



Swartling Wood Coton in the Elms Derbyshire DE12 8DY

Planning Design and Access Statement

Creation and operation of a natural woodland burial ground with associated access arrangements and parking

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/1 Introduction

- 1.1.1. PWA Planning is retained by The Woodland Burial Group Limited ('the applicant') to submit a full planning application for the creation and operation of a natural woodland burial ground at Swartling Wood, located to the north of Coalpit Lane, Coton-in-the-Elms, Derbyshire ('the Site').
- 1.1.2. The proposed development seeks to establish a low-impact, landscape-led woodland burial ground within an existing area of woodland. The development comprises natural burial and interment plots integrated within the woodland setting, together with informal paths, limited areas of permeable surfacing for parking, and access arrangements utilising the existing forestry track. No buildings, external lighting or formal memorial structures are proposed.
- 1.1.3. The proposal responds to the recognised shortage of cemetery provision within South Derbyshire, as identified in Policy INF9 and paragraph 9.66 of the adopted Local Plan. The emerging Local Plan Part 1 Review (2022–2041) reiterates that this shortage remains likely to affect the whole District in coming decades. The development also secures the long-term stewardship of woodland within the National Forest, consistent with the objectives of Policy INF8.
- 1.1.4. This application follows pre-application discussions with South Derbyshire District Council, with written advice provided on 18 September 2025 (reference: DMPP/2025/1094). The submission has been prepared having regard to that advice.
- 1.1.5. This Planning Design and Access Statement should be read in conjunction with the submitted application package, which includes the following documents and drawings:
- Application Form and Certificates
 - Drawn Information
 - Site Location Plan
 - Existing Block Plan
 - Proposed Block Plan
 - Planning Design and Access Statement (this document)

- Arboricultural Impact Assessment (E3P Ref: 82-566-R2-1)
- Tree Location Map and Report (E3P Ref: BS5837 Report - Swartling Wood)
- Preliminary Ecological Appraisal (E3P Ref: 82-566-R1-1)
- The Statutory Biodiversity Metric Calculation Tool
- Statutory Biodiversity Metric Report (E3P Ref: 82-566-R3-1)
- Nutrient Neutrality Technical Note (Gondolin Land & Water Ltd Ref: GON.1025.0531)
- Flood Risk Assessment (Gondolin Land & Water Ltd Ref: GON.1025.0531)
- Transport Statement (PSA Design Ltd Ref: T4773-R-01)
- Proposed Access and Visibility Splays Drawing (PSA Design Ltd Ref: T4773-H-01 Rev P1)

- 1.1.6. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. This Planning Statement demonstrates that the proposed development accords with the relevant policies of the adopted development plan and that there are no material considerations which would indicate that planning permission should be withheld.
- 1.1.7. Should the Local Planning Authority require any further information or clarification during the determination of the application, it is requested that the Agent be contacted in the first instance.

/2 Site Description and Context

2.1. Site Location

- 2.1.1. The application site comprises approximately 17.55 acres (7.1 hectares) of woodland known as Swartling Wood, located to the north of Coalpit Lane, Coton-in-the-Elms, Derbyshire. The site lies within a rural area to the south of Swadlincote and falls within the administrative area of South Derbyshire District Council.

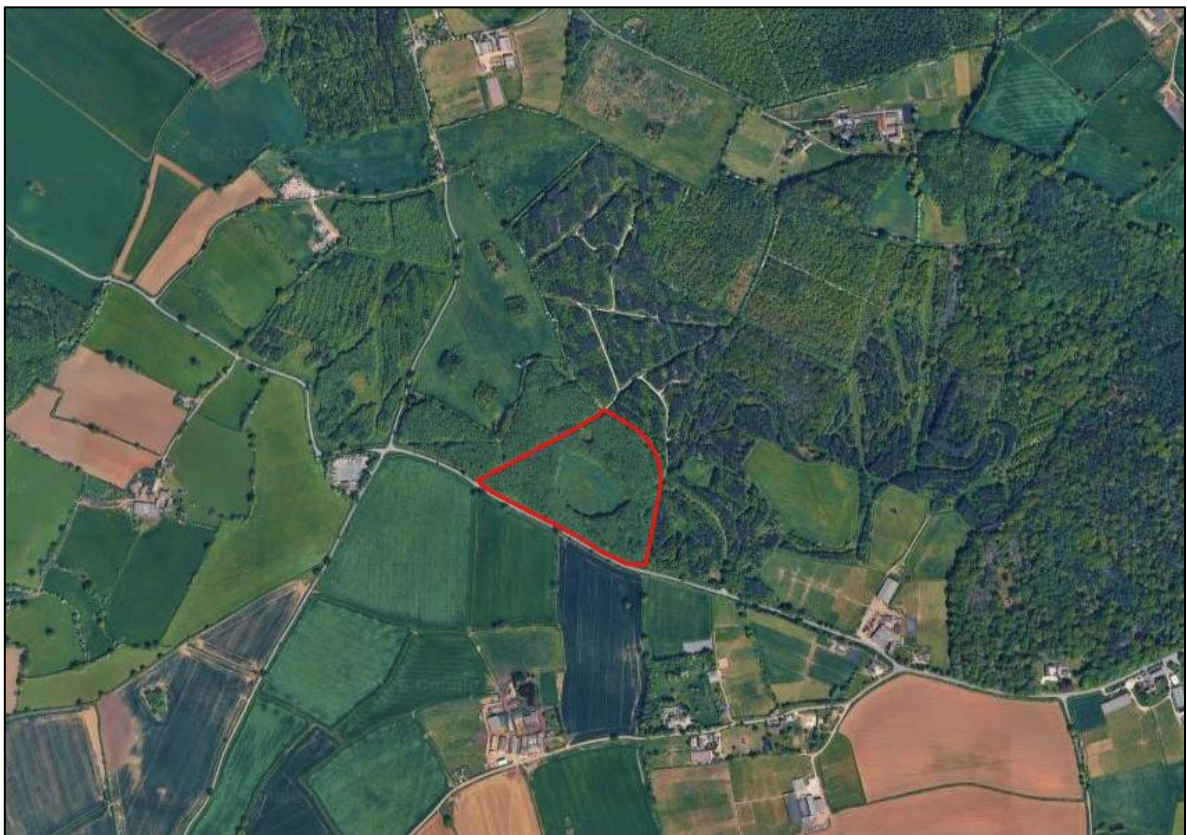


Figure 1: Satellite imagery showing the site boundary (outlined in red) within its wider surrounding context.

- 2.1.2. Swartling Wood forms part of a wider woodland block known as Grangewood, established under the National Forest Tender Scheme in 1999 on former agricultural land. The surrounding area is characterised by woodland and agricultural uses, with nearby settlements separated from the site by open countryside. The nearest village, Coton-in-the-Elms, is located approximately 2.2 km to the north-west of the site, with the nearest larger town, Swadlincote, located approximately 8 km to the north-east.

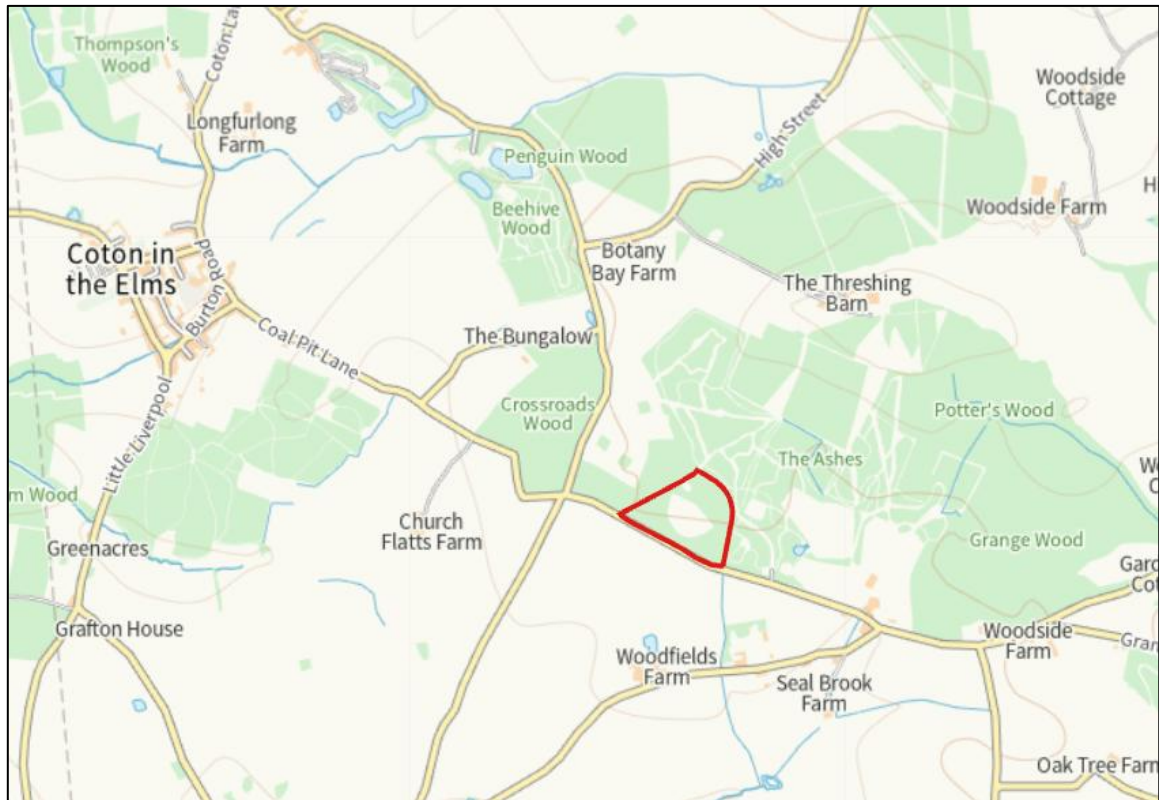


Figure 2: OS Map showing the site boundary (outlined in red) in context, including surrounding woodland and the nearby settlement of Coton in the Elms.

2.2. Boundaries and Land Ownership

- 2.2.1. The site comprises a single, clearly defined parcel of land within the ownership of the applicant. Boundaries are largely formed by woodland edges, existing tracks and adjoining agricultural land, rather than formal fencing or built boundary treatments. The existing woodland planting provides a strong sense of containment and enclosure.

2.3. Existing Land Use and Site Characteristics

- 2.3.1. The site is currently in use as managed woodland, incorporating areas of grassland and meadow. The woodland is relatively young, having been planted circa 2009, and comprises a mix of tree species typical of National Forest planting, including oak (*Quercus robur*), silver birch (*Betula pendula*), field maple (*Acer campestre*), wild cherry (*Prunus avium*) and hawthorn (*Crataegus monogyna*). Internal rides and open areas contribute to a varied but managed woodland character.

2.3.2. The site comprises generally flat land. Existing access within the site is informal and associated with woodland management, comprising tracks and paths rather than engineered routes.



Figure 3: Site Photographs of Existing Woodland, Site Entrance, and Access Track

- 2.3.3. A public right of way passes through the site; however, it follows the western boundary and does not fragment or subdivide the landholding. There are no existing buildings, structures or domestic features within the site. Existing activities are limited to woodland management and informal pedestrian use.

2.4. Surrounding Land Uses and Context

- 2.4.1. The site is situated within a predominantly rural setting. Surrounding land uses include areas of woodland and agricultural land, with a dispersed pattern of development comprising farmsteads and small clusters of buildings in the wider area.
- 2.4.2. The woodland forms part of the wider National Forest landscape and contributes to a continuous network of tree cover across the area. Parts of the wider woodland are under differing ownership and management regimes to the site.

2.5. Access and Transport Context

- 2.5.1. Existing vehicular access to the site is taken from Coalpit Lane via an existing woodland track. The track runs along the north-western boundary of the site before extending into the wider woodland area and forms part of an established network of forestry access routes.
- 2.5.2. Coalpit Lane is a rural local road serving agricultural land, woodland and dispersed properties. There are no formal footways along Coalpit Lane in the vicinity of the site, reflecting its rural character.
- 2.5.3. Internal movement within the site is currently informal and predominantly pedestrian in nature, reflecting its existing use as a managed woodland.
- 2.5.4. Public rights of way are present within the wider Grangewood and Coton Wood area, including a route which runs alongside the existing access track along the western boundary of the site, connecting to Coalpit Lane.

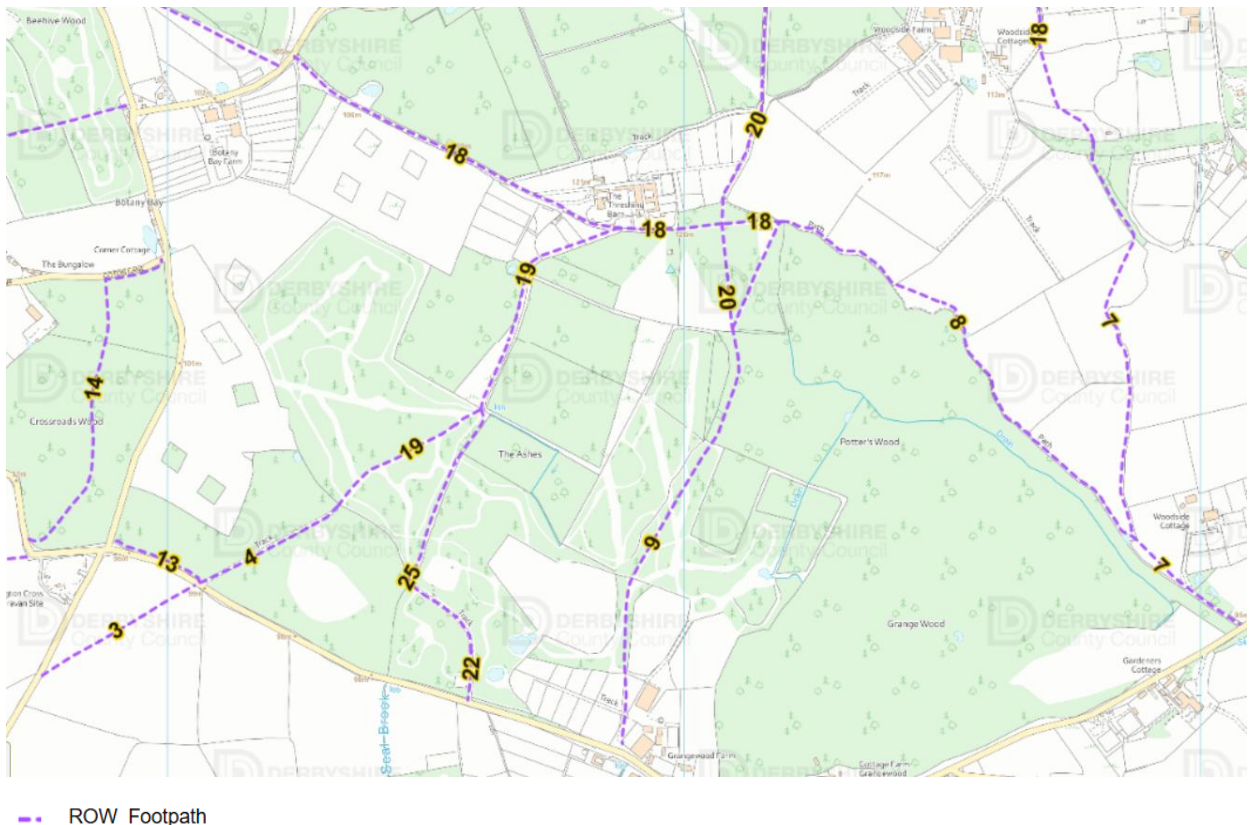


Figure 4: Public rights of way in relation to the site and surrounding area

- 2.5.5. The site is not located within convenient walking distance of regular public transport services, which is characteristic of its rural woodland location. Access to the site is primarily by private vehicle, consistent with other forestry and countryside-based uses in the area.
- 2.5.6. In addition to the vehicle access serving the site, there is a publicly accessible National Forest car park located to the east of the site along Coalpit Lane, which provides an alternative parking location for visitors accessing the wider woodland area, including Swartling Wood.

2.6. Landscape and Environmental Constraints

- 2.6.1. The site is subject to several landscape and environmental considerations arising from its location within a rural woodland setting and the River Mease catchment.
- 2.6.2. Environment Agency Flood Map for Planning identifies the site as lying entirely within Flood Zone 1, indicating a low probability of flooding.

- 2.6.3. The site lies within the catchment of the River Mease Special Area of Conservation (SAC). The River Mease SAC is designated for its ecological importance and is sensitive to changes in water quality and surface water inputs. Surface water drainage within the site reflects natural woodland conditions, with runoff influenced by landform, vegetation cover and soil characteristics. Further detail relating to nutrient and hydrological considerations is provided within the submitted Nutrient Neutrality Technical Note and Flood Risk Assessment (Gondolin Land & Water Ltd Ref: GON.1025.0531).
- 2.6.4. The site comprises managed mixed-species woodland with associated open areas, hedgerows and woodland edge habitats. Baseline ecological conditions have been established through a Preliminary Ecological Appraisal (E3P Ref: 82-566-R1-1) submitted in support of this application.
- 2.6.5. As stated above, tree species within the site comprise oak (*Quercus robur*), silver birch (*Betula pendula*), field maple (*Acer campestre*), wild cherry (*Prunus avium*) and hawthorn (*Crataegus monogyna*), consistent with typical National Forest planting.

/3 Proposed Development

3.1. Overview

- 3.1.1. The proposed development comprises the use of the site as a natural woodland burial ground, operating on a low-intensity, landscape-led basis and integrated within the existing woodland environment. The proposal is largely a change in land use, characterised by minimal physical intervention, with only limited ancillary works required to support access and circulation. No buildings, engineered structures, or formalised development features are proposed, and the woodland would remain the dominant feature of the site, with activity occurring intermittently rather than continuously.

3.2. Operational Arrangements and Opening Hours

- 3.2.1. The woodland burial ground would operate on a low-intensity basis, with approximately 3–4 burial services per week. In addition to burial services, interments of cremated remains would take place periodically throughout the year. Services would occur on an ad hoc basis rather than at fixed or regular intervals.
- 3.2.2. Burial services and associated vehicular access would be restricted to daylight hours only, reflecting the absence of external lighting and the rural woodland setting. Vehicular access to the site and use of the parking area would be limited to defined operating hours associated with burial activity and site management.

3.3. Burial Plots and Interment Arrangements

- 3.3.1. Interments would be undertaken in accordance with natural burial principles, using biodegradable coffins or shrouds only. Graves would be prepared and reinstated by hand, without the use of mechanical excavation, and without concrete linings or vaults.
- 3.3.2. Burial plots would be dispersed throughout the woodland and meadow areas, positioned to avoid harm to existing trees and habitats and to reflect the informal character of the landscape.

3.3.3. The location of burial plots would be recorded using a digital mapping and GPS-based system to ensure accurate long-term record keeping. Not all graves would be physically marked on the ground, reflecting the informal character of the woodland burial ground and avoiding the proliferation of visible markers across the site.

3.4. Memorialisation

3.4.1. Memorialisation would be carefully controlled to ensure that it remains limited in extent and subordinate to the woodland setting. This may include small timber markers or plaques, positioned discreetly and at a modest scale. Where appropriate, memorial features may also take the form of simple habitat enhancements, such as bird or insect boxes, provided these are sensitively located and compatible with the management of the woodland.



Figure 5: Images of discreet memorialisation and burial stand taken at the applicants existing woodland burial site.

- 3.4.2. Formal headstones, kerbing, fencing or other conventional cemetery features are expressly excluded, as they would be inconsistent with the low-impact, landscape-led nature of the proposal and the intended character of the woodland burial ground.
- 3.4.3. The woodland burial use is intended to support the continued management and enhancement of the woodland, with burial activity forming part of a wider approach to landscape stewardship rather than displacing it.
- 3.4.4. The layout responds to existing woodland structure and clearings, with burial areas, paths and resting points integrated into the landscape rather than imposed upon it.

3.5. Paths, Circulation and Accessibility Within the Site

- 3.5.1. Internal circulation within the site would be provided by a network of informal paths linking the car parking area with burial plots and memorial areas. The paths are intended to be modest in scale and rural in character, reflecting the woodland setting and avoiding the introduction of engineered or urban footway features.
- 3.5.2. Where practicable, paths would follow existing routes and natural desire lines through the woodland. Surfacing would comprise natural materials appropriate to a woodland environment and designed to be permeable, with the precise specification informed by ground conditions and ongoing woodland management.
- 3.5.3. The layout of paths seeks to enable access on foot throughout the site, while recognising the inherent constraints of a rural woodland environment. Vehicular movement within the site would be limited and generally confined to existing tracks and the parking area, with pedestrian access forming the primary means of circulation.

3.6. Phasing and Establishment

- 3.6.1. The proposed woodland burial use would be established on a phased and incremental basis, reflecting the nature of the use and the intention to always retain the woodland as the dominant

feature of the site. Initial works would be limited to access arrangements, the formation of informal paths, and the preparation of burial areas where required.

- 3.6.2. Burial areas would come into use progressively over time, in response to demand and informed by woodland management considerations. This approach ensures that change to the site is gradual and controlled, allowing the landscape to continue to mature and evolve throughout the lifetime of the development.

3.7. Site Infrastructure and Surfacing

- 3.7.1. Site infrastructure would be minimal and limited to that necessary to support the use of the land as a woodland burial ground. This includes the surfacing of a small existing clearing for use as a car park and the provision of two passing places on the eastern side of the existing access track to allow vehicles to pass safely, without any widening of the track itself.
- 3.7.2. All surfacing within the site, including paths, parking areas and the access track, would utilise natural and permeable materials suitable for a rural and woodland setting, while seeking to provide reasonable accessibility for visitors where practicable. Any signage would be discreet and functional in nature, designed to assist visitors without detracting from the character of the site.
- 3.7.3. No buildings, permanent structures, external lighting or utilities infrastructure are proposed as part of the development.
- 3.7.4. The site would operate in accordance with a "leave no trace" management principle, consistent with the existing woodland management approach and the low-impact ethos of the proposal. Memorialisation and tributes would be limited to environmentally sensitive and biodegradable materials only, with no permanent waste storage or refuse facilities proposed within the woodland. Ongoing site management would ensure that the landscape remains informal, uncluttered and consistent with its intended woodland character.

3.8. Summary

- 3.8.1. The proposed development comprises a low-impact, landscape-led woodland burial use designed to integrate sensitively within the existing woodland environment. The layout, circulation, and infrastructure are intentionally modest in scale, with an emphasis on natural materials and minimal physical intervention.
- 3.8.2. The proposal avoids built development and conventional cemetery features, instead supporting a use that is compatible with long-term woodland management and the established rural character of the site.
- 3.8.3. The development would also generate three full-time equivalent positions, comprising two on-site roles responsible for day-to-day woodland management and burial operations, and one off-site role coordinating burial arrangements and overall site management.

/4 Pre-Application Advice

- 4.1.1. Pre-application advice was sought from South Derbyshire District Council in relation to the proposals. Written advice was provided by the Council on 18 September 2025 under reference DMPP/2025/1094 and has informed the preparation of the submitted planning application.
- 4.1.2. The pre-application advice indicated that the principle of the creation and operation of a natural woodland burial ground in this location is acceptable, subject to certain material considerations being appropriately addressed through a planning application. These included the rural location of the development, access, traffic and parking arrangements, the impact on the existing woodland, ecology and biodiversity (including biodiversity net gain), surface water and drainage considerations within the River Mease Special Area of Conservation catchment, and matters relating to amenity and the operational management of the site.
- 4.1.3. The submitted planning application has been prepared having regard to this advice. The principle of development is addressed within the Planning Policy Context and Planning Assessment sections of this Statement.
- 4.1.4. In response to the matters raised, the application is supported by a River Mease Drainage Statement, an Arboricultural Survey and Arboricultural Impact Assessment, and a Preliminary Ecological Appraisal.
- 4.1.5. Site access and highway matters were identified through the pre-application process as requiring detailed consideration, including visibility splays, traffic generation and the suitability of the existing access track. In response, a Topographic Survey of the site entrance and access route has been undertaken and a Transport Statement prepared, incorporating traffic survey data and visibility analysis. The proposed access arrangements and parking provision are described in Section 5 of this Statement, with policy compliance assessed in Section 7.
- 4.1.6. Matters relating to amenity and the operational management of the site are addressed through the proposals described within this Statement and the accompanying supporting documentation. Through the pre-application engagement process, the Council identified

access arrangements and operational management as key material considerations. The submitted application therefore provides an appropriate level of detail in respect of these matters to enable consultees and the Local Planning Authority to properly assess the proposal.

/5 Design and Access Statement

5.1. Introduction

5.1.1. This Design and Access Statement has been prepared to demonstrate that the applicant has considered issues of design and access in preparing the planning application for the proposed development.

5.1.2. In line with relevant guidance (Making an application – GOV.UK), this statement:

- a) Explains the design principles and concepts that have been applied to the proposed development; and
- b) Demonstrates the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account.

5.1.3. Access arrangements are also explained below.

5.2. Design Principles

5.2.1. The overarching design objective is to deliver a natural woodland burial ground that is low intervention, landscape-led and respectful of the existing woodland environment.

5.2.2. The proposal seeks to integrate burial activity within the established woodland structure rather than introduce formalised cemetery infrastructure. No buildings, lighting columns, engineered hardstanding or urbanising features are proposed.

5.2.3. The design approach prioritises:

- Retention of existing trees and woodland structure;
- Use of existing access tracks;
- Minimal ground disturbance;
- Permeable surfacing materials consistent with forestry use; and
- Long-term woodland management and stewardship.

- 5.2.4. The proposal therefore reflects the ethos of natural burial and supports the continued management and enhancement of the woodland environment.

5.3. Site Context

- 5.3.1. The site comprises managed plantation woodland established as part of the National Forest programme. The woodland includes internal rides, open glades and an existing access track from Coalpit Lane.
- 5.3.2. In developing the proposal, the existing character and constraints of the site have informed the layout. Burial areas are positioned within parts of the woodland capable of accommodating them in line with established woodland management practices and without removal of high-quality trees, and arboricultural root protection areas have been respected.
- 5.3.3. The parking area is located within an existing woodland clearing to avoid unnecessary tree loss and to contain activity within an area already capable of accommodating vehicles.
- 5.3.4. The proposal therefore responds directly to the site's physical characteristics, retaining the woodland envelope and avoiding material alteration to the wider landscape.

5.4. Access, Parking and Operational Arrangements

- 5.4.1. Vehicular access will be taken from the existing access point on Coalpit Lane, utilising the established forestry track serving the woodland.
- 5.4.2. The internal access track functions as a shared-use woodland corridor. Given the limited and occasional nature of vehicle movements associated with burial services and visits, the continued shared use of this route is considered appropriate within its rural woodland context.
- 5.4.3. A modest parking area capable of accommodating approximately 26 vehicles, including funeral vehicles, will be provided within an existing clearing. Surfacing will comprise permeable crushed aggregate consistent with the existing track. No kerbing, marked bays, lighting or urban highway infrastructure is proposed.

- 5.4.4. During burial services, staff will be present on site to manage arrivals and departures and to direct vehicles to appropriate parking locations. This ensures orderly operation without the need for formalised infrastructure.
- 5.4.5. Pedestrian movement within the site will follow informal woodland paths. The parking area is located to minimise walking distances to burial areas where reasonably practicable and to limit the need for vehicle movements within the woodland. While the woodland environment necessarily constrains the extent of formal accessibility measures, reasonable and proportionate steps will be taken to ensure safe and inclusive access for visitors.

5.5. Summary

- 5.5.1. The proposal has been designed having full regard to the site's woodland context and operational requirements. It represents a low-impact form of development that retains existing features, utilises established infrastructure and integrates burial activity within a managed woodland environment.

/6 Planning Policy Context

6.1. Statutory Framework

- 6.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.1.2. The application site lies within the administrative area of South Derbyshire District Council. The Development Plan comprises the adopted South Derbyshire Local Plan Part 1 (2011–2028) and Local Plan Part 2 (2017).

6.2. Local Development Plan

South Derbyshire Local Plan Part 1 (2011-2028)

- 6.2.1. **Policy SD1 (Sustainable Development)** sets out the overarching approach to sustainable development within the District, seeking to balance social, economic and environmental objectives.
- 6.2.2. **Policy SD3 (River Mease Special Area of Conservation)** requires that development does not adversely affect the integrity of the SAC, including through changes to water quality or nutrient loading.
- 6.2.3. **Policy BNE3 (Biodiversity)** seeks to protect, enhance and restore biodiversity within the District. Development proposals are expected to safeguard designated sites and habitats and to deliver measurable biodiversity enhancements.
- 6.2.4. **Policy BNE4 (Landscape Character and Local Distinctiveness)** requires development to protect and enhance the character, quality and distinctiveness of the District's landscapes, ensuring that proposals respond positively to their landscape setting.
- 6.2.5. **Policy INF2 (Sustainable Transport)** requires development to provide safe and convenient access for all users, without compromising highway safety or local amenity.

- 6.2.6. **Policy INF7 (Green Infrastructure)** seeks to conserve, enhance and extend green infrastructure networks across the District, supporting development that protects ecological assets, improves habitat connectivity and increases access to green space.
- 6.2.7. **Policy INF9 (Open Space, Sport and Recreation)** supports the provision of open space and recreational facilities, including cemeteries, to address identified shortfalls across the District. The supporting text to the policy identifies a shortage of cemetery provision which is likely to affect the District over the plan period.

South Derbyshire Local Plan Part 2 (2017)

- 6.2.8. **Policy BNE5 (Development in Rural Areas)** sets out the circumstances in which development will be permitted outside defined settlement boundaries. Criterion (iii) allows development that is unavoidable outside settlement boundaries, provided it does not result in undue harm to landscape character, biodiversity, agricultural land or heritage assets.
- 6.2.9. **Policy BNE7 (Trees, Woodland and Hedgerows)** seeks to protect trees, woodland and hedgerows for their amenity, ecological and landscape value. Proposals affecting woodland are required to be supported by appropriate survey information and to demonstrate that impacts are avoided or appropriately mitigated.
- 6.2.10. **Policy INF8 (The National Forest)** supports the delivery of the National Forest Strategy and requires development within the National Forest to respond positively to its setting, including through appropriate woodland planting, landscaping and long-term management where applicable.

6.3. Material Considerations

- 6.3.1. The National Planning Policy Framework (2024) is a material consideration in the determination of the application. In particular, the following sections are relevant to the assessment of the proposal:

- **Section 2 Achieving Sustainable Development**, which sets out the social, economic and environmental objectives of sustainable development, including supporting accessible services and open spaces that reflect current and future needs and contribute to communities' health and well-being;
- **Section 6 Building a Strong, Competitive Economy**, which supports the sustainable development and diversification of rural businesses and community facilities;
- **Section 9 Promoting Sustainable Transport**, which confirms that development should only be refused on highways grounds where impacts on highway safety are unacceptable, or where residual cumulative impacts on the road network would be severe.
- **Section 11 Making Effective Use of Land**, which encourages the productive use of land while safeguarding environmental assets; and
- **Section 15 Conserving and Enhancing the Natural Environment**, which seeks to protect and enhance the natural environment, including biodiversity, natural capital and ecosystem services, and to secure measurable net gains for biodiversity where possible.

6.3.2. The emerging South Derbyshire Local Plan Part 1 Review (2022–2039) is also a material consideration. Although it is currently afforded limited weight, paragraph 10.64 of the Publication Draft reiterates that *“there is a shortage of cemetery space, which is particularly acute in the Swadlincote Urban Area and is likely to affect the whole District in coming decades”*. This confirms that the identified shortfall in cemetery provision remains a live and ongoing issue within the District.

/7 Planning Assessment

7.1. Principle of Development

- 7.1.1. Policy INF9 (Open Space, Sport and Recreation) of the South Derbyshire Local Plan identifies an existing and growing shortfall in cemetery provision across the District. The plan confirms that this pressure is particularly acute within the Swadlincote Urban Area but is expected to affect the whole District over the plan period. This position is reaffirmed in the emerging South Derbyshire Local Plan Part 1 Review (2022–2039). The proposed site is located approximately 4 miles from Swadlincote and is therefore well positioned to contribute to addressing this identified shortfall. The proposed development would directly respond to this need by providing additional burial capacity, providing additional burial capacity within the District.
- 7.1.2. The Site lies outside defined settlement boundaries, within the rural area of the District where Policy BNE5 (Development in Rural Areas) applies. Policy BNE5 makes allowance for certain forms of development outside settlement boundaries where it is demonstrated that the development is unavoidable in such locations. The proposed development is considered capable of satisfying criterion (iii) of Policy BNE5, as a natural woodland burial ground requires a woodland setting of an appropriate scale, character and environmental quality. Accordingly, the proposals accord with BNE5.
- 7.1.3. While Policy INF9 identifies an acute shortfall in cemetery provision within the Swadlincote Urban Area, opportunities to accommodate a woodland burial ground within settlement boundaries are limited and unlikely to be achievable. Settlements within South Derbyshire are generally characterised by higher development densities, fragmented green spaces and competing land use demands, and do not typically contain woodland sites capable of accommodating this form of burial provision without significant intervention or conflict with surrounding uses. On this basis, it is considered that there are no realistic or suitable alternative locations for a natural woodland burial ground within defined settlement boundaries.
- 7.1.4. The suitability of the site is further reinforced by the presence of an existing vehicular access from the public highway, established internal tracks capable of accommodating vehicles, and

an existing clearing for car parking of sufficient size to accommodate the anticipated visitor numbers associated with burial activity. This allows the proposed use to be delivered without the need for extensive new infrastructure, highway works or significant woodland clearance, thereby minimising landscape and environmental impacts and reinforcing the appropriateness of the Site for the proposed development.

- 7.1.5. The proposed development would meet an identified need for burial provision in a location that is appropriate in policy terms in line with INF9, BNE5 and evidence in the emerging Local Plan. The proposal also accords with the social objective of sustainable development set out in paragraph 8 of the NPPF (2024), by supporting accessible community infrastructure that reflects current and future needs and contributes to social and cultural well-being. The principle of the proposed development is therefore considered acceptable.

7.2. Landscape Character and the National Forest

- 7.2.1. Policy BNE4 (Landscape Character and Local Distinctiveness) seeks to protect and enhance the character, quality and distinctiveness of the District's landscapes. The Site lies within the National Forest, a strategic environmental initiative spanning approximately 200 square miles across parts of Derbyshire, Leicestershire and Staffordshire. Within South Derbyshire, the National Forest forms a defining landscape characteristic, particularly in and around Swadlincote and Burton upon Trent, where woodland creation and management are integral to the area's regeneration strategy.
- 7.2.2. The proposed natural woodland burial ground represents a low intensity use that is inherently compatible with the existing woodland character of the site and its wider National Forest context. The proposal retains the woodland structure, introduces no built form, and confines activity to existing clearings and internal tracks. As such, the development would not materially alter the character or appearance of the wider landscape and supports the objectives of Policy BNE4 and Policy INF8 in securing the long-term stewardship of woodland within the National Forest.

7.2.3. The applicant has engaged with the National Forest Company in advance of submission and has provided ecological and arboricultural information relating to the proposed use. The proposal aligns with the National Forest's objectives of woodland creation, habitat enhancement and sustainable woodland-based enterprise. Ongoing dialogue will continue as the proposal progresses to ensure that woodland management and stewardship objectives are mutually supported.

7.3. Woodland and Arboricultural Impact

7.3.1. An Arboricultural Impact Assessment (AIA) has been prepared by E3P (Ref: 82-566-R2-1, February 2026) and accompanies this application. The site comprises managed woodland established as part of the National Forest. Three Category A trees are identified and are to be retained. The site is not subject to Tree Preservation Orders and no veteran or ancient trees are present.

7.3.2. The AIA confirms that tree removals would be limited and associated with selective thinning to facilitate burial plots and would not result in a significant adverse impact on the woodland structure. No high-quality trees are proposed for removal.

7.3.3. Any Root Protection Area incursions are identified as limited and capable of being managed through appropriate construction methodology and tree protection measures in accordance with BS 5837:2012.

7.3.4. Subject to the implementation of recommended tree protection measures, the proposal accords with Policy BNE7 and supports the long-term stewardship of woodland within the National Forest.

7.4. Access and Highway Safety

7.4.1. Policy INF2 (Sustainable Transport) requires development to demonstrate that safe and suitable access can be achieved for all users and that it would not result in a severe residual impact on the local highway network. This is consistent with para 116 of the NPPF (2024), which confirms that development should only be refused on highways grounds where there would be an

unacceptable impact on highway safety, or where residual cumulative impacts on the road network would be severe.

- 7.4.2. Pre-application advice confirmed that the principle of access via Coalpit Lane was acceptable, subject to detailed consideration of visibility, traffic generation, and the design of passing places and parking provision appropriate to the nature of the proposed use.
- 7.4.3. A Transport Statement has been prepared by PSA Design Ltd (Ref: T4773-R-01, February 2026) and accompanies this application. The assessment considers existing traffic conditions on Coalpit Lane, vehicle speeds, visibility requirements, trip generation, access track suitability and parking provision.

Visibility

- 7.4.4. An Automatic Traffic Count (ATC) survey was undertaken on Coalpit Lane between 15 and 21 December 2025 which established 85th percentile vehicle speeds of 46.5mph westbound and 44.7mph eastbound. These speeds have informed the required visibility splays in accordance with DMRB stopping sight distance guidance. The submitted access drawing (Ref: T4773-H-01 Rev P1) demonstrates that visibility splays of 2.4m x 124m (west) and 2.4m x 132m (east) can be achieved, subject to routine hedgerow management within the highway verge.

Traffic Generation

- 7.4.5. The proposed development would generate a very limited number of vehicle movements, with approximately 3–4 burials per week and typical attendance between 10–30 persons. Activity would occur between 10:00 and 14:30 on weekdays, outside peak commuter periods. The Transport Statement confirms that the resulting trip generation would be modest and would not materially affect the operation of Coalpit Lane.

Access Track and Public Right of Way

- 7.4.6. The internal access track is an established 4m wide crushed aggregate forestry road.. A Public Right of Way runs alongside the access corridor. The proposal does not alter the alignment or

character of the track. Passing places are proposed and the first 10 metres will be hard surfaced to prevent loose material being deposited on the public highway.

- 7.4.7. The proposed use would generate a low frequency of vehicle movements associated with approximately 3–4 burial events per week. In this context, the shared-use nature of the woodland corridor is considered appropriate and consistent with its established function as a managed forestry access route.

Parking

- 7.4.8. The proposed parking area would be located within the existing woodland clearing and would accommodate approximately 26 vehicles, including funeral vehicles. The parking surface will comprise permeable crushed aggregate consistent with the existing forestry access track, ensuring visual and functional continuity with the surrounding woodland. The surfaced extent will be confined to the existing clearing. The area includes sufficient turning space to allow vehicles to enter and exit in forward gear. The scale of provision ensures that vehicles would not park on Coalpit Lane.

Highway Policy Compliance

- 7.4.9. Having regard to the submitted Transport Statement and Visibility Assessment, the proposal would not result in an unacceptable impact on highway safety nor give rise to severe residual cumulative impacts on the local highway network. The development therefore complies with Policy INF2 and paragraph 116 of the NPP4 (2024).

7.5. Ecology

- 7.5.1. A Preliminary Ecological Appraisal (E3P Ref: 82-566-R1-1) accompanies this application and assesses the ecological baseline and potential effects of the proposed development. No statutory ecological designations affect the site itself.
- 7.5.2. The PEA identifies limited ecological constraints and confirms that the proposal has been designed to retain the woodland structure and higher-value habitats across the site, whilst introducing active management measures to support long-term ecological condition. The

report sets out proportionate precautionary and mitigation measures, including sensitive timing of vegetation clearance and implementation of precautionary working methods and sensitive timing of works.

- 7.5.3. Subject to the implementation of the precautionary measures identified within the PEA, the proposal would avoid significant ecological harm and provide a managed framework for the long-term stewardship of habitats on site. The development therefore accords with Policy BNE3 of the adopted South Derbyshire Local Plan and Section 15 of the NPPF (2024).

7.6. Biodiversity Net Gain

- 7.6.1. The Environment Act 2021 requires development to deliver a minimum 10% Biodiversity Net Gain (BNG), secured for a period of at least 30 years. A Biodiversity Net Gain Assessment, including the statutory biodiversity metric, accompanies this application (E3P, Ref: 82-566-R3-1). The assessment has been undertaken using the DEFRA Statutory Biodiversity Metric.
- 7.6.2. The submitted statutory biodiversity metric calculates the existing habitat units across the site and assesses the post-development position, incorporating habitat condition, distinctiveness and strategic significance in accordance with national guidance.
- 7.6.3. The assessment confirms that the proposal will achieve:
- A net gain of 7.06 habitat units, equating to 11.67%; and
 - A net gain of 1.57 hedgerow units, equating to 10.21%
- 7.6.4. The uplift is secured through on-site habitat enhancement, including the improvement of poor condition grassland to moderate condition lowland meadow, the provision of new species-rich native hedgerow planting, and long-term woodland management.
- 7.6.5. The metric confirms that the trading rules have been satisfied and that no off-site biodiversity compensation is required. The required Biodiversity Gain Plan will be secured in accordance with statutory requirements and approved prior to commencement. Subject to this, the

proposal complies with the statutory Biodiversity Net Gain requirements, Policy BNE3 of the adopted South Derbyshire Local Plan and Section 15 of the NPPF (2024).

7.7. River Mease Special Area of Conservation (SAC)

- 7.7.1. The site lies within the catchment of the River Mease Special Area of Conservation (SAC), a European designated site protected under the Conservation of Habitats and Species Regulations 2017. Policy SD3 of the South Derbyshire Local Plan requires development within the catchment to demonstrate that it will not adversely affect the integrity of the SAC, which is currently subject to nutrient pressures, particularly in respect of phosphorus. National policy similarly requires development to avoid harm to internationally designated sites.
- 7.7.2. Following pre-application advice, Natural England was consulted regarding the site's location within the River Mease SAC catchment (DAS case ref: 529886). Natural England confirmed that nutrient neutrality does not apply to the proposal but advised that supporting technical information be provided to inform the Local Planning Authority's Habitats Regulations Assessment (HRA) screening.
- 7.7.3. A Nutrient Neutrality Technical Note has therefore been prepared by Gondolin Land & Water Ltd and accompanies this application (Ref: GON.1025.0531, Rev1, dated 22/10/2025). The assessment concludes that the risk of phosphorus pollution arising from the proposed development is low, having regard to the clay-rich, low-permeability soils underlying the site, the absence of hydraulic connectivity to the River Mease or its tributaries, and the nature of the proposed use and drainage arrangements.
- 7.7.4. A Flood Risk Assessment confirms that the site lies wholly within Flood Zone 1 and is subject to no or low risk of flooding from all sources, further limiting any potential pathway for nutrient mobilisation (Ref: Gondolin Land & Water Ltd, Ref: GON.1025.0531).
- 7.7.5. On this basis, the proposal is not considered to give rise to a likely significant effect on the River Mease SAC, either alone or in combination with other plans or projects and therefore complies with Policy SD3 of the adopted Local Plan and the Habitats Regulations.

/8 Planning Balance and Conclusion

- 8.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.1.2. The proposed development responds to an identified and ongoing shortfall in cemetery provision within South Derbyshire, as recognised by Policy INF9 of the adopted Local Plan and reiterated within the emerging Local Plan Review. The proposal therefore addresses an established infrastructure need within the District.
- 8.1.3. The site lies outside defined settlement boundaries; however, Policy BNE5 makes provision for development that is unavoidable in such locations. A natural woodland burial ground is inherently dependent on a woodland setting of appropriate scale and character. The proposal is therefore capable of satisfying criterion (iii) of Policy BNE5 and is acceptable in principle.
- 8.1.4. The development has been designed to retain the woodland structure of the site and introduce active long-term management, consistent with Policies BNE4 and BNE7 and the objectives of the National Forest. No significant arboricultural harm would arise.
- 8.1.5. The proposal would be served by an existing access and internal forestry track. The submitted Transport Statement demonstrates that the development would not result in an unacceptable impact on highway safety nor give rise to severe residual cumulative impacts on the local highway network, in accordance with Policy INF2 and paragraph 116 of the NPPF.
- 8.1.6. Ecological effects have been assessed through the submitted Preliminary Ecological Appraisal. Subject to the implementation of precautionary mitigation measures, the proposal would avoid significant ecological harm and complies with Policy BNE3 and Section 15 of the NPPF.
- 8.1.7. The submitted Statutory Biodiversity Metric Assessment confirms that the proposal will deliver a net gain of 11.67% in habitat units and 10.21% in hedgerow units, exceeding the mandatory 10% requirement. The uplift is achieved entirely on-site through habitat enhancement and new

hedgerow creation, with no reliance on off-site compensation. The biodiversity gain will be secured for a minimum period of 30 years in accordance with the Environment Act 2021.

- 8.1.8. The site lies within the River Mease SAC catchment; however, the submitted Nutrient Neutrality Technical Note and Flood Risk Assessment confirm that the proposal would not give rise to a likely significant effect on the integrity of the SAC. The development therefore complies with Policy SD3 and the Habitats Regulations.
- 8.1.9. The proposal represents a low intensity use that introduces no built form, lighting or urban infrastructure and would preserve the character of the woodland setting. There are no material considerations that indicate that planning permission should be withheld.
- 8.1.10. For the reasons set out above, the proposed development accords with the Development Plan when read as a whole and with the National Planning Policy Framework. There are no material considerations that indicate planning permission should be withheld. Planning permission should therefore be granted.

/9 Appendices

9.1. Appendix A – The Woodland Burial Group Limited

- 9.1.1. This application is submitted on behalf of The Woodland Burial Group Limited, an established provider of natural burial grounds operating in accordance with recognised industry standards and ecological best practice.

Operator Background and Operational Approach

- 9.1.2. Woodland Burial Group Limited operates natural woodland burial grounds in the UK and brings substantial operational experience in the delivery and long-term stewardship of natural burial sites. Granville's Wood in Walton, Chesterfield, Derbyshire has been operating successfully since 2016 and is owned and operated by individuals with shared ownership interests in Woodland Burial Group Limited.



- 9.1.3. Granville's Wood was created through the restoration of a former monoculture pine plantation into a more diverse native woodland habitat. The site is managed in accordance with ecological best practice and has included the removal of invasive species, selective thinning to encourage native ground flora, habitat creation measures and structured woodland management.

- 9.1.4. Since opening, the site has facilitated over 170 burials and approximately 300 interments of cremated remains. The operation of the site demonstrates the applicants experience in managing burial activity within a sensitive woodland environment whilst maintaining ecological integrity.
- 9.1.5. All burials and interments at the operator's sites are undertaken using RTN (Return to Nature) Soil, a blended soil compound designed to support the natural decomposition process and mitigate potential soil imbalance effects associated with traditional burial and ash interment. Only biodegradable coffins and caskets are permitted.
- 9.1.6. Memorialisation is deliberately discreet and environmentally sensitive. Options typically include:
- Simple wooden plaques;
 - Native tree planting;
 - Wildlife habitat features such as bird boxes, bat boxes and insect habitats; and
 - Natural benches constructed from timber sourced within the woodland.
- 9.1.7. In operating its existing woodland burial site, Woodland Burial Group Limited works alongside local ecological stakeholders, including Wildlife Trusts, to monitor habitat improvements and biodiversity outcomes. Habitat creation measures at existing sites have included hedgerow planting, pond creation, habitat piles and native woodland diversification.
- 9.1.8. Woodland Burial Group Limited adheres to the Federation of Burial and Cremation Authorities (FBCA) Code of Practice and has been awarded a Gold Medal under the Greener Globe Funeral Standard. The company is also recognised by the Good Funeral Guide.
- 9.1.9. The experience gained through the successful operation of Granville's Wood demonstrates the applicant's capability to manage burial activity in a manner that prioritises ecological enhancement, sensitive memorialisation and long-term landscape stewardship.

9.1.10. The accompanying images illustrate the established character of the operator's existing woodland burial site, including examples of discreet memorialisation, habitat features and woodland management practices.



9.2. Appendix B – Return To Nature (RTN) Soil

Due to our
commitment to best
practice with regards to
environmental, social,
and governance issues
we are now approved to
carry the ESG Mark
www.esgmark.co.uk

By using this
blended soil to
neutralise your ashes
and grow a plant or
tree you are helping our
planet work towards the
Sustainable Development
Goal 15: Life on Land
sdgs.un.org



Get in touch

07889454192

katee.mends@naturaltransition.co.uk

www.rtnsoil.com

Company Registration: 11188201

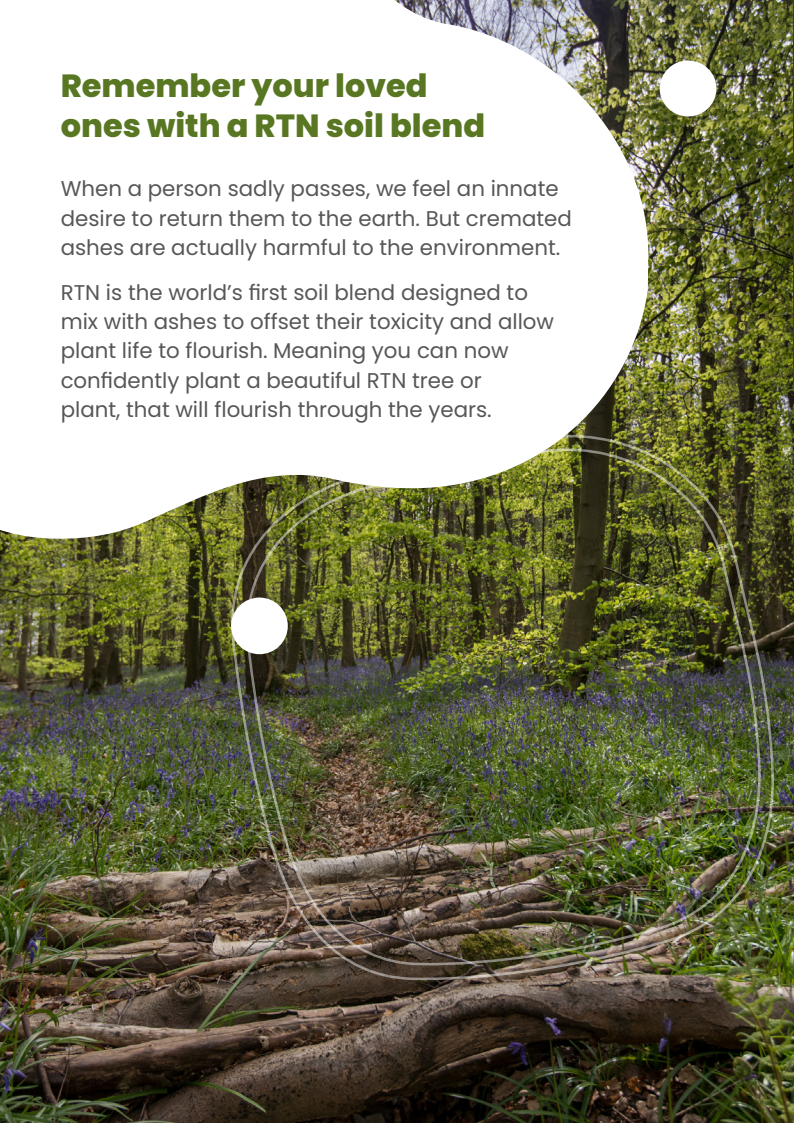
West Bridgford Business Centre, NG2 6AU

Protecting our environment for future generations

Return to Nature (RTN) soil blend is scientifically proven to solve the issue of toxicity present in human and pet cremated remains.



www.rtnsoil.com



Remember your loved ones with a RTN soil blend

When a person sadly passes, we feel an innate desire to return them to the earth. But cremated ashes are actually harmful to the environment.

RTN is the world's first soil blend designed to mix with ashes to offset their toxicity and allow plant life to flourish. Meaning you can now confidently plant a beautiful RTN tree or plant, that will flourish through the years.

“

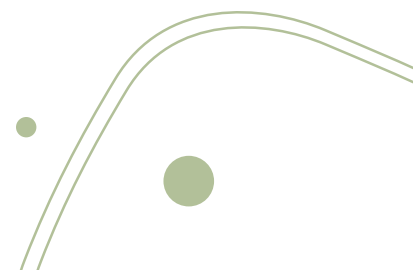
This product promotes biodiversity at all levels of an ecosystem, from microbe to mammal. It really is a revolutionary organic medium for driving the recycling of several elements that are absolutely crucial for life on our planet.

Prof. David Carter

Cremated Remains are toxic to our natural world

Cremated remains can be very harmful to plant life and ecosystems. When buried in the ground or scattered in large amounts, they alter the composition of the soil, causing long term damage and impacting future growth and regeneration.

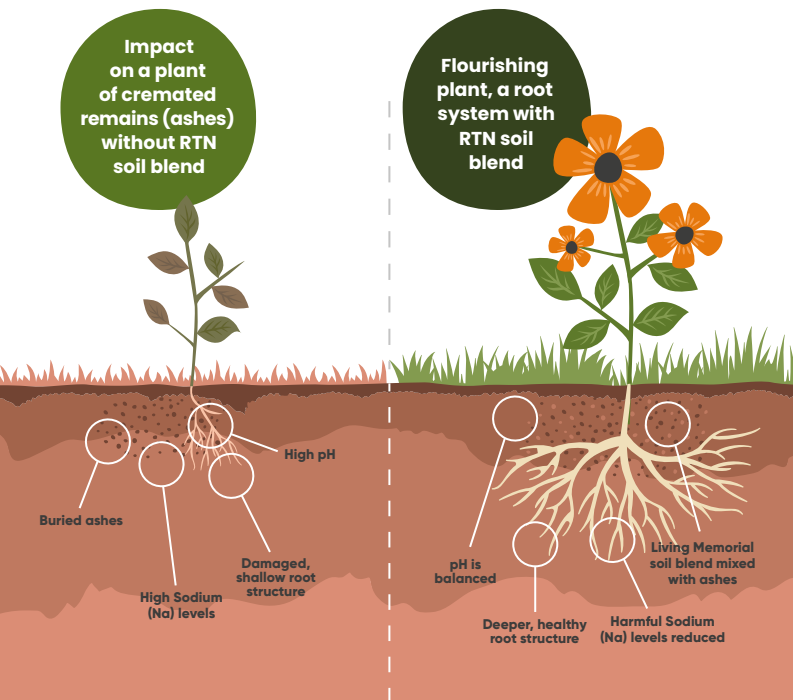
RTN soil blend, when mixed with cremated remains, has been scientifically proven to offset toxicity, releasing nutrients that allow plant life to flourish.



How it works

The two main problems that prevent plants from flourishing when in contact with cremation ashes are the high pH and high sodium content. Normal soil or compost can do nothing to solve that problem – but RTN soil blend is specifically formulated – and scientifically proven – to balance pH and reduce the effect of the sodium.

As the cremated remains are broken down more of the beneficial nutrients locked inside are released allowing the growing plant to flourish.



How to Use the RTN product:

The first thing to do, no matter how you intend to use the product, is to mix the RTN and ashes together. Carefully pour the ashes into the product and mix.

New planting/plant replacement:



If replacing, remove the old plant.



Dig a hole twice the size of the root ball of the new plant. Retain the contents of the hole in a container.



Thoroughly mix the whole bag of RTN soil blend with the contents of the hole.



Plant the new plant in the hole using the mixture of soil and RTN.



Water thoroughly. Do not apply fertiliser for at least 6 months after planting.

Ashes Interment:



Dig the interment hole.



Add half the bag of RTN soil blend to the bottom of the hole.



Inter ashes as normal.



Add the other half of the bag of RTN soil blend and mix thoroughly.



Fill in the hole as normal.

What We have Sent You

One bag of RTN soil blend is measured out to be enough for 1 full set of human ashes, 1 plant replacement or 1 new planting.

Also included is a box, tape and instructions, for the return of your empty used bags.

About Us

RTN Soil blend has been developed by scientists in the US after years of careful study, and adapted for use in the UK to suit our climatic conditions. It is the only scientifically proven soil available in the UK today.

Our requirement for a soil product that could balance the harmful effect of cremated remains originated in 2017 when we started our natural woodland burials in a beautiful location in Derbyshire, England.

We currently provide our soil through our own website, with wholesale partners, and with some of the largest organisations in the UK funeral sector who need our help to balance their land management after years of over-scattering and planting of toxic cremated remains.

We are part of the Faunus group of companies set up to specialise in producing environmentally beneficial, socially responsible projects and developing green industry.





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The
1908
Group