to clarify the existing grazing arrangements:

“The Council has not yet entered a formal farm tenancy, or grazing licence with you to supersede the sub-tenancy you had, which ended in June 2021. We verbally agreed for your existing grazing to continue, until such time as a formal agricultural tenancy / licence is issued / agreed covering this, or you are given notice to quit, or the land is required for development of the cemetery expansion. Use of the land is limited to agricultural use associated with cattle grazing, for which you will hold all appropriate insurances, and does not infer any additional or longer-term rights. We discussed that we would look to as far as reasonably possible to agree arrangements for continuation of grazing the land not required for the cemetery development during and after the works and would aim to provide reasonable notice of any change to these arrangements”.

It was accepted and acknowledged there was only informal grazing access and no formal lease existed at that time.

The Council at this time believed the cattle grazing the land belonged to the representative that Officers had been dealing with. It is now the Council’s understanding that they did not own the cattle but that the cattle were owned by a relative.

29 November 2022

A Planning application was made by the Council for full planning permission for the use of land designated as Green Belt for the expansion of the existing cemetery to provide new burial and memorial plots with associated roads, footpaths, parking, drainage infrastructure, fencing, landscaping and furniture. This entailed the extension of the cemetery into two currently undeveloped areas, and the provision of an attenuation pond* in a further area to mitigate the identified risk of flooding on the site. The existing facilities were deemed sufficient for the expansion land.

*An attenuation pond is an engineered structure designed to manage and control excess rainwater and help prevent flooding. The pond acts as a temporary reservoir, strategically placed to collect and detain rainwater runoff and slowly release it into the drainage system or surrounding ground. During heavy or prolonged rainfall, they collect excess water to prevent the drainage system from becoming overwhelmed.

7 February 2023

Newcombe Estates Company Limited made an application for Hedge removal to create access to their land where no other means of access was available.

The section of hedge to be removed was located on the access road to Yew Tree Farm and formed part of the wider hedgerow enclosing the field adjacent to Yew Tree Farm. It was not part of the site under consideration for the expansion.

6 September 2023

The application for full planning permission was heard by Development Committee B.

[4 22.05714.FB - South Bristol Crematorium Cemetery Bridgwater Road.pdf](#)

[ModernGov - bristol.gov.uk](#)

The officer recommendation was to grant permission subject to conditions.

The Committee Decided - (7 for, 2 against) that the application be deferred pending a further report to be resubmitted at a future meeting setting out suggested reasons for refusal on the basis of the issues raised by Councillors at the meeting.

Members had outstanding concerns over the following issues:

- Whether the strategic need for the cemetery was justified and what other areas had been explored?
- Whether there was a harmful impact on heritage assets?
- Whether the correct test had been applied in respect of the impacts on Biodiversity

Net Gain and the SNCI, as well as whether late representations, including those from

Avon Wildlife Trust had been fully addressed.

- Whether the impact on the viability of the neighbouring Yew Tree Farm had been properly assessed?

29 November 2023

Development Committee B reconvened to consider the application for full planning permission.

Officers again recommended to grant permission subject to conditions.

In response to the concerns previously expressed, officers expressed the view in the report to the committee that the previous recommendation was sound, subject to a revised suite of conditions. The update report provided further guidance on the issues raised by Members, and the relative merits of refusing the application on the grounds explored by Members at the 6th September Committee Meeting.

The Committee decided by five to three to grant the application subject to revised conditions and delegations to officers. The conditions can be found from P18 of the report linked here:

[4 22.05714.FB - South Bristol Crematorium Cemetery Bridgwater Road.pdf](#)

The minutes can be found here:

[\(Public Pack\)Minutes Document for Development Control B Committee, 06/09/2023 18:00 \(bristol.gov.uk\)](#)

23 January 2024

Cabinet decision

[Decision Pathway Report for South Bristol Cemetery Expansion V1.1 19-12-23.pdf](#)

[ModernGov - bristol.gov.uk](#)

Although authority had been delegated to officers by Cabinet to agree the final option at South Bristol Cemetery to be implemented once the concept stage proposals had been completed and accessed, the decision was referred back to Cabinet as the proposed option required additional budget approvals beyond the previously approved level of delegation by Cabinet.

Following the Cabinet meeting in 2020, engagement and consultation took place with community groups and stakeholders and is reported in the statement of community involvement which was included in the papers for Cabinet to consider at the meeting.

<https://democracy.bristol.gov.uk/documents/s91639/SBCE%20Statement%20of%20Community%20Involvement.pdf>

Cabinet

1. Approved the use of Strategic Community Infrastructure Levy in relation to Phase 1 of South Bristol Cemetery Expansion.
2. Authorised the Executive Director Growth and Regeneration in consultation with the Cabinet Member Public Health and Communities to take all steps required to spend the Strategic CIL (Community Infrastructure Levy) allocation and procure and award the contracts for the Phase 1 works to deliver the South Bristol Cemetery Expansion project.

3. Noted that a further report will be brought back in accordance with the decision pathway in relation to the Phase 2 development for Bristol Cemetery Expansion Works.

22 April 2024

Notice of planning consent was issued and published.

Objections were received at a later date that BCC did not put the notice of decision up on to the planning portal in a timely manner and as a result they had been deprived of the opportunity to challenge that decision. Officers confirmed there is a full audit trail to demonstrate the notice of decision was put up on the portal when the notice was issued.

30 April 2024

A Grazing licence entered in to between Bristol City Council, and GR & EK Withers Ltd to permit grazing on the adjacent land from 2nd May 2024 to the 31st December 2026 under specified terms and conditions. This decision was taken on the basis that it was they who owned the cattle that currently and historically grazed the land.

15 July 2024

As part of the Budget process, Cabinet (23rd January 2024) and Full Council (28th February 2024) approved the allocation of CIL to projects. In addition, Cabinet (23rd January 2024) approved the allocation of £2.4 million Strategic CIL (SCIL) to support the expansion of South Bristol Cemetery.

At its July meeting, the Strategy and Resources Committee noted the planned use of £2.4m Strategic Community Infrastructure Levy (SCIL) for this purpose.

Appendix 3 – Further factual background in relation to the cemetery Expansion.

1. Details of the burial space required at the South Bristol Cemetery, when this will be needed and what will happen if the Council do nothing.

Demand for coffin burial and ash interment plots

Burial plot sales at South Bristol Cemetery average between 100 and 120 new plots per annum – for the year 2023/24 there were 91 new burials plots sold with a total of 150 adult burials taking place including reopening of double plots. The lower-than-average burials plot sales in the year 2023/24 is attributed to the legacy effect of Covid excess deaths.

For comparison new plot sales in earlier years were: 2022/23 = 118 and 2021/22 = 141. Plot sales are influenced by several factors including numbers of reopening burials in other Bristol Cemeteries.

Future use sales are no longer accepted - all plots are sold following a death.

Ash interments (of cremated remains), for the year 2023/24, a total of 141 new plots for South Bristol, of a total of 250 cremated remains buried.

Current availability of burial space

For new burials, South Bristol Cemetery is theoretically full already. Currently nondenominational burials are taking place in areas never planned to be used for burials. Areas of the cemetery designed for public reflection, away from rows of graves, are now being used for burials. This has meant additional drainage has been required and burials are taking place in landscaped areas, close to trees.

In June 2024 there were 228 remaining burial plots mapped (available), so notwithstanding

the above points, there should be space to continue burials up to the end of next year (2025). For simplicity, if we assume 10 burials per month, this gives South Bristol Cemetery 22 months of capacity taking us to around April 2026 at the absolute limit.

Considering operational capacity - To avoid unsightly and dangerous over trafficking of lawns, a cemetery ideally needs three or more burial areas to allow burials to continue through the winter months. Space is needed to allow a rotation of access routes to enable the lawns to recover from the grave digging operations. For this reason, it is necessary to have more than one burial area, especially where the land doesn't naturally drain surface water.

Without utilising expansion provision, at South Bristol Cemetery there is ash interment plot space available for just less than 12 months – up to June 2025. There is potential for limited localised additional space utilisation without expansion, but this is limited and at the expense of the quality of the memorial areas. Demand will be reduced if the plot location is unappealing.

Forecasts

The forecast of provision up to year 2039 of 1,550 standard burial plots can be interpreted as 14 years at an average of 110 new burials per year. Then a further 1,300 plots provide 12 more years taking the provision to 2050. The consented expansion scheme Phase 1 includes provisions for baby burial plots, ash interment and memorialisation plaques.

What will happen if the council does nothing?

Impact on residents

If the council cannot offer new burial provision in South Bristol, the public will be forced to seek alternative cemeteries. For families this may mean splitting their family graves between cemetery locations, so being unable to be buried close to loved ones. Where this is family tradition, this may be upsetting for some families, perhaps more so for cross generational burials. Once a generation starts to be buried in another location, such as BANES, North Somerset, or South Gloucestershire, then the next generation is likely to do the same.

South Bristol Cemetery has good bus connections, road access and parking. Alternative locations will inevitably be more difficult, costly and time consuming to reach from Bristol.

South Bristol Cemetery provides dedicated faith and cultural spaces, without the cemetery expansion the availability and continuity of use of these may be at risk in the longer term.

Impact on Revenue

Redacted

2. The Capacity created by phase 1 and phase 2, that aligns with identified demand

The Cemetery expansion will be undertaken in two phases, the first phase will be available from 2025 and provides provision up to the year 2039 with 1,550 standard burial plots, 260 baby burial plots, 800 ash interment plots and 230 memorialisation plaques. Phase 2 then provides a further 1,300 standard burial plots from 2039 onwards, adding a further 10 to 15 years provision. Undertaking the development in two phases manages the capital expenditure required and will allow the grassland identified for phase 2 to be made available for grazing.

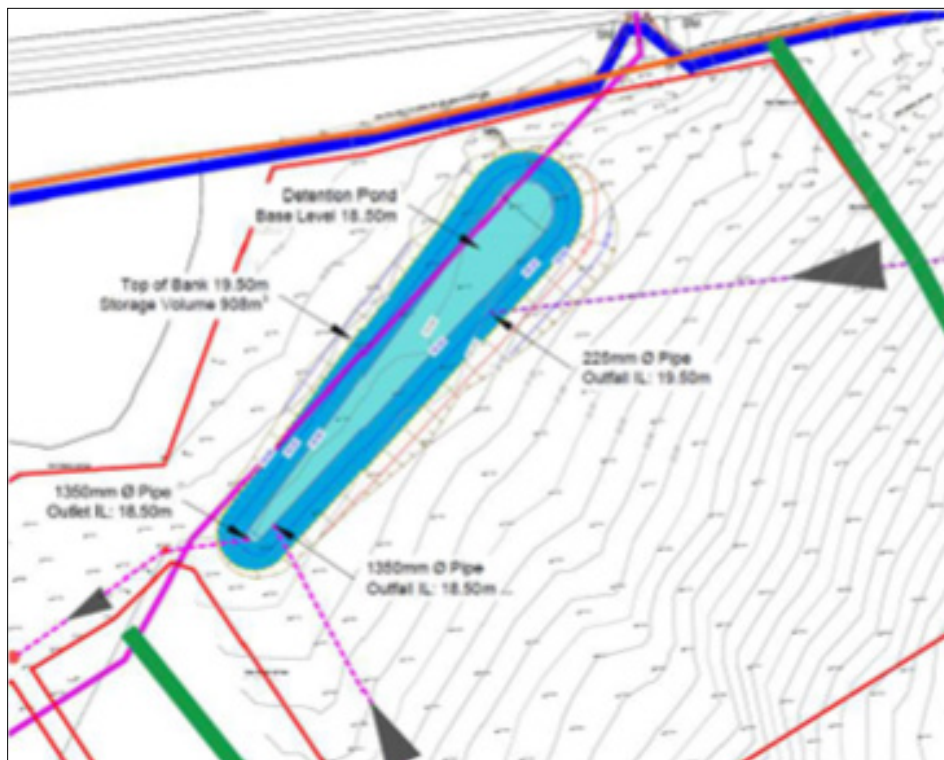
Phase 1 and 2 of the Cemetery expansion is within Collitor's Brook SNCI. A number of ecological assessments and surveys have been undertaken as part of the cemetery expansion work which has identified enhancement and mitigation measures which can be introduced as part of the cemetery expansion work across site and the wider SNCI

Both the new upper and lower cemetery areas are needed in parallel.

3. Will the attenuation pond increase capacity? Is it a planning condition and what is its purpose?

The purpose of the attenuation pond is to prevent downstream flooding following heavy rainstorms. The attenuation pond holds excess storm water, allowing it to be released more slowly via an automatic valve (Hydrobrake) into the downstream watercourse - Colliter's Brook. The attenuation pond is a requirement of the planning consent. As well as the expanded cemetery areas, some of the existing cemetery surface water drainage system will be connected into the new attenuation pond. The cemetery design requires the new attenuation pond for both the new upper and lower burial areas. The attenuation pond is in Area 4 which isn't part of the cemetery. The attenuation pond is part of the drainage infrastructure, with the planned landscaping and planting it is expected to become a wildlife habitat.

The permanent footprint within the SNCI is relatively small. Detail design of the drainage system has reduced the attenuation pond from 3083m³ to 908m³ This is best illustrated by reviewing the following.



Civil Engineers - Jubb Consulting commissioned to review and optimise drainage basin design.

- Review of drainage designed basin volume from 3083m³ to 908m³
- Cost, time, maintenance savings plus reduction in impact.

The attenuation pond is fully landscaped with an appropriate planting scheme. Except for fencing and inspection chamber covers, there are no hard features above ground. An amendment to the planning consent will be needed to administer the new reduced impact design for the attenuation pond.

4. To what extent does phase 1 and phase 2 fall within the area of the SNCI?

Both Phase 1 and Phase 2 are located within the SNCI. The new drainage infrastructure including the attenuation pond is also within the SNCI. The upper cemetery expansion area, Area 1a and

1b is outside the SNCI, however this is serviced by the drainage infrastructure within the SNCI. Please see image below.



SNCI-BC19 – Phase One

Green shading shows the SNCI boundary

Red line shows the LEMP boundary of BNG enhancement within the SNCI

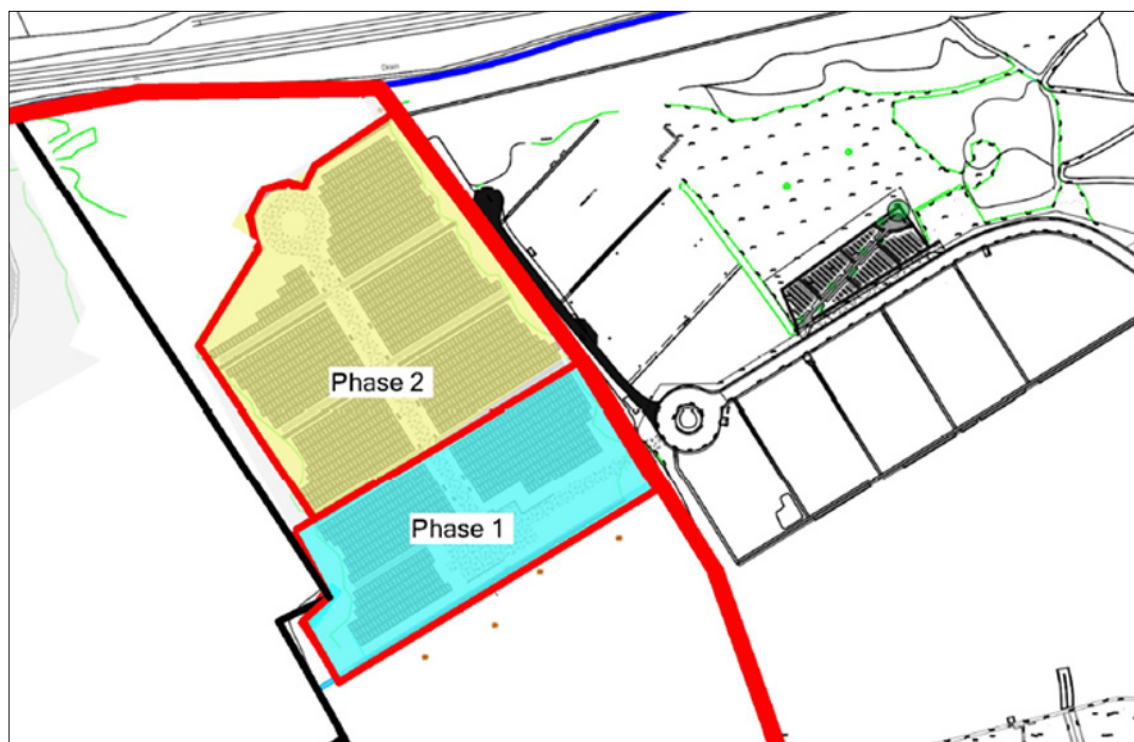
Blue line indicates the position of the Phase 1 Cemetery Expansion and reduced size attenuation pond

The scheme provides a significant scope of planting to restore grassland and enhance the SNCI

Explanation of Phase 1 and Phase 2

Phase 1 and Phase 2 only apply to Area 3. The drawing extract below shows how Area 3 is divided into Phase 1 and Phase 2.

Phasing Plan for Area 3



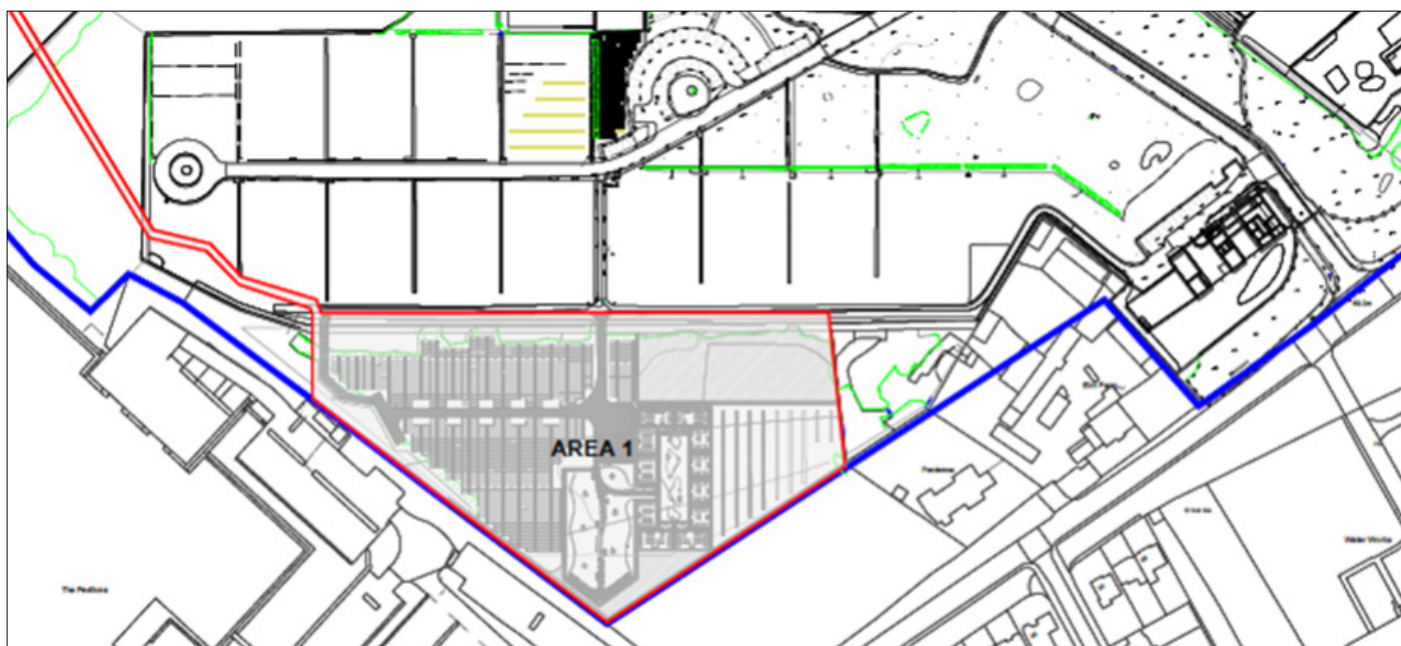
Explanation of Areas 1a and 1b

Area 1A and 1B are more generally just known as Area 1, this is the triangle of land on higher ground to the south of the Cemetery. Area 1 is BCC owned, outside the SNCI and outside the current cemetery boundary. Area 1 was part of the recent consented planning application. The distinction between Area 1A and Area 1B is the depth of soil.

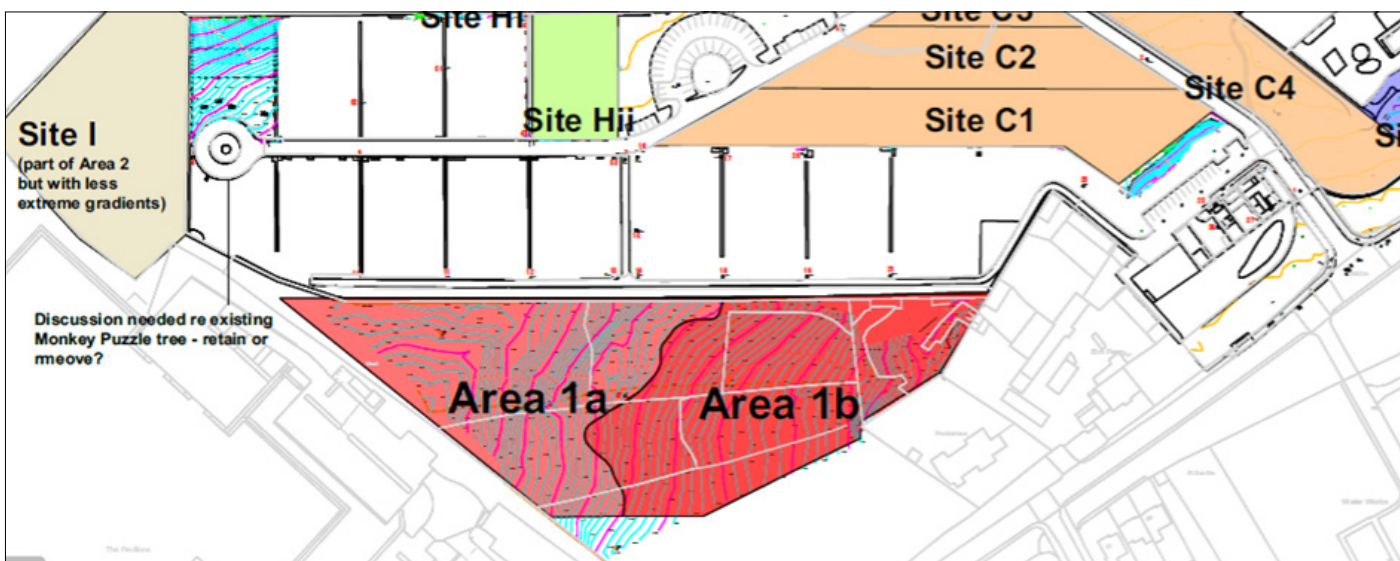
The soil in Area 1B being too shallow for standard burials, so the cemetery design for Area 1B features ash interment and baby burials, which need less depth of soil than full depth burials. There are some areas of the cemetery which appear suitable for burials but either the gradients are too steep for burials and/or the soil is too shallow for burials.

See two drawing extracts below:

Area 1 General location and layout



Area 1a and 1b Topo / Soil Mapping



Documents available in other formats:

You can request alternative formats of this document by contacting:
cems.crems@bristol.gov.uk