
Biodiversity Net Gain (Statutory Metric) Design Stage Report

PROPOSED NEW CEMETERY
Manor Road, Brandon, Suffolk

April 2025



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Contents Amendment Record

REPORT NUMBER: BRANDONCEMETERY/2025/BNG/001

This report has been issued and amended as follows:

| Issue | Revision | Description | Date | Signed |
|-------|----------|--------------|------------|------------|
| 1 | 0 | Draft | 18/02/2025 | H. Evans |
| 1 | 1 | Final draft | 20/03/2025 | A. Gregory |
| 1 | 2 | Issued draft | 02/04/2025 | C. Whiting |

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NON-TECHNICAL SUMMARY

MHE Consulting Ltd were instructed to complete a Biodiversity Net Gain (BNG) Assessment in support of the creation of a proposed new cemetery, on land to the north of Manor Road, Brandon, Suffolk. The landscaping proposals include mixed native boundary hedgerow planting as well as the enhancement of grassland in the north of the field.

The application site (0.35ha) currently forms part of an existing field of unmanaged rough grassland (other neutral grassland) located to the north of Manor Road, Brandon. Other habitats present on site include areas of bare ground and stands of tall forbs and some short mown modified grassland. The site is currently used by dog walkers and various footpaths comprising of bare earth cut through the site and wider field, one of which is a Public Right of Way (PRoW).

When these habitat types and conditions were input into the Statutory Biodiversity Metric, this returned a baseline habitat value of **2.43 area habitat units**, of which **0.42 area habitat units** will be retained and **0.04 area habitat units** will be enhanced. No hedgerows or watercourses are present within the application site boundary.

The proposed on-site habitat creation includes the new burial plots, ashes internment strips, new parking area, site access and driveway, and some new grassed areas (to replace tall forbs and bare ground). Areas of retained grassland in the north and western parts of the site will also be enhanced from 'Moderate' to 'Good' condition.

When the on-site habitat creation, retention and enhancement scores are combined, the proposed scheme will give a total on-site post-intervention value of **1.59 area habitat units** and result in an overall negative on-site net change of **0.84 area habitat units** from baseline. This is equivalent to an on-site net percentage change of **-34.56%**. The automated trading rules built into the Statutory Metric were also not met due to the uncompensated loss of a habitat of medium distinctiveness (other neutral grassland).

Some off-site habitat enhancement interventions were therefore required to ensure the project will deliver a $\geq 10\%$ BNG and to satisfy the trading rules. The off-site habitat enhancement area is proposed within the wider site, at the northern end of the field. This area supports other neutral grassland of a similar type and quality as the on-site grassland habitat; the baseline condition of this habitat has been assessed as Moderate. This returned an off-site baseline score of **3.20 area habitat units** over a total area of 0.40ha. This area is proposed to be enhanced/managed to become more floristically rich whilst supporting a more heterogeneous sward height, which will result in an improvement in condition score to Good within the relevant timeframe. This proposed off-site habitat enhancement will deliver **4.32 area habitat units**

When the on-site and off-site post-intervention values are combined, the proposed scheme will result in a positive overall net unit change of **0.28 habitat units** or a **11.55% BNG**, the trading rules are also satisfied.

Proposed hedgerow planting around the site boundaries includes lengths of both native and ornamental hedging. This will deliver significant biodiversity gains for linear hedgerow habitats, subject to the successful establishment and appropriate management of these habitats. However, a BNG assessment was not required for hedgerows as there are no baseline hedgerow habitats present within the red line boundary.

In conclusion, it is considered that the proposed scheme will deliver significant biodiversity gains for the site, subject to securing a BNG HMMP to ensure the successful establishment and management of all semi-natural post construction habitats.

1. INTRODUCTION

1.1 Project description

An application is to be submitted to West Suffolk Council to erect a new cemetery containing two blocks of burial plots, ash internment strips, a new vehicular access and a parking area, within an existing field of grassland on land to the north of Manor Road, Brandon, Suffolk IP27 0JG (TL 77559 86162; Figure 1).

1.2 Purpose of the report

This report has been prepared by MHE Consulting Ltd on behalf of Brandon Town Council. It presents the findings of a Biodiversity Net Gain (BNG) assessment undertaken in support of the planning application. This report should be read in conjunction with the ecology report submitted with the application¹.

1.3 Site Description

The application site (Figures 1 and 2) forms part of an existing field of unmanaged rough grassland (other neutral grassland) located to the north of Manor Road, Brandon. Other habitats present on site include areas of bare ground and stands of tall forbs and some short mown modified grassland.

The area is currently used by dog walkers and various footpaths comprising of bare earth cut through the site, one of which is a Public Right of Way (PRoW).

1.4 Planning status of project, certainty of design and assumptions made

A Full Planning Application will be submitted to West Suffolk Council. The assumed design of the scheme was determined from a draft Layout Proposal and Landscaping drawing produced by Land & Sculpture Design Partnership (LSDP) (drawing no. LSPD 1948.01 Rev F).

As the application has not yet been submitted to the LPA, and the assumed design determined from a draft layout plan it is therefore possible that there may be subsequent amendments/changes to the design of the scheme, which could have an impact on the outcome of the BNG assessment. If this was to occur, then a new or updated BNG assessment would need to be completed, to reflect any significant design changes.

1.5 Aims/objectives/Scope of Study

The aims and objectives of this report are as follows:

- Assess baseline data to classify the type, distinctiveness, condition, connectivity and strategic significance of habitats present at pre- and post-construction phases.
- Generate a BNG design with the aim of obtaining a minimum of 10% BNG through habitat creation.
- Consider off-site habitat creation and/or enhancement as an alternative option when BNG cannot be achieved on-site.

1.6 Relevant Policy & Legislation

A comprehensive description of key legislation and policies relevant to assessing the biodiversity impacts of development upon habitats and species is provided in the accompanying Ecology Report¹.

Most planning applications in England (with a few exemptions) are now formally required to deliver at least 10% BNG under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). BNG assessments were required for major application sites from 12 February 2024 and more recently for 'small sites' from 2 April 2024.

¹ MHE Consulting Ltd (2025). Ecology Report, PROPOSED NEW CEMETERY land to the north of Manor Road, Brandon, Suffolk - February 2025.

At a local level, documents relevant to biodiversity within the West Suffolk Council Local Planning Authority (LPA) area include the emerging Local Plan², which will provide a framework for shaping and guiding future development in the district until the year 2037. The West Suffolk Local Plan (consisting of the former Forest Heath area (FHDC) and former St Edmundsbury area (SEBC) Local Plan documents) sets out the long-term planning and land use policies within West Suffolk until the emerging plan is formally adopted. The West Suffolk Local Plan is made up of the Local Plan documents for the two former areas.

Policies protecting biodiversity and encouraging biodiversity enhancement are included in both Core Strategies including: FHDC CS2 - Natural Environment, SEBC CS2 - Sustainable Development, and in the Joint Development Management Planning Document (JDMPD) Policy DM11 Mitigation, Enhancement, Management and Monitoring of Biodiversity.

Policy JDMPD - DM11 requires the implementation of the mitigation hierarchy to avoid, mitigate and compensate for any losses due to new development.

As of February 2025, West Suffolk Council is in the process of finalising a new Local Plan, which includes specific policies on Biodiversity Net Gain (BNG). The Submission Draft (Regulation 19) of the West Suffolk Local Plan, published in 2024, outlines Policy SP6, mandating that qualifying development proposals achieve a minimum of 10% BNG.

Where appropriate, the LPA will use planning obligations and/or planning conditions to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum.

2. METHODOLOGY

2.1 Desk study and field survey

The baseline habitat data used in this assessment is sourced from the associated Ecology Report¹, which provides details regarding survey methodologies, surveyors, and survey constraints. A summary of the field survey is displayed in Table 1, below.

Table 1 Surveys undertaken to assess the baseline ecological value of the site

| Ecological survey | Methodology | Date(s) undertaken | Surveyor(s) | Constraints |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Baseline habitat survey & condition assessments | Habitat surveys applied the UKHab Classification Version 2.1 (UKHAB Ltd., 2023) with condition assessments as per Technical Annex 1 of the Statutory BNG Metric ³ . | 05 July 2022 05 December 2024 | MHE Consulting Ltd | Botanical assessments are ideally best carried out between April and October. However, given the nature of the site, its management, and the surveys carried out, the timing of the survey visits were considered appropriate for this report. |

2.2 Biodiversity Metric Assessment

The Statutory Natural England Biodiversity Metric tool was used in order to assess the baseline biodiversity value of the site and to calculate potential biodiversity changes resulting from the proposed river and floodplain

² https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/west-suffolk-local-plan-former-forest-heath-and-st-edmundsbury-areas.cfm
https://www.westsuffolk.gov.uk/planning/planning_policies/local_plans/

³ DEFRA – The Statutory Biodiversity Metric -Technical Annex 1: Condition Assessment Sheets and Methodology - First published November 2023

restoration works. It follows the methodologies set out in the Statutory Biodiversity Metric User Guide ⁴ and Technical Annex 1³ and has been produced with reference to the relevant CIEEM guidelines⁵.

The metric considers the size of a habitat and accounts for the three core quality components which contribute towards the calculation of biodiversity units, these are:

- **Distinctiveness:** is a measure based on the type of habitat and its distinguishing features, ranging from very low to very high;
- **Condition:** is a measure of the state of a habitat and is used to measure variation between parcels of the same habitat type, ranging from N/a-other to very good; and
- **Strategic significance:** is the local significance of the habitat based on its location and habitat type, ranging from low to high.

2.3 Assessors

This Biodiversity Metric Assessment was completed by Hannah Evans MSci (Hons) and Alex Gregory BSc (Hons) ACIEEM. Both have attended relevant CIEEM accredited biodiversity net gain (BNG) assessment training courses and have undertaken other BNG assessments for several development projects across East Anglia.

Hannah has over three years' experience undertaking Ecological Impact Assessments (EclA's) and reports for housing, commercial developments, estate management and civil engineering schemes as well as undertaking on-site survey, mitigation and monitoring for water vole and reptile (including capture and relocation). She regularly uses the Statutory Biodiversity Metric to inform design and ecological assessments.

Alex has over three years' experience conducting habitat and Ecological Impact Assessments (EclA's), as well as undertaking surveys for amphibians, bats, reptiles, badger (*Meles meles*), and water vole (*Arvicola amphibius*).

2.4 Assumptions and limitations

2.4.1 Habitats

The location, design (e.g. habitats) and size of the site have been determined from drawings provided by Land & Sculpture Design Partnership including a Layout Proposal and Landscaping (Drawing no. LSDP 1948.01 – Rev F). These drawings were imported into the current long-term release version of QGIS (QGIS 3.34.5 'Prizren') and then georeferenced to overlay on top of the most recent Google and or Bing Satellite imagery available.

2.4.2 Distinctiveness

The Statutory Biodiversity Metric has inbuilt attributes to reflect the distinctiveness of, as well as difficulty and length of time required to establish various semi-natural habitats, including woodland and various grassland types. Increases in distinctiveness (e.g., for rarer habitats), positively influence scores within the metric. When considering the establishment of post-construction habitats, multipliers are applied in relation to difficulty in establishing habitats and the time taken to reach condition target (with lower multipliers for more difficult or longer to achieve habitats).

Generally, the more 'pristine', threatened and/or often geographically restricted the habitat, the higher its distinctiveness, and the greater the difficulty of and time required to establish the habitat. For baseline habitats of 'High distinctiveness' a like for like replacement is required or else trading rules are not met, despite the potential for an overall increase in habitat units created. For habitats of 'Medium distinctiveness' there is only a requirement for the same broad habitat type to be created (e.g. any other grassland or woodland type of medium distinctiveness). In this instance, no baseline habitats (on-site or off-site) met the criteria to be classed as habitats of High distinctiveness and the trading rules were satisfied.

⁴ DEFRA – The Statutory Biodiversity Metric User Guide – last updated July 2024

⁵ CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK.

For some grassland habitats, there are multiple habitat options within the Metric to reflect the differences between historical high-quality semi-natural habitats (i.e., priority habitats⁶ under the Natural Environment and Rural Communities (NERC) Act 2006), and newly created habitats targeting similar end communities in the longer term. For the purposes of this assessment the proposed on and off-site grassland areas to be enhanced, to help deliver a >10% BNG, have been assigned as 'Grassland – other neutral grassland', which is a habitat of medium distinctiveness. It is assumed that these habitat areas could be managed to achieve a 'Good' target condition.

2.4.3 Condition

Any assumptions related to the condition assessments for baseline and post development habitats are documented in the relevant sections e.g., Tables 2 to 7. Post-development condition scores are dependent on the appropriate aftercare, management, and maintenance of the newly 'created/enhanced' (post-development) habitats. In general, the management of created habitats is important within the BNG metric because the metric accounts for some of the difficulty and risk associated with establishing and managing such habitats to achieve a target condition (e.g. Moderate or Good).

To be consistent with other elements of ecological assessment, the precautionary principle has been employed in relation to condition assessments.

2.4.4 Strategic significance

The 'strategic significance' of all existing and created habitats was set as low (as per table 7 in The Statutory Biodiversity Metric User Guide) as there are currently no published Local Nature Recovery Strategy (LNRS) Maps showing areas of high-medium strategic significance in Suffolk (including within West Suffolk).

3. BASELINE CONDITIONS

3.1.1 Current land use

The site is currently largely used by dog walkers and various footpaths comprising of bare earth cut through the site.

3.1.2 On-site habitat baseline

Most of the site currently comprises tussocky grassland (0.269ha), the majority of which is relatively species poor and consists of species typical of other neutral grassland (**g3c - other neutral grassland; 128 tall or tussocky sward**). An area near the southern boundary has been cleared, in the location of the proposed new access, and currently comprises a strip of species poor grass (**g4 - modified grassland; 108 frequently mown**) (0.014ha).

Several tracks/paths have been made through the site (e.g. by dog walkers). These are largely compacted bare ground (**u1, 510 - bare ground**) (totalling 0.031ha). The site also contains some stands of tall forbs along the southern boundary (**s1, 16; tall forbs**) (0.037ha) with a small area of scrub (**h3d - bramble scrub**) in the southwestern corner of the plot (c. 0.003ha).

All the existing habitats have been assessed as being in a 'Moderate' baseline condition, except for the bare ground which is in a 'Poor' condition and the scrub which does not require a baseline condition assessment.

When these habitat types and conditions were input into the Statutory Biodiversity Metric, this returned a baseline habitat value of **2.43 area habitat units**, of which **0.42 area habitat units** will be retained and **0.04 area habitat units** will be enhanced. No hedgerows or watercourses are present within the works area.

⁶ Listed under S. 41 of the NERC Act 2006 as 'habitats and species which are of principal importance for the conservation of biodiversity in England'.

Table 2 On-site area habitat classification, condition assessment and area entered into the Statutory Biodiversity Metric for the baseline assessment.

| On-site habitat | BNG/UKHAB Classification | Parcel Ref | Area (ha) | Condition | Distinctiveness | Total habitat units | Comments |
|-------------------------|------------------------------------|------------|-------------|----------------------------|-----------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Grassland | Other neutral grassland (g3c, 128) | H1 | 0.269 | Moderate | Medium | 2.15 | The majority of the site comprises moderate condition other neutral grassland, most of which will be retained, some around the margins will be enhanced in the north of the site to good condition, some will be retained in the south of the site in a moderate condition and some will be lost where plots and access are to be constructed in the centre of the plot. |
| Grassland | Modified grassland (g4, 106) | H2 | 0.014 | Moderate | Low | 0.06 | A strip of closely mown modified grassland in the location of the proposed new access, off the middle of the southern boundary, adjacent to Manor Road. The baseline condition is assessed as moderate as the uniform sward is species poor (6-8 plants per m ²) and the parcel passes 5 criteria including essential criterion A, failing D for levels of physical damage creating more than 5% of bare ground. |
| Sparsely vegetated land | Tall forbs (s1, 16) | H3 | 0.037 | Moderate | Low | 0.15 | Stands of tall forbs along the southern boundary of the site, dominated by common nettle. Passes 2 of 3 criteria so is in a moderate condition. |
| Urban | Bare ground (u1, 510) | H4 | 0.031 | Poor | Low | 0.06 | Paths have been made through the site to create walking routes, vegetation was absent at time of survey due to foot traffic and dog walking, numerous mole hills are also present. Passes 1 of 3 criteria so is in a Poor condition. |
| Heathland and shrub | Bramble scrub (h3d, 10) | H5 | 0.003 | N/A | Medium | 0.01 | An area of bramble scrub is present in the southwestern corner of the plot, surrounding an area of saplings and adjacent to roadside trees and wall. |
| Total area (ha) | | | 0.35 | Total habitat units | | 2.43 | |

Table 3 Summary of baseline area of habitats to be retained and enhanced on-site.

| On-site habitat | BNG/UKHAB Classification | Parcel Ref | Area retained or enhanced (ha) | Baseline units retained or enhanced | Comments |
|-----------------|-------------------------------|------------|--------------------------------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Grassland | Other neutral grassland (g3c) | H1 (H1R) | 0.051 | 0.41 | Retained areas of grassland in the south of the site and between the blocks of burial plots will be managed to remain in a Moderate condition, as existing. |
| Grassland | Other neutral grassland (g3c) | H1 (H1E) | 0.05 | 0.40 (to 0.54) | Areas of retained grassland adjacent to the northern and northern end of the eastern and western boundaries, surrounding the proposed new burial plots, will be enhanced through re/overseeding with a native wildflower mix and managed with later and earlier cuts to create a more species rich sward and achieve a Good target condition. |

| | | | | | |
|-----------------------------------------------|---------------------|----------|-------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Heathland and shrub | Bramble scrub (h3d) | H5 (H5R) | 0.003 | 0.01 | An area of scrub in the southwestern corner of the existing plot will be retained in its baseline condition and will be adjacent to two new proposed boundary hedgerows. |
| Total area/units retained and enhanced | | | 0.01 | 0.82 | |

3.1.3 Off-site habitat baseline

The total off-site baseline habitat areas entered into the Statutory Metric are documented in Table 4 below (Figure 3). This habitat parcel (OFS1) comprises of 0.40ha of (**g3c - other neutral grassland, 128 tall or tussocky sward**) within the applicant's land holding, located c. 75m north of the application site. The area contains grassland of a similar type and quality as the on-site plot with little variation between the northern and southern ends, though it appears less frequently used than the application site and the northern edge of the parcel is abutted by a line of trees. The plot supports a relatively species rich, tussocky sward (<8 plants per m²) but fails to meet essential criteria for achieving 'Good' condition, (again, some areas of bare ground exist where used as a footpath). The baseline condition of this habitat has been assessed as 'Moderate'. This returned an off-site baseline score of **3.20 habitat units**.

It is proposed that the existing grassland will be enhanced, through condition improvement, to achieve a Good target score.

Table 4 Off-site area habitat classification, condition assessment and area entered into the Statutory Biodiversity Metric for the baseline assessment.

| Off-site habitat | BNG/UKHAB Classification | Area (ha) | Condition | Distinctiveness | Total habitat units | Comments |
|------------------------|-------------------------------|-------------|----------------------------|-----------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| Grassland (OFS1) | Other neutral grassland (g3c) | 0.40 | Moderate | Medium | 3.20 | Area of grassland to the north of the site, featuring a sward which fails to meet essential criteria for achieving good condition. Passes 4 criteria. |
| Total area (ha) | | 0.40 | Total habitat units | | 3.20 | |

3.2 Important ecological features

3.2.1 On-site

The site does not fall within the boundary of any statutory designated site (e.g. SSSI, SPA, SAC etc.) and is considered to contain habitats of low to moderate ecological value. The habitats present will offer foraging opportunities for various species, with refuge opportunities limited to the area of scrub.

3.2.2 Off-site

The off-site habitat parcel does not fall within the boundary of a statutory designated site and none of the habitats meet the criteria to be classified as a S. 41 habitat of principle importance. The parcel was selected due to its proximity to the site, its tree lined boundary and potential to enhance connectivity and extent of valuable habitats within the wider site.

The total habitat baseline was assessed as:

- Total habitat units = 2.43
- Total habitat units retained = 0.42
- Total habitat units enhanced = 0.40 (to 0.54)
- Total habitat units lost = **1.61**
- Total off-site habitat units = 3.20
- Total off-site habitat units to be lost = 0
- Total off-site habitat units to be enhanced = 3.20 (to deliver 4.32)

3.4 Baseline date

The Baseline date is as per the most recent site walkover on 5 December 2024. It is assumed that no significant changes in management practices have occurred on site since this date. The baseline survey result should therefore remain valid at the time of writing.

4. PROPOSED DESIGN

4.1 On-site post construction habitat creation

Tables 5 and 6 below document the results of proposed on-site post construction habitat creation and enhancement measures (Figure 4), which includes the new burial plots (HC3), ash internment strips (HC1), and parking area, site access and driveway (HC2), and new and enhanced areas of neutral grassland (H1R, H1C and H1E).

The burial plots are classed as habitats of medium distinctiveness (**u1; 90 - cemeteries and churchyards**) and are assumed to reach a moderate target condition score, delivering 0.40 area habitat units, as most of the land will be vegetated, with parts of site set aside for future burials sown with a native wildflower meadow mixture. If this habitat area was classified as either other neutral grassland in 'Poor' condition or modified grassland in 'Moderate' condition instead, then an additional 0.07 area habitat units for the former or 0.04 area habitat units for the latter would be delivered.

The internment strips (**u1c – artificial unvegetated, unsealed surface**) and parking area, site access and driveway (**u1b – developed land, sealed surface**) are considered habitats of very low distinctiveness, which do not generate any habitat units.

Areas of other neutral grassland (**g3c - other neutral grassland**) will also be created (HC4) to replace the existing nettle dominated vegetation along the southern boundary and adjacent to the access. Some additional grassland will be sown where bare ground currently exists. These habitat parcels are assumed to reach a 'Moderate' target condition (with sympathetic management), to match the retained grassland that already exists on site.

The proposed on-site habitat creation will deliver a total of **0.63 area habitat units**, with a small area of bramble scrub (**h3d – bramble scrub**) retained in the far southwest corner of the site (as required to satisfy the trading rules), allowing the retention of **0.42 area habitat units**.

Two areas of grassland (**g3c – other neutral grassland**) in the northern and western parts of the site will be overseeded with a species-rich native wildflower meadow mixture (e.g. Emorsgate EM3 Special General-Purpose Meadow Mixture), with the addition of yellow rattle (*Rhinanthus minor*), and managed with a two-cut system; the first cut should be delayed until yellow rattle plants have set seed (usually by July or August) followed by a second cut in autumn (September to early October). Any arisings will be collected and composted. With appropriate long-term management it is assumed that the grassland will be sufficiently enhanced to a 'Good' target condition. This intervention will generate an additional **0.54 area habitat units**.

The post on-site area habitat creation, retention and enhancement interventions will deliver a total of **1.59 area habitat units**, which results in an overall negative on-site net change of **-0.84 habitat units** from baseline, equivalent to an on-site net percentage change of **-34.56%**. The trading rules built into the Statutory Metric were also not met due to the uncompensated loss of a habitat of medium distinctiveness (other neutral grassland).

Some off-site habitat enhancement interventions are therefore required to ensure the project delivers a ≥10% BNG and to satisfy the trading rules.

Table 5. Habitat classifications, condition assessments and areas entered into the Statutory Biodiversity Metric for the post-construction on-site (area habitat creation) assessment

| On-site habitat | BNG/UKHAB Classification | Area (ha) | Condition | Distinctiveness | Total habitat units | Comments |
|------------------------|------------------------------------------------|-------------|----------------------------|-----------------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Urban (HC1) | artificial unvegetated, unsealed surface (u1c) | 0.005 | N/a | Very low | 0.00 | Strips of gravel laid for the internment of ashes |
| Urban (HC2) | Developed land; sealed surface (u1b) | 0.083 | N/a | Very low | 0.00 | Combined footprint of the surfaced access route and parking area |
| Urban (HC3) | Cemeteries and churchyards (90) | 0.126 | Moderate | Medium | 0.40 | New burial plots in two blocks to the east and west, head stones with grass strips between. This could potentially be good if there is variation in sward height as some strips around the plots have been included. This would need to be left uncut, and it is recommended that the whole area is seeded with the same wildflower mix as the rest of the site where other neutral grassland is proposed to be created. The area should be left uncut, especially in the summer months. Headstones can act as habitat for lichens, mosses, fungi and invertebrates. |
| Grassland (HC4) | Other neutral grassland (g3c) | 0.035 | Moderate | Medium | 0.23 | Grassland created along the southern boundary and adjacent to the access, replacing stands of tall forbs, (0.023ha) and reseeded of paths to replace currently existing bare ground (0.012ha). Signage should be installed to discourage trampling of area of new grassland creation and retained around the margins. |
| Total area (ha) | | 0.25 | Total habitat units | | 0.63 | |

Table 6. Habitat classifications, condition assessments and areas entered into the Statutory Biodiversity Metric for the post-construction on-site (area habitat enhancement) assessment

| On-site habitat | BNG/UKHAB Classification | Parcel Ref | Condition and distinctiveness | Area enhanced (ha) | Units delivered | Comments |
|-------------------------|-------------------------------|------------|--------------------------------|--------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Grassland | Other neutral grassland (g3c) | H1E | Moderate to Good Medium | 0.05 | 0.54 | This habitat parcel will be reseeded with a native wildflower mix and cultivated according to supplier guidance. and managed with a two-cut system; the first cut should be delayed until yellow rattle plants have set seed (usually by July or August) followed by a second cut in autumn (September to early October). With appropriate long-term management It is assumed that the grassland will be sufficiently enhanced to a 'Good' target condition and the area should be fenced to stop trampling and grazing, which should reduce levels of physical damage and increase the species richness of the sward. |
| Total area/units | | | | 0.05 | 0.54 | |

4.2 Off-site post construction habitat creation and enhancement

Table 7 displays the results of proposed off-site post construction habitat enhancement measures to be implemented to ensure that the proposed development project delivers a $\geq 10\%$ BNG and to satisfy the trading rules.

This will comprise the enhancement of 0.40ha of existing grassland (**g3c – other neutral grassland**), located c. 10m north of the red line boundary (OFS1E), within the same field. It will also be overseeded with a species-rich native wildflower meadow mixture, with the addition of yellow rattle, and managed with the same two-cut system as per the enhanced on-site parcels.

It is assumed that the grassland will be sufficiently enhanced to achieve a ‘Good’ condition score in the long-term (from a ‘Moderate’ baseline score) and once established will provide an increase in biodiversity value for a range of important species. The parcel is located immediately adjacent to an existing treeline which delineates the northern field boundary. The enhancement location will enable a greater level of habitat connectivity, offering some adjacent refuge and commuting habitat, increasing the extent of habitat with the potential to support numerous protected species.

This will deliver **4.32 area habitat units**, which, when combined with proposed on-site habitat interventions, represents a positive net unit change of **0.28 habitat units** or a **11.55% BNG**.

Table 7. Habitat classifications, condition assessment and area entered into the Statutory Biodiversity Metric for the post-construction off-site (area habitat enhancement) assessment

| Off-site habitat | BNG/UKHAB Classification | Parcel Ref | Area enhanced (ha) | Condition and distinctiveness change | Units enhanced | Units delivered | Comments |
|------------------|-------------------------------|------------|--------------------|--------------------------------------------------|----------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Grassland | Other neutral grassland (gc3) | OFS1 | 0.40 | Moderate to Good (Medium distinctiveness) | 3.20 | 4.32 | This habitat parcel will be reseeded with a native wildflower mix and cultivated according to supplier guidance. Management to include receiving one cut per year in the spring (March – April) followed by a late summer/autumn cut (August to early October). Any arisings should be collected and composted. The condition will be enhanced to Good and the area should be fenced to stop trampling and grazing, which should reduce levels of physical damage and increase the species richness of the sward. |
| Total | | | 0.40 | | 3.20 | 4.32 | |

5. BNG - GOOD PRACTICE PRINCIPLES FOR DEVELOPMENT

The following section of the report describes how the proposal complies with each of the BNG Good Practice Principles listed in published CIEEM guidance.

5.1 Principle 1. Apply the Mitigation Hierarchy

The mitigation hierarchy seeks as a preference to avoid impacts then to mitigate unavoidable impacts, and, as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and mitigation measures have been implemented.

The Ecology Report¹ submitted with this application describes further avoidance measures to limit ecological impacts in relation to habitats (e.g. limiting vegetation clearance to within the application site boundary, siting the contractor’s compound away from retained boundary habitats, using Heras fencing to prevent damage to retained habitats and implementing a contractor Risk Assessment Method Statement to avoid impacts on

protected species (e.g. timing of works to avoid nesting birds and good working practices to prevent impacts on hedgehogs reptiles and amphibians etc.). Additional compensatory/enhancement measures relating to protected species will also be provided.

5.2 Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere

Projects with impacts on irreplaceable habitats cannot achieve BNG. However, no 'irreplaceable' (very high distinctiveness under the Statutory Biodiversity Metric) habitats will be lost under the current proposal. All habitats on-site and off-site fall within the medium to low distinctiveness categories, such that any losses can be offset by creating compensatory habitats and/or enhancing existing habitats.

5.3 Principle 3. Be inclusive and equitable.

To comply with the BNG Good Practice Principles, a development project must demonstrate that it has sought the views and advice of relevant stakeholders (e.g. nature conservation bodies/NGOs, the local community and the LPA). For smaller projects, such as the current scheme, this will occur via planning process consultation.

5.4 Principle 4. Address risks

There are multiple risks associated with creating and enhancing habitats; these can include the biophysical characteristics of the site (e.g. soil type, structure, nutrient status and pH, hydrology, and existing vegetation type), the climate (current and future), topography, and prior, current, and future site management practices (e.g. interest, skill and commitment of the landowner and/or contractors).

In order to account for these risks, the BNG metric applies three 'risk multipliers' to all post-development habitat creation and enhancement options. These are: i). The difficulty of creation or enhancement; ii). temporal risk; and iii). The spatial risk. Each habitat is automatically assigned a score based on how difficult it is to create or enhance (technical risk) and the perceived time it will take to achieve the target condition (temporal risk). Finally, where BNG involves offsite action, a spatial risk multiplier is imposed based on the proximity to the intervention site.

Considering the above information, all post construction habitats have been selected based on existing habitats in the wider landscape/site (e.g. neutral grassland and selected native shrubs). The site (on-site and off-site parcels) is within an area classified as Soilscape¹⁰: freely draining, slightly acid, sandy soils, low fertility characteristic of dry acid pastures, acid deciduous and coniferous woodland, primarily arable landcover, cropping and heathland are the prominent topologies. Low topsoil carbon, draining to groundwater.

In committing to the BNG process, the applicant will ensure that the aftercare, management and maintenance required to successfully establish the created habitats (on-site and off-site) and achieve their target condition set by this metric assessment, for a minimum of 30-years post-construction. The applicant has agreed to install additional fencing around all of the on-site and off-site grassland enhancement plots to ensure that no animals can access the areas and degrade the habitat through grazing or trampling by humans/dog walkers. A BNG Habitat Management and Monitoring Plan (HMMP) will be produced to ensure that all BNG is delivered to the required condition. This should include the following details:

- Aftercare maintenance and long-term habitat management and monitoring of created and enhanced features.
- How management will be implemented for a minimum period of 30 years.
- What monitoring will be implemented during and after construction.

5.5 Principle 5. Make a measurable Net Gain

The key principle driving BNG is to ensure that developments achieve quantifiable gains in biodiversity, at the levels set by both national and local policy and legislation (e.g. minimum of 10%). In this instance the metric calculation shows that there will be a **net increase of 0.28 habitat units** or an overall net percentage change **of 11.55%**, ensuring compliance with Principle 5.

5.6 *Principle 6. Achieve the best outcomes for biodiversity*

There are no Local Nature Recovery Strategies covering the application site. However, in time these will be provided to aid the BNG process. The BNG proposals for the development project will result in the delivery of a BNG of habitats (e.g. other neutral grassland) which will deliver an enhancement over the existing wider site, with benefits for a range of protected and notable species including nesting birds.

Some native and ornamental hedgerow and tree planting is also proposed around the site boundaries. These will also deliver biodiversity gains once they have established. However, as no linear hedgerow habitats are present on site at baseline there is no requirement to calculate the BNG value of these habitat features.

5.7 *Principle 7. Be additional*

Development projects should achieve biodiversity outcomes that go beyond existing obligations (i.e., do not deliver something that would occur anyway). In this instance there will be an additional **BNG of 1.55%** above the minimum 10% threshold required.

5.8 *Principle 8. Create a Net Gain legacy*

The applicant owns all land within the site boundary and where off-site habitat creation and enhancements will occur, which reduces the complexity with management of newly created and enhanced habitats and provides a higher level of accountability to ensure that all habitats achieve their target condition.

5.9 *Principle 9. Optimise sustainability*

The proposed development site has previously been allocated to increase the capacity of burial space within Brandon as the existing cemetery is at capacity. Significant areas of semi-natural habitat will be retained on-site.

5.10 *Principle 10. Be transparent*

The findings of this BNG assessment and other related/subsequent documents will be made public as part of the planning application submitted to West Suffolk Council, ensuring that the project demonstrates compliance with Principle 10.

6. PROJECT IMPLEMENTATION

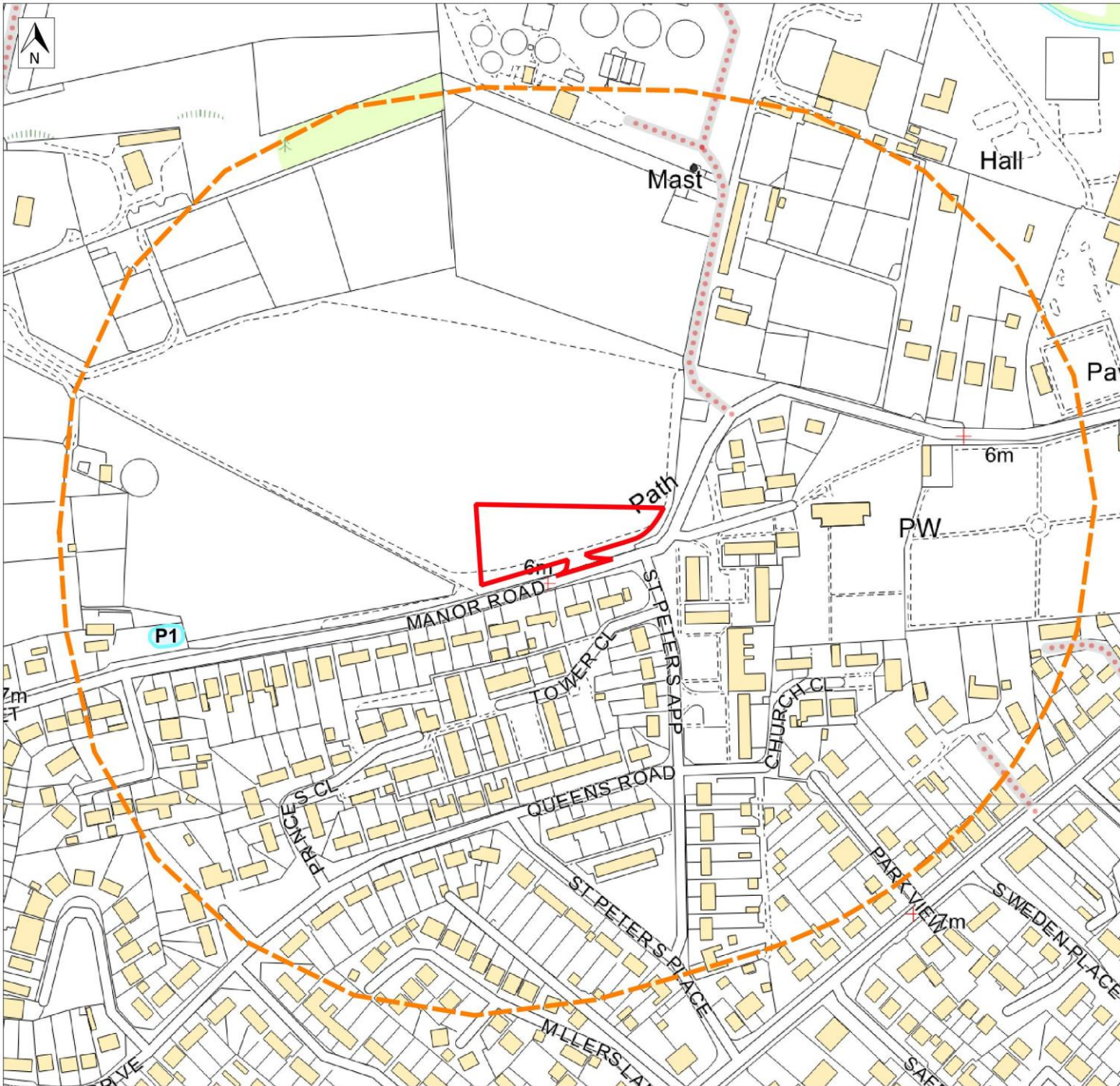
The Location and Block Plans (drawing nos. BB_001; EF_001 and KE_001) and Proposed Ground Floor and First Floor Plans drawings will be used to inform work delivery on the ground. Any Construction Management Plan produced for the works should also be followed.

7. CONCLUSION

The design of the proposed scheme is considered consistent with the principles of BNG, with losses of biodiversity during construction offset through both on-site and off-site habitat creation and enhancement. The allocation of habitats and their predicted condition, as well as the design of the Statutory Biodiversity Metric itself, addresses risks in terms of achievable outcomes. As currently scoped the scheme delivers a significant measurable net gain in area of biodiversity value, above typical target levels (e.g., >10%) and is consistent with local and national planning policies.

In conclusion, it is considered that the proposed scheme will deliver significant biodiversity gains for the site, subject to securing a BNG HMMP to ensure the successful establishment and management of all semi-natural post construction habitats.

Figures



Legend

- Application site boundary
- 250m buffer
- Ponds



Client: Brandon Town Council

Project: Brandon Cemetery, Suffolk

| | | |
|--------|----------|-------------------------|
| Drawn: | Date: | Drawing Ref: |
| HE | 18/02/25 | BRANDONCEMETERY/ER25/01 |

Figure 1 Site location and ponds plan



Legend

- Application site boundary

- Existing habitats within the works area
- (H1) g3c - other neutral grassland; 128 tall or tussocky
- (H2) g4 - modified grassland; 106 mown
- (H5) h3d - bramble scrub
- (H4) u - urban; 510 bare ground
- (H3) s - sparsely vegetated land; 16 tall forbs



Client: Brandon Town Council

Project: Brandon Cemetery, Brandon, Suffolk

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| HE | 18/02/25 | BRANDONCEMETERY/BNG25/2 |

Figure 2 Baseline on-site habitats plan



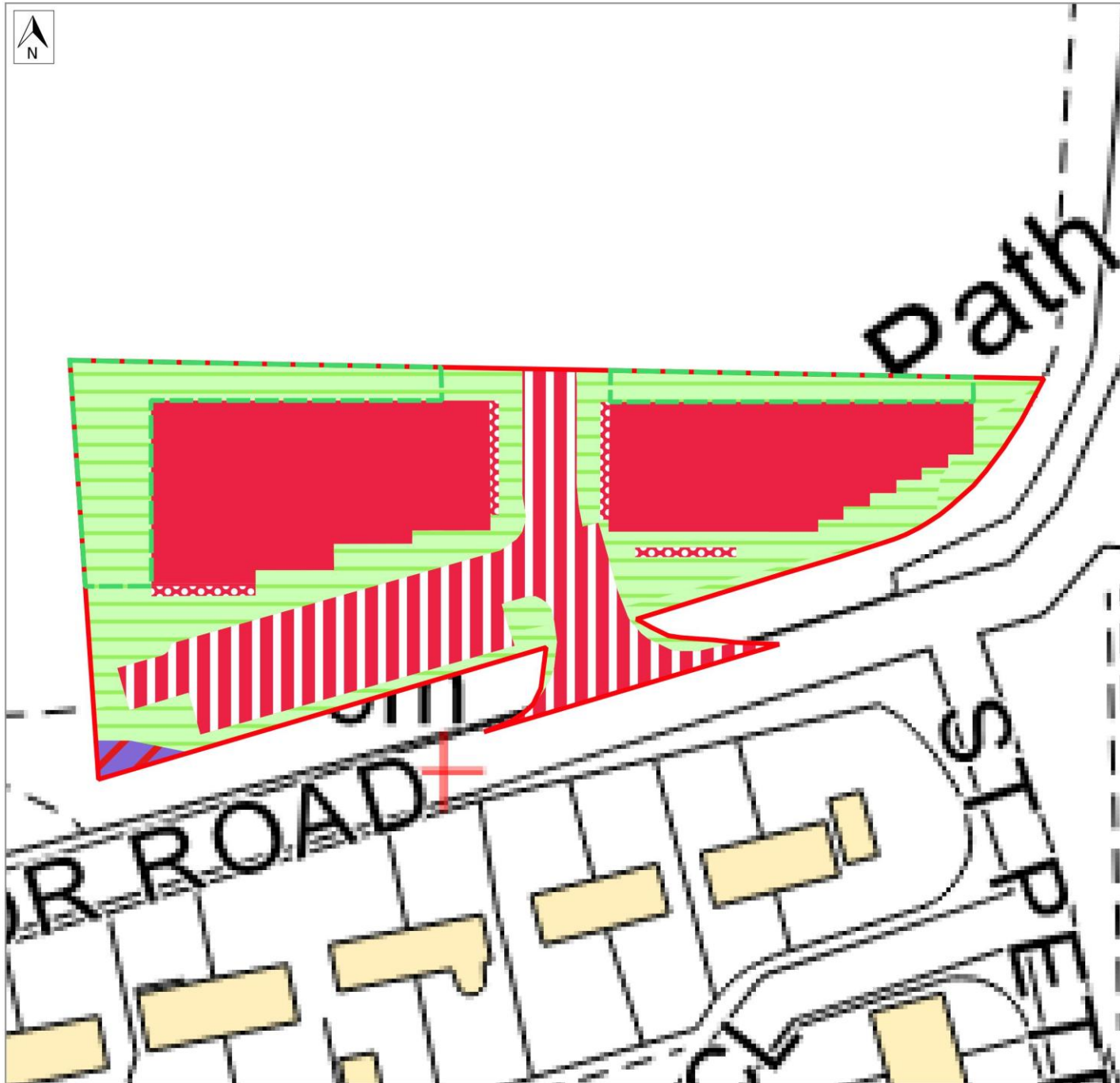
Legend

- Application site boundary
- Offsite enhancement area (0.4ha)
- (OFS1) g3c - other neutral grassland - Moderate condition










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| Client: Brandon Town Council | | |
| Project: Brandon Cemetery, Brandon, Suffolk | | |
| Drawn: | Date: | Drawing Ref: |
| HE | 18/02/25 | BRANDONCEMETERY/BNG25/3 |

Figure 3 Baseline off-site habitats plan



Legend

-  Application site boundary
-  (H1E) g3c - other neutral grassland - Good
-  (H1R) g3c - other neutral grassland - Moderate
-  (H5R) h3d - bramble scrub
-  (HC3) 90 Cemeteries and churchyards - Moderate
-  (HC2) u1b - developed land, sealed surface
-  (HC1) u1c - artificial unvegetated, unsealed surface

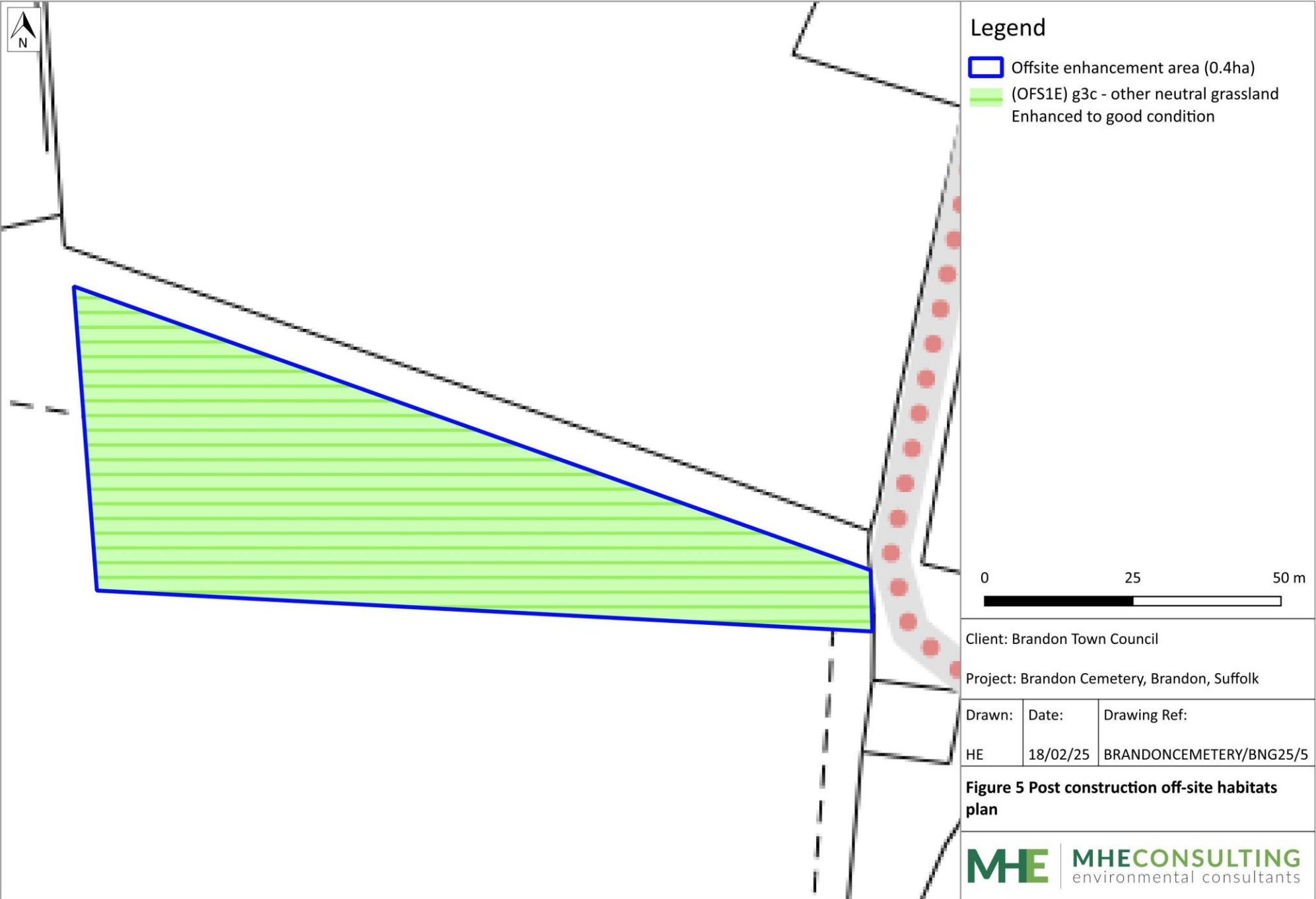
Notes

Proposed hedgerow planting around the site boundaries includes lengths of both native and ornamental hedging - see draft Layout Proposal and Landscaping drawing produced by LSDP (drawing no. LSPD 1948.01 Rev F). This will deliver significant biodiversity gains for linear hedgerow habitats, subject to the successful establishment and appropriate management of these habitats. However, a quantitative BNG assessment was not required for hedgerows as there are no baseline hedgerow habitats present within the red line boundary.





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| Client: Brandon Town Council | | |
| Project: Brandon Cemetery, Brandon, Suffolk | | |
| Drawn: | Date: | Drawing Ref: |
| HE | 18/02/25 | BRANDONCEMETERY/BNG25/4 |

Figure 4 Post construction on-site habitats plan



Legend

-  Offsite enhancement area (0.4ha)
-  (OFS1E) g3c - other neutral grassland
Enhanced to good condition



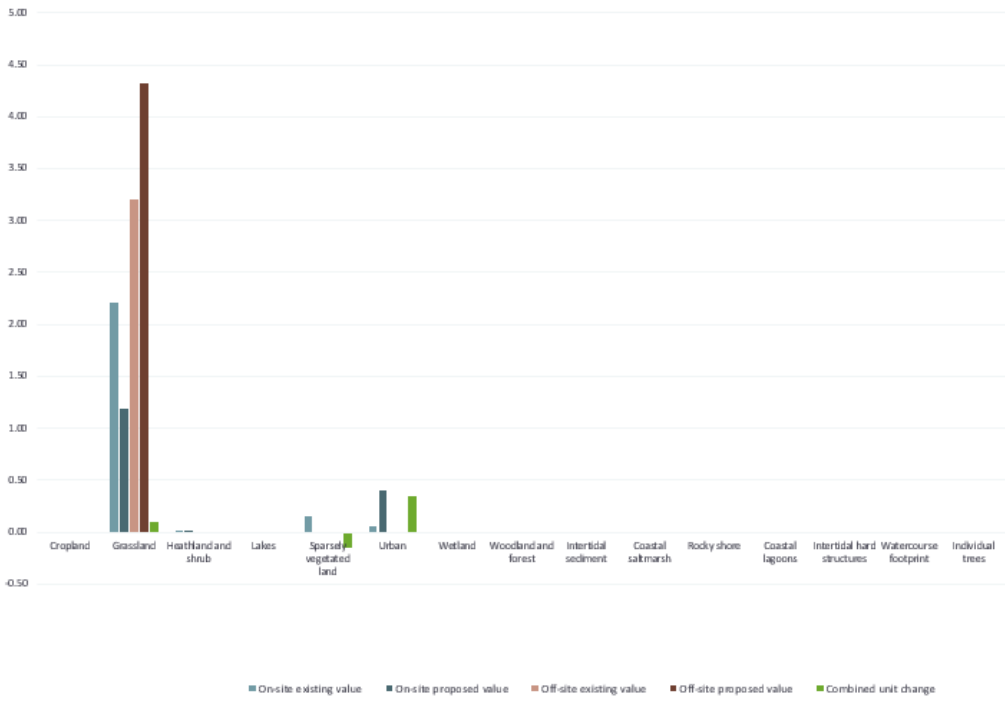
Client: Brandon Town Council
Project: Brandon Cemetery, Brandon, Suffolk

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| Drawn: | Date: | Drawing Ref: |
| HE | 18/02/25 | BRANDONCEMETERY/BNG25/5 |

Figure 5 Post construction off-site habitats plan

Appendix A1 Habitat change graphs

Biodiversity unit change by habitat group



Area change by habitat group (hectares)

