

Biodiversity Net Gain Assessment

Bleakholt Animal Sanctuary

Bury Old Road, Ramsbottom, Bury

May 2025

Prepared for: Bleakholt Animal Sanctuary

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This document is to be read in conjunction with:

- The Statutory Biodiversity Metric Calculation Tool– Bleakholt
- The Statutory BNG Habitat Condition Assessment – Bleakholt



EXECUTIVE SUMMARY

- On 15th May 2025 a site visit to inform the Biodiversity Net Gain Assessment was undertaken on land at Bleakholt Animal Sanctuary, Edenfield, Ramsbottom, Bury.
- The survey area comprises frequently mown modified grassland, developed land; sealed surface, artificially unvegetated, unsealed surface and sparsely vegetated land.
- The development will result in the loss of 0.015ha of modified grassland and 0.002ha of sparsely vegetated ground.
- The proposals will include the planting of 3 small broadleaved trees and creation of 0.0025ha of modified grassland.
- There will be a 12.69% increase in Habitat Units. Watercourse Units and Hedgerow Units are not applicable.

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1. Introduction

1.1 Application Site

- 1.1.1 This report details a Biodiversity Net Gain Assessment of land at Bleakholt Animal Sanctuary, Bury Old Road, Edenfield, Ramsbottom, Bury, BL0 0RX Ordnance Survey grid reference (centre of site): SD8057 1828.
- 1.1.2 Bleakholt Animal Sanctuary commissioned Verity Webster Ltd to undertake a Biodiversity Net Gain Assessment in order to inform the proposals for the site.

1.2 Objectives

- 1.2.1 The objectives of the Biodiversity Net Gain Assessment are to determine:
- Potential for enhancement or compensation (offsetting) on the site for protected species, habitats of conservation interest and overall biodiversity with the aim of achieving 10% net gain in biodiversity.

1.3 Proposals

- 1.3.1 The proposals comprise the construction of a new isolation and intake cattery.

1.4 Ecologist

- 1.4.1 The Ecological Assessment was undertaken by Verity Webster. Verity is a Chartered Ecologist and a full member of the Chartered Institute of Ecology and Environmental Management.
- 1.4.2 Verity has worked as an ecological consultant since 2007. She has undertaken Ecological Assessments and protected species surveys for a large variety of projects and schemes, producing the required impact assessment and subsequent mitigation schemes and method statements when necessary.

1.5 Landscape Design and Ecologist Limitations

- 1.5.1 This document includes recommendations for measures to achieve Biodiversity Net Gain (BNG). These recommendations do not comprise a landscape design or planting prescriptions as provided by a Landscape Architect and the ecologist has no Design Liability associated with these recommendations. This document includes measures to achieve BNG based upon the Proposed Site Plans provided by Kirkwells Planning Consultants.



2. Site Location and Description

2.1 Site Location

- 2.1.1 The survey site is located in a rural area of Edenfield, approximately 1km southeast of the outskirts of Edenfield village. The site lies approximately 540m east of the A56 Whalley Road which runs north to south through the landscape, and approximately 770m west of the M66 which also runs north to south. The A680 Rochdale road runs northwest to southeast approximately 500m to the east. Bury Old Road Runs south from Rochdale Road, serving the site.
- 2.1.2 The landscape immediately surrounding the site is open countryside comprising grazed pasture, arable land and on higher land to the east, moorland. There are scattered waterbodies and small waterways. Small plots of woodland are isolated along the waterways. See Figures 1 and 2.

2.2 Site Description

- 2.2.1 The survey site comprises part of the wider Bleakholt Animal Sanctuary. The site is located on the east side, close to Bury Old Road, almost central to the wider site, south of the car park.
- 2.2.2 The survey site comprises artificial unvegetated unsealed surface on the eastern half with sparsely vegetated land where ruderal plant species have colonised. Immediately outside the site to the east, a row of sycamore trees runs along Bury Old Road, under which there is modified grassland with tall forb.
- 2.2.3 The western half of the site comprises a footpath (developed land; sealed surface), and modified grassland, the majority of which is frequently mown and a small strip alongside the footpath remains unmanaged. There are three small fruit trees in the grassland to the west, immediately outside the site area.
- 2.2.4 See UK Habitat Classification Plan, Figure 3.



Figure 1: Ordnance survey map showing the location of the proposed development site.





Figure 2: Aerial image showing the proposed development site and immediate surroundings





3. Legislation

3.1 Planning Policy and Legislation

- 3.1.1 In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This is referred to as biodiversity net gain in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 3.1.2 Under the statutory framework for biodiversity net gain, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the biodiversity gain objective. This objective is to deliver at least a 10% increase in relation to the pre-development biodiversity value of the development granted permission. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits (Gov.Uk Biodiversity Net Gain, 2023).
- 3.1.3 Under the NERC Act 2006, planning authorities are obliged to make sure that they have all the information on the presence of protected species on site before they make a decision on the planning permission.
- 3.1.4 The National Planning Policy Framework (NPPF, 2021) encourages Local Planning Authorities to conserve and enhance biodiversity.

Chapter 15, Para 180 of NPPF states: *"The planning system should contribute to and enhance the natural and local environment by:*

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils....*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".*

Para 181 states: *"Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries."*

Para 185 identifies that plans should do the following to protect and enhance biodiversity and geodiversity:

- a) "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and peruse opportunities for securing measurable net gains for biodiversity."*

Para 186 states that *"when determining planning applications, local authorities should apply the following principles:*

- a) if significant harm to biodiversity from a development cannot be avoided...,adequately mitigated, or, as a last resort compensated for, then planning permission should be refused"*

- 3.1.5 The local planning authority has a responsibility, therefore, to obtain all information regarding the potential for protected species on a site prior to making a decision about a proposal.



4. Methodology

4.1 Site Survey

- 4.1.1 A site visit was undertaken on 14th May 2025 to inform the Biodiversity Net Gain Metric and Assessment. Habitats on site were assessed and described in accordance with UK Habitat Classification (UK Hab Ltd, 2023) and a list of conspicuous species recorded. The condition of the habitats was determined using the condition sheets provided for the Statutory Metric (DEFRA, 2023).
- 4.1.2 The Ecological Assessment was undertaken by Verity Webster BSc MSC CEcol MCIEEM. Verity is a Chartered Ecologist and a full member of the Chartered Institute of Ecology and Environmental Management.
- 4.1.3 Verity has worked as an ecological consultant for over 17 years. She has undertaken Ecological Assessments and protected species surveys for a large variety of projects and schemes, producing the required impact assessment and subsequent mitigation schemes and method statements when necessary.

4.2 Mapping

- 4.2.1 Habitats on site were mapped in accordance with UK Hab Classification (UK Hab Ltd, 2023). The minimum mapping unit adopted is 15m².

4.3 Biodiversity Net Gain Assessment

- 4.3.1 Biodiversity Offsetting was developed by Defra. The pilots of the study were first published in 2012.
- 4.3.2 The Biodiversity Calculator is a system created by Defra to quantify change in biodiversity of a site in biodiversity units.
- 4.3.3 *The Biodiversity Offsetting Pilots: Guidance for Developers* (Defra, 2012) details the original metric for calculating biodiversity loss or gain as a result of development proposal.
- 4.3.4 *The Statutory Biodiversity Metric* (DEFRA, 2023), *Condition Assessments* (DEFRA, 2023), *The Statutory Metric Use Guide* (DEFRA, 2024) and associated biodiversity metric principles were used to inform the assessment and the habitat condition and calculate potential change in biodiversity within the survey site.
- 4.3.5 For inclusion in the Statutory Metric, habitats below 25m² have been grouped where appropriate, that is, where they have the same distinctiveness level.
- 4.3.6 To determine strategic significance of the habitats at baseline and post-development, the relevant documentation was considered including Local and Neighbourhood Plans, Priority Habitats, Local Biodiversity Action Plans and Local Ecological Networks. When available the relevant Local Nature Recovery Strategy will be utilised for this purpose.
- 4.3.7 The Mitigation Hierarchy and the Biodiversity Net Hierarchy and was used to inform recommendations about habitat retention, loss, enhancement and creation as per the Biodiversity Net Gain: Good



Practice principles for development (CIRIA C776a, 2019).

Biodiversity Net Gain Principles (Table 4, p. 19, The Statutory Metric User Guide, 2024)

Principle 1 – The metric assessment should be completed by a competent person.

Principle 2 – The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licencing processes, for example woodlands.

Principle 3 – This biodiversity metric should be used in accordance with established good practice guidance and professional codes.

Principle 4 – This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.

Principle 5 – Biodiversity units are a proxy for biodiversity and should be treated as relative values.

Principle 6 – This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.

Principle 7 – Habitat interventions need to be realistic and deliverable within a relevant project timeframe.

Principle 8 – Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.

Principle 9 – This biodiversity metric does not enforce a minimum habitat size ration for compensation of losses. Proposals should aim to:

- Maintain habitat extent – supporting more, bigger, better and more joined up ecological networks.
- Ensure that proposed or retained habitat parcels are of sufficient size for ecological function.

4.4 Limitations

4.4.1 The survey work was undertaken in May 2025. May is an ideal time of year to undertake botanical survey. Although some species may not be conspicuous, given that they may not be emergent at this time of year, the species list is considered sufficient to inform the BNG Assessment.



5. Biodiversity Net Gain Assessment

5.1 Baseline condition and potential impacts on Biodiversity

Offsetting and the Biodiversity Calculator

5.1.1 The baseline condition of the habitat and the predicted change as a result of the proposals has been assessed with the use of the Biodiversity Offset principals.

5.1.2 Biodiversity offsetting principal: What is it?

“Using the biodiversity offsetting approach means that an offset provider delivers quantifiable amount of biodiversity benefit to offset the loss of the biodiversity resulting from the development. The losses and gains are measured in the same way, even if the habitats concerned are different. In the biodiversity offsetting pilot, the measurement is done in **‘biodiversity units’**, which are the product of the **size of an area**, the **distinctiveness** and the **condition** of the habitat it comprises. The assessment of biodiversity units lost and gained can be calculated” (Defra, 2012).

5.1.3 The Biodiversity Calculator is a system created by Defra to quantify change in biodiversity of a site in biodiversity units. The current calculator is known as Statutory Biodiversity Metric (Gov.UK Statutory Biodiversity Metric Tool, 2023).

5.1.4 This quantitative assessment will be considered in relation to the other qualitative ecological functions of the site in order to assess the impact (i.e. functionality for protected species), but is a useful tool to show predicted or potential loss of habitat, change in condition and enhancement (net gain).



Habitats at Baseline

- 5.1.5 The survey site comprises artificial unvegetated unsealed surface on the eastern half with sparsely vegetated land where ruderal plant species have colonised. Immediately outside the site to the east, a row of sycamore trees runs along Bury Old Road, under which there is modified grassland with tall forb.
- 5.1.6 The western half of the site comprises a footpath (developed land; sealed surface), and modified grassland, the majority of which is frequently mown and a small strip alongside the footpath remains unmanaged. There are three small fruit trees in the grassland to the west, immediately outside the site area.
- 5.1.7 The UK Habitat classifications are as follows:
- g4 106, 108 Modified grassland, mown/frequently mown
 - u1c Artificial unvegetated, unsealed surface
 - u1f Sparsely vegetated urban land
 - u1b6 Developed land; sealed surface

g4 Modified Grassland

- 6.1.2 The western half of the survey site comprises frequently mown modified grassland. Rye grass (*Lolium perenne*) is dominant with rare Yorkshire fog (*Holcus lanatus*), timothy (*Phleum pratense*), creeping buttercup (*Ranunculus repens*) and dock (*Rumex* sp.).
- 6.1.3 A strip of modified grassland is irregularly mown along the border of the footpath.
- 6.1.4 Under the sycamore trees to the east the grassland also supports tall forb species including cow parsley (*Anthriscus sylvestris*) and common nettle (*Urtica dioica*) with sparse bramble (*Rubus fruticosus* agg.).
- 6.1.5 This habitat is species poor, with under 6sp. per m².



The regularly mown modified grassland

u1f Sparsely vegetated urban land

- 6.1.6 Ruderal/ephemeral flora has colonised the boundaries of the artificial unvegetated unsealed surface. Species present include creeping buttercup, timothy grass, prickly sow-thistle (*Sonchus asper*), meadow buttercup (*Ranunculus acris*), dock and ragwort (*Senecio jacobaea*).



The sparsely vegetated urban land



u1c Artificial unvegetated unsealed surface

6.1.7 This is previously cleared and frequently disturbed land.

u1b6 Developed land; sealed surface

6.1.8 This comprises the footpath.



Showing the artificial unsealed surface, developed land; sealed surface, sparsely vegetated ground, modified grassland and sycamore trees along the wider eastern boundary.

Figure 3: The Survey Site – UK Habitat Classification Plan



Distinctiveness of the Habitat and Trading Rules

5.1.8 Under the Biodiversity Calculator principals each habitat is categorised into a distinctiveness band.

5.1.9 The distinctiveness of the habitat is based upon parameters such as species richness, diversity, rarity (at local, regional, national and international scales) and the degree to which a habitat supports species rarely found in other habitats (Treweek *et al*, 2010).

- Modified grassland is considered to have LOW distinctiveness.
- Sparsely vegetated land land is considered to have LOW distinctiveness.

Trading Rules

5.1.10 Habitats of low distinctiveness, if lost, must be compensated for with the same distinctiveness or better habitat.

Habitat Condition Assessment

5.1.11 The condition the habitat on site can be categorised as low, moderate or good and is based upon the Habitat Condition Assessment Sheets within the Statutory Biodiversity Metric.

5.1.12 The modified, highly maintained grassland is considered to be of poor condition because there are fewer than 6 vascular plant species per m² and the sward height is uniform.

5.1.13 The sparsely vegetated land is considered to be of poor condition as it is species poor and provides little variety of flora.

Strategic Significance

5.1.14 The strategic significance of the habitat present is based upon the value of the habitat in the wider landscape. Consideration is given to local and neighbourhood plans, priority habitats, local nature reserves and local ecological networks.

5.1.15 Modified grassland and sparsely vegetated land are not in the local policy and are not of conservation value. For this reason, the habitat has been recorded as 'not in local strategy/no local strategy'.



5.2 Achieving Biodiversity Net Gain

- 5.2.1 The EU is committed to halt the loss of biodiversity and the degradation of ecosystem services by 2020. The Biodiversity Strategy sets out 6 targets and 20 specific actions geared towards this overall objective. Action 7 is to ensure no net loss of biodiversity and ecosystem services.
- 5.2.2 The 'mitigation hierarchy' is included with current planning policy, aiming to halt the loss of biodiversity. The National Planning Policy Framework, consolidating planning guidance states that *'if significant harm cannot be avoided, adequately mitigated, or as a last resort, compensated for, planning permission should be refused'*.
- 5.2.3 Defra's biodiversity offsetting pilot was developed to address this requirement and ensure development, economic growth and biodiversity conservation are compatible (British Ecological Society, 2013).
- 5.2.4 Biodiversity net gain, as a good practice principal, has been developed by Ciria, CIEEM and IEMA (BNG, 2016). At the very least developments should aim for no net loss as part of the proposals.
- 5.2.5 The Headline Results in the Statutory Biodiversity Metric show the overall net change in Biodiversity Units as a result of the development and creation of new habitat.

Habitat Lost and Trading Rules

- 5.2.6 As a result of the proposals 0.015ha of modified grassland and 0.002ha of sparsely vegetated ground will be lost.
- 5.2.7 Due to the loss of the modified grassland and sparsely vegetated habitat, habitat of the same distinctiveness or better habitat is required.



Area habitats to be created

5.2.8 The following habitats are to be created on site:

- **0.0025ha of modified grassland**
- **3 small native broadleaved trees will be planted.**

5.3 Habitat Creation

Modified grassland

5.3.1 An area of 0.0025ha of modified grassland will be created on an area of previously sparsely vegetated land following construction of the building. This will be created by sowing a native species grass mix such as EG1 General Purpose Meadow Grass Mixture from Emorsgate Seeds.

Broadleaved Trees

5.3.2 Three small native trees will be planted. These could include rowan (*Sorbus aucuparia*), hazel (*Cotylus avellana*), crab apple (*Malus sylvestris*), cherry (*Prunus avium*) or birch (*Betula pendula*).

5.3.3 To achieve moderate condition, these trees must be cared for, and not pruned unless necessary.

5.3.4 Trees that die in the first couple of years must be replaced.



Planted Rowan



Planted Pendulous Birch



Planted crab apple

Figure 5: The Survey Site – Proposed Habitat Creation



5.4 Percentage Change in Biodiversity Units

Baseline Habitat Units: 0.06

Habitat Units Change: 0.01

Total percentage change in Habitat Units: 12.69%

- 5.4.1 The Statutory Biodiversity Metric shows there will be an increase of 12.69% biodiversity net gain in Habitat Units as a result of the proposals. There is no requirement for watercourse or hedgerow units as there are no linear habitats on site at baseline.



6. References

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