

70222 – Former Mondi/Holcombe Mill, Bridge Street, Ramsbottom

Thanks for the BNG assessment

Baseline

The baseline value of the site appears reasonable. I am willing to accept this as fixed should the development be withdrawn or refused, for any future applications once BNG becomes mandatory as I accept that this site is undergoing succession and increasing in biodiversity net gain value year on year, which if taken back in 2015 would have been much lower when the majority of the site was hardstanding or bare ground.

Post-development Value

Habitat Units - The biodiversity net gain assessment has calculated that more than 10% BNG is achievable. This is however highly reliant on the flood plain meadow achieving good condition. Given the likely recreational pressure and invasive species issues (two potential failure points) due to the proximity with the River Irwell, I would regard this as difficult to achieve without significant management input. There will also be difficulties achieving 10 species per sqm. I would have regarded moderate condition a more realist target, which would achieve a small biodiversity unit loss of 0.14BU. Other areas of habitat creation have also been given target conditions of good, which are again optimistic but have less effect on the overall outcome. Fairly good condition achieves a 5.86% gain which given BNG is not as yet mandatory could be regarded as acceptable.

Hedgerow Units - I have no issues with the hedgerow units given the very low baseline.

Watercourse Units - I note that no river units have been calculated. However, whilst these would be required once mandatory given works will occur within 8m of the river, given hardstanding is being replaced with grassland, it is clear that more than 10% BNG will be achieved for watercourse units and therefore I would regard it as unreasonable to request the metric to include this element at present.

Conclusion

I would prefer a more resilient proposal for achievement of the habitat units, i.e. one that was not reliant on the grassland adjacent to the River Irwell achieving good condition, which I regard as unrealistic. Options include all trees planted being native, replacement of ornamental shrub planting with native mixed scrub, additional urban trees and efforts to retain more of the on-site trees. I therefore recommend amendments to post development proposals or a detailed justifications on how good condition would be achieved and maintained or acceptance that a slight loss at site level is likely and off-site compensation provided. This may in fact be less costly to the developer in the long term than trying to achieve good condition habitats on the site.

Ecologist
GM Ecology Unit