

From: David Dutton
Sent: Tuesday, May 14, 2024 1:08 PM
To: Clapworthy, Dean <D.Clapworthy@bury.gov.uk>
Subject: Planning application 70644 Land adj to 4 Holcombe Grove

Hi Dean

Thank you for consulting the GMEU

Summary

I note that the development appears to have commenced. The only ecological issue is biodiversity net gain.

Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain (BNG)

Section 180 of the NPPF 2023 states that the planning policies and decisions should contribute to and enhance the natural and local environment. I accept that the baseline for the site is bare ground as the site was cleared under a previous permission and not due to an attempt to reduce the baseline value of the site. I would however query whether this development is subject to any of the exemptions. For instance was the application actually received on the 2nd April as clearly it had commenced several years prior to this date. The 2nd April was the first date that this application would have been subject to BNG. Second would it be classed as self-build under the planning act. Again if this was the case it would be exempt.

Assuming 10% BNG is mandatory then the metric has not been filled in correctly, due to no fault of the applicant as the small metric is not as simple to use. I am still learning how to use it.

In my opinion none of the 120sqm of bare ground is retained or enhanced. What is occurring is the creation of 93sqm of garden and 27sqm of developed land as whilst appreciating that the 93sqm is biodiverse, under BNG any habitats within the curtilage of a domestic garden are still regarded as a garden unless the applicant can convince me otherwise. When these are put in the metric a net loss is achieved. This loss is however inflated by the use of the small metric, which simplifies all habitat conditions to moderate where applicable. The bare ground was clearly not in moderate condition as it was completely bare ie no vegetation. When I transferred the information in to the full metric and classed the baseline as poor the biodiversity unit loss equated to achieve 10% BNG is 0.01 BU.

The simplest solution is to pull back the boundary and plant the oak tree outside of the garden curtilage ie as amenity. One moderate sized urban tree would easily result in more than 10% BNG. A more complicated way of achieving on site would be to give the garage a sedum roof and green walls as these count separately to the vegetated garden.

Therefore assuming there are no reasons to exempt this development from mandatory 10% BNG, amendments are required to the metric in order to achieve 10% on-site BNG. There are however solutions, though I accept these are not ideal from the developers perspective, given the very low number of BNG units involved.

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