

Dear Sir/Madam

SMD/2024/0401

Construction / provision of 333No proposed cremation burial plots and proposed 'Garden of Remembrance' area including a 2.1m high brick wall, metal gazebo, paving and seating.

Cemetery, Congleton Road, Biddulph, Staffordshire, ST8 7RG

0.102 ha

Staffordshire Wildlife Trust has been asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

An application (Full MINOR) is being sought for the construction of a Garden of Remembrance and cremation burial plots with associated landscaping and other works. The site is located within the Staffordshire Moorlands Green Belt.

We have viewed the following documents:

- Site location plan (CTD Architects, dated 01/08/24)
- Site layout plan Phase 1 (CTD Architects, dated 16/08/24)
- Site layout plan Phases 2 and 3 (CTD Architects, dated 03/09/24)
- Biodiversity Net Gain Small Sites Metric (dated 04/09/24)
- Design and Access Statement (CTD Architects, dated Sept. 24)

SUMMARY – Having reviewed the information provided we have a **holding objection** to the proposed scheme.

The further information requested as:

1. A baseline habitat plan is provided as part of the application to support the Biodiversity Net Gain baseline assessment.
2. Clarification on some aspects of the BNG Metric provided.

SITE CONTEXT

There are no designated site of nature conservation interest within 500m of the site, and while the site is within an Impact Risk Zone (IRZ¹) in terms of designated sites, the proposals do not meet any of the risk criteria flagged up for this location.

Two Priority habitats, Deciduous Woodland and Wood Pasture & Parkland, are mapped within 500m of the site to the north/north-east, associated with Spring Wood and Biddulph Grange Country Park. The proposals are not considered to negatively impact on these Priority habitats, however.

HABITATS AND SPECIES

¹ The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make an initial assessment of the likely risk of impacts on SSSIs posed by developments. See <https://magic.defra.gov.uk/MagicMap.aspx>

The site is part of the existing cemetery at Congleton Road, Bidulph. It supports highly managed short mown grassland, ornamental planting and paths. No priority habitats are recorded as present and there is a short stretch of common box (*Buxus sempervirens*) hedge. The site is unlikely to be used by protected species due to the highly managed nature of the habitats, which provide no significant areas of shelter or protection. There are no trees on site and the mature trees adjacent to the site appear to remain unaffected by the scheme with a small standoff included to protect the rooting zones.

The inclusion of new native tree planting and new native hedge within the landscape proposals is welcomed.

BIODIVERSITY NET GAIN

The Biodiversity Net Gain Small Sites Metric (SSM) submitted, however the lack of a baseline habitat plan makes assessing the detail of the Metric difficult to review. We therefore request a baseline habitat plan is provided showing the location and area (m²) of each baseline habitat included in the SSM.

The reason for the inclusion of overhanging trees as 'woodland' within the baseline is not clear and, associated with this, the proposed enhancement of woodland requires further explanation to show it is a suitable approach. Further clarification is therefore requested on how woodland and woodland enhancement is treated within the BNG assessment, with a clear justification for the approach taken.

The selection of 'habitat creation' should be more fully explained – it is not clear how the removal of small concrete slabs will result in woodland habitat creation, for example, or how the proposed tree planting fits into this assessment.

As a minor point – 'vegetated garden' is typically used for private gardens and the applicant should consider if this is the correct classification for the ornamental beds currently on site. Similarly, bare ground may be better included within the ornamental beds as this appears to be part of the usual management of these beds (rather than a separate habitat in of itself).

Regards,

Dated 04 October 2024