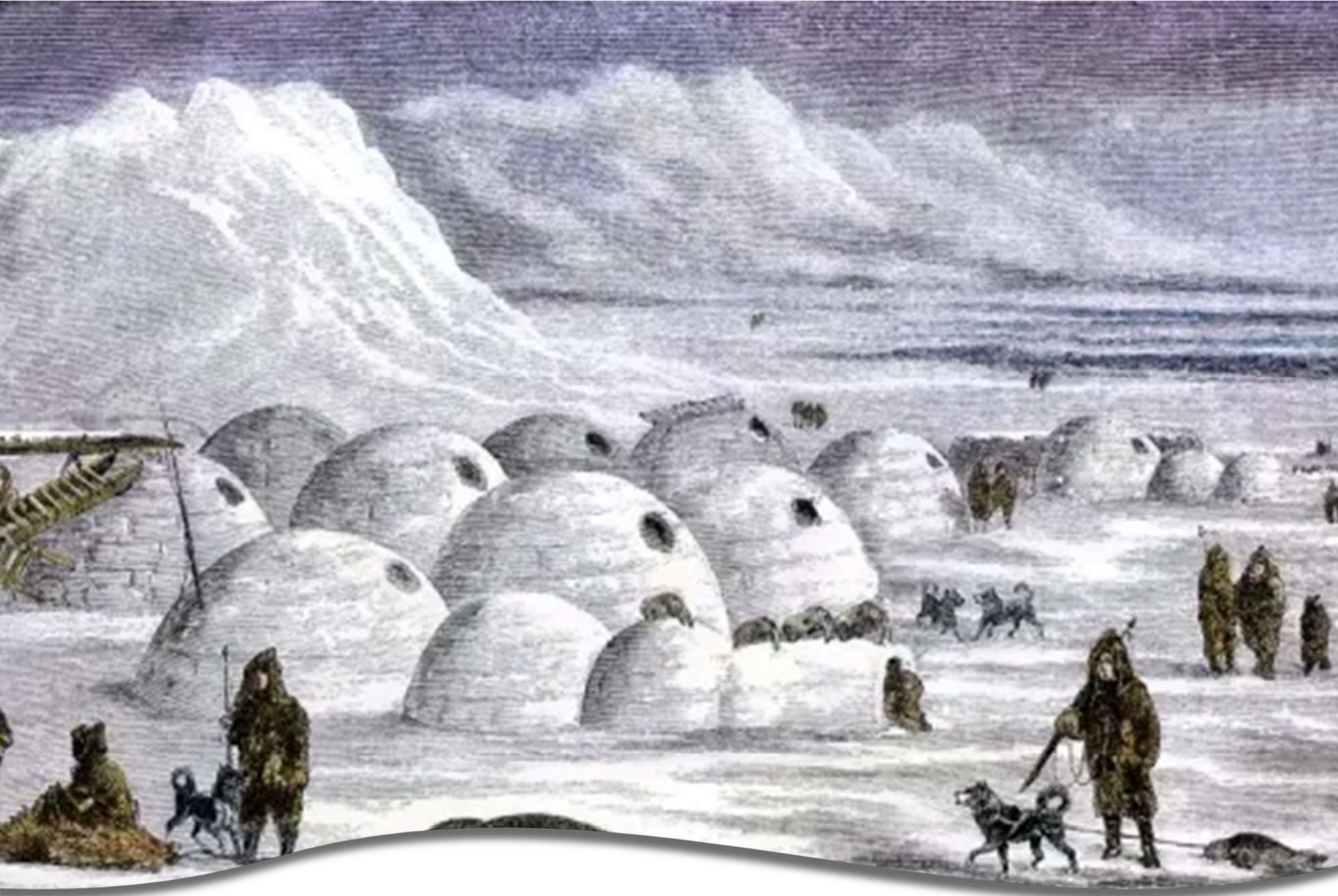




Biodiversity Net Gain

Client:	Titan Holdings Corporation Ltd
Site Address:	Former Fire Station The Rock Bury BL9 0NJ
Date:	15 June 2026

Document Overview

Site Address	Former Fire Station, The Rock, Bury, BL9 0NJ	Reference Number	258
Date of Inspection	10/03/2026	Rev Number	N/A
Survey/Report Description	Site Survey, BNG Metric and Desktop Study.		
Results	The biodiversity metric results show a loss of units based on the current landscape plans as follows: Habitat Units 0.34		
Recommendations	Given the current scheme and site cannot accommodate the net 10% gain, habitat units will likely have to be bought off-site.		

Table of Contents

1.0 Introduction	3
1.1 Purpose and scope of report	3
1.2 sources of information.....	3
1.3 Site Location	4
2.0 Planning and National Policy.....	5
2.1 National Planning Policy Framework (NPPF)	5
2.2 Local Planning Policy Framework	5
2.3 National Environmental Policy and Protections	6
3.0 Methodology	7
4.0 Desk top Study	8
5.0 Field Survey.....	9
5.1 Habitat Condition Assessment.....	9
5.2 Baseline Habitat Analysis	9
6.0 Metric Results	12
6.1 Habitat Retention	13
6.2 Habitat Loss	13
7.0 Conclusion	13
8.0 Appendix A - Plans	
9.0 Appendix B - Metric	

1.0 Introduction

1.1 Purpose and scope of report

1.1.1 Igloo has been instructed by MADP to conduct a Biodiversity Net Gain Assessment at the Former Fire Station, The Rock, Bury, BL9 0NJ and prepare the findings in a report and associated Statutory Metric.

This report outlines the potential for enhancement or off-setting and where necessary, recommendations will be given with intention to be in accordance with the current legislation surrounding Biodiversity Net Gain and how that effects planning.

1.1.2 The proposal is for the Change of Use to a Car Storage Yard.



1.2 sources of information

1.2.1 This report is based on the following sources of information and should be read in conjunction with this report, along with all other drawings alongside the application:

- National Biodiversity Network
- UK Habitat Classification Version 2.0
- 258 – Statutory Metric Rev A

- The Design Access Statement
- Associated Drawings and Levels
- MAGIC Map

1.3 Site Location

1.3.1 The site is a levelled piece of land on the footprint of a former fire station, with access from the south of the site by The Rock.



Source: Google Maps

1.3.2 The proposal is located in the centre of bury next to a shopping centre called The Rock.

- 1.3.3 The development is located across the entirety of the site.

2.0 Planning and National Policy

2.1 National Planning Policy Framework (NPPF)

- 2.1.1 The National Planning Policy Framework (NPPF) sets out government policy on biodiversity in planning decisions. Under the NPPF, the presence of a protected species is a material consideration when a planning authority is considering a development proposal.
- 2.1.2 Paragraph 165: *“Planning policies and decisions should be based on up-to-date information about the natural environment”*.
- 2.1.3 Paragraph 118: *“When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles”, which include (amongst others):*
- “If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.”*
- “Opportunities to incorporate biodiversity in and around developments should be encouraged.”*

2.2 Local Planning Policy Framework

- 2.2.1 The Places For Everyone Joint Development Plan Document For Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan outlines the districts framework for biodiversity and geological conservation, primarily through policy JP-G8 A Net Enhancement of Biodiversity and Geodiversity.
- 2.2.2 1.
- Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and those that support priority species;
- 2.2.3 3.
- Enhancing the management of existing habitats, including through habitat restoration, avoiding habitat fragmentation and combating invasive species;
- 2.2.4 4.

Protecting sites designated for their nature conservation and/or geological importance, with the highest level of protection given to international and then national designations;

2.2.5 Furthermore, policy JP-G8 outlines the expectations of developments to:

- a. Follow the mitigation hierarchy of:
 - I. Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts, then
 - II. Adequately mitigating any harm to biodiversity, then
 - III. Adequately compensating for any remaining harm to biodiversity
- b. Avoid fragmenting or severing connectivity between habitats;
- c. Achieve a measurable net gain in biodiversity of no less than 10%
- d. Make appropriate provision for long-term management of habitats and geological features connected to the development;
- e. Where appropriate, development should: mitigate air pollution impacts on Manchester Mosses SAC; mitigate urban edge, functionally linked land and recreation disturbance impacts on the South Pennine Moors SAC/SPAs; and assess and potentially mitigate boat movement, water pollution, and light spillage and shading impacts on the Rochdale Canal SAC; and
- f. Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s) in the PfE evidence base and/or any updated or appropriate biodiversity/ecological assessments submitted as part of the planning application process.

2.3 National Environmental Policy and Protections

2.3.1 The Environment Act (2021) is largely considered the most important piece of environmental legislation in the UK, coming into force in November 2021. BNG would be integrated into this act on the 12th February 2024, thus making BNG mandatory under Schedule 7A of the Town and Country Planning Act (1990).

2.3.2 The Environment Act (2021) is supported by secondary legislation, consisting of:

- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024
- The Biodiversity Gain Site Register Regulations 2024

- The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024

2.3.3 The Natural Environment and Rural Communities (NERC) Act (2006) stipulates that the Secretary of State should publish and maintain a list of habitats and species of ‘principal importance’.

Section 41

The Secretary of State must, as respects England, publish a list of the living organisms and types of habitat which in the Secretary of State's opinion are of principal importance for the purpose of conserving biodiversity.

Before publishing any list the Secretary of State must consult Natural England as to the living organisms or types of habitat to be included in the list.

Without prejudice to section 40(1), the Secretary of State must—

- take such steps as appear to the Secretary of State to be reasonably practicable to further the conservation of the living organisms and types of habitat included in any list published under this section, or
- promote the taking by others of such steps.

The Secretary of State must, in consultation with Natural England—

- keep under review any list published under this section,
- make such revisions of any such list as appear to the Secretary of State appropriate, and
- publish any list so revised as soon as is reasonably practicable after revising it.

3.0 Methodology

- 3.0.1 The Statutory Metric Tool Version 1.0.4 was used to generate the data found in **Appendix B**. Furthermore, the BNG values were calculated using the statutory metric guidance and UKHab version 2.0 methodology.
- 3.0.2 Strategic significance (or strategic location) of habitats was considered at both baseline and post-development as such, 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 strategy will be consulted to determine the significance of any habitat loss, mitigation or improvement.

- 3.0.3 any changes to the pre-assigned habitat distinctiveness by the metric, must be reasoned with evidence relevant to the site. Rarity of flora and fauna may increase distinctiveness whilst damage from fire or fly tipping may decrease distinctiveness.

- 3.0.4 The Habitat Condition Assessment was taken on 14/06/2026 using the standard Statutory Biodiversity Metric Condition Assessment Sheets, under guidance from the metric user guide.

The assessment measures varying quality of habitats against the “best case scenario” version of said habitat. The condition assessment sheets identify various components of habitats that would then determine the overall quality of a habitat. This is measured in Good, Moderate and Poor condition.

- 3.0.5 The baseline value of the site was determined on 10/03/2026. It is considered that there will be no substantive or material change between the date of survey and the publication of this report.

As of publication we have not been made aware of any degradation to biodiversity features on-site, purposeful or otherwise. Should the site be found to be significantly altered, a revised up-to-date metric would be due.

4.0 Desk top Study

- 4.0.1 It has been noted that the site **is not** designated for biodiversity, which was confirmed on 15 June 2026.

However, upon further investigation this site was found to be in a SSSI impact Risk Zone. Given the proposal does not include Aviation Infrastructure, Air Pollutants, or Combustion there should be no conflict.

- 4.0.2 The strategic significance of the site and habitats therein is based around the value of the habitat within the wider landscape. This determined by local and neighbourhood plans, priority habitats, local nature reserves and local ecological networks.

- 4.0.3 Biological records were obtained via the National Biodiversity Network with a search radius of 1.5km. Records suggest a recorded total of 927 species none of which are identified as being threatened or checklist species.

- 4.0.4 The biggest sensitivity found for this search radius was with endangered birds. Records suggest predominantly human observations of endangered or non-breeding birds within the search area.

Given that the trees on the development are to remain unaffected, it is believed that any possible adverse effects from the development to protected birds is unlikely.

5.0 Field Survey

5.1 Habitat Condition Assessment

- 5.1.1 The condition of a given habitat can be categorised as low, moderate or good, based upon the Habitat Condition Assessment Sheets within the Statutory Biodiversity Metric.

- 5.1.2 The overview of the UK Habitat Classifications and conditions, for the Baseline are as follows:

Habitat Type	Area (Hectares)	Condition	Habitat Units
Urban-Developed Land, Sealed Surface Habitat Ref: u1b6	0.3404	N/A	N/A
Sparsely vegetated Land-Ruderal/Ephemeral Habitat Ref: u1f	0.0126	Moderate	0.05
Heathland and Scrub-Mixed Scrub Habitat Ref: h3h	0.0685	Poor	0.27
Grassland-Modified Grassland Habitat Ref: g4	0.0294	Moderate	0.12
Individual Trees-Urban Tree	0.0163	Poor	0.07
Individual Trees-Urban Tree	0.0163	Moderate	0.14

5.2 Baseline Habitat Analysis

- 5.2.1 The Baseline BNG value was calculated using the Statutory BNG Metric in conjunction with UKHabs V2 methodology. The Baseline value was taken from the survey conducted on 10/03/2026, We consider there will be no substantive to change between the date of survey and the publication of this report as the site has remained untouched.

5.2.2 Urban-Developed Land, Sealed Surface Habitat Ref: u1b6

Developed sealed land is the predominant feature on-site, with the scrubs and sparsely vegetated land succeeding through the hardstanding and rubble.

5.2.3 **Sparsely vegetated Land- Ruderal/Ephemeral Habitat Ref: u1f**

The piles of rubble consist of sparse patches of grass, moss and assorted weeds, with some flowering plants increasing the value by providing nectar sources for a range of invertebrates across the year.



5.2.4 **Heathland and Scrub-Mixed Scrub Habitat Ref: h3h**

The scrub predominantly features butterfly bush (Buddleja), Self-seeded Silver Birch and Hazel shrubs, as well as knotweed on the northern most part of the site. The Silver Birch and Hazel Shrubs are all well below 100mm diameter and as such have not been recorded as individual trees.



5.2.5 **Grassland-Modified Grassland Habitat Ref: g4**

Overgrown grass from the pre-existing landscaping from when the site was still a fire station that has deteriorated due to poor maintenance and fly-tipping.



5.2.6 Individual Trees-Urban Tree (both)

The south eastern tree is of a severely impaired physiological condition, likely due to poor soils and fly-tipping, showing large gashes through the sapwood and very minor adaptations to said damage. The southern most tree is of unremarkable condition with very minor defects from fly-tipping and poor soils.



6.0 Metric Results

6.0.1 Based on the current landscaping proposals, the scheme will result in a 41.32% loss in Habitat units. In terms of specific unit changes, the metric output indicates a unit deficit of 0.34 Habitat units. The trading rules **are not** satisfied for the site.

6.0.2 Under the current proposal, for the development to achieve 10% net gain habitat units will need to be purchased from an off-site habitat bank.

Under the current shortfall 0.34 Habitat Units are required, this is also dependant on other factors such as a spatial risk multiplier which will inflate the number of units needed depending on the relative location of the habitat bank and the site itself.

6.0.3 The completed BNG Metric that accompanies this report or any future revised metrics which are more accurate should be submitted to the habitat banking company to aid in the calculation of habitat units needed.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.27
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-41.32%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

6.1 Habitat Retention

Habitat Type	Area (Hectares)	Condition
Urban-Developed Land, Sealed Surface Habitat Ref: u1b6	0.3404	N/A
Sparsely vegetated Land- Ruderal/Ephemeral Habitat Ref: u1f	0.0044	Moderate
Heathland and Scrub-Mixed Scrub Habitat Ref: h3h	0.0037	Poor
Grassland-Modified Grassland Habitat Ref: g4	0.0294	Moderate
Individual Trees-Urban Tree	0.0163	Poor
Individual Trees-Urban Tree	0.0163	Moderate

6.2 Habitat Loss

- 6.2.1 As a result of the proposal, the site has a net change of -41.32%. Whilst the site is predominantly hardstanding and grass the loss of invasive shrubs creates a unit shortfall that will likely have to be bought off-site to achieve the net 10% gain.

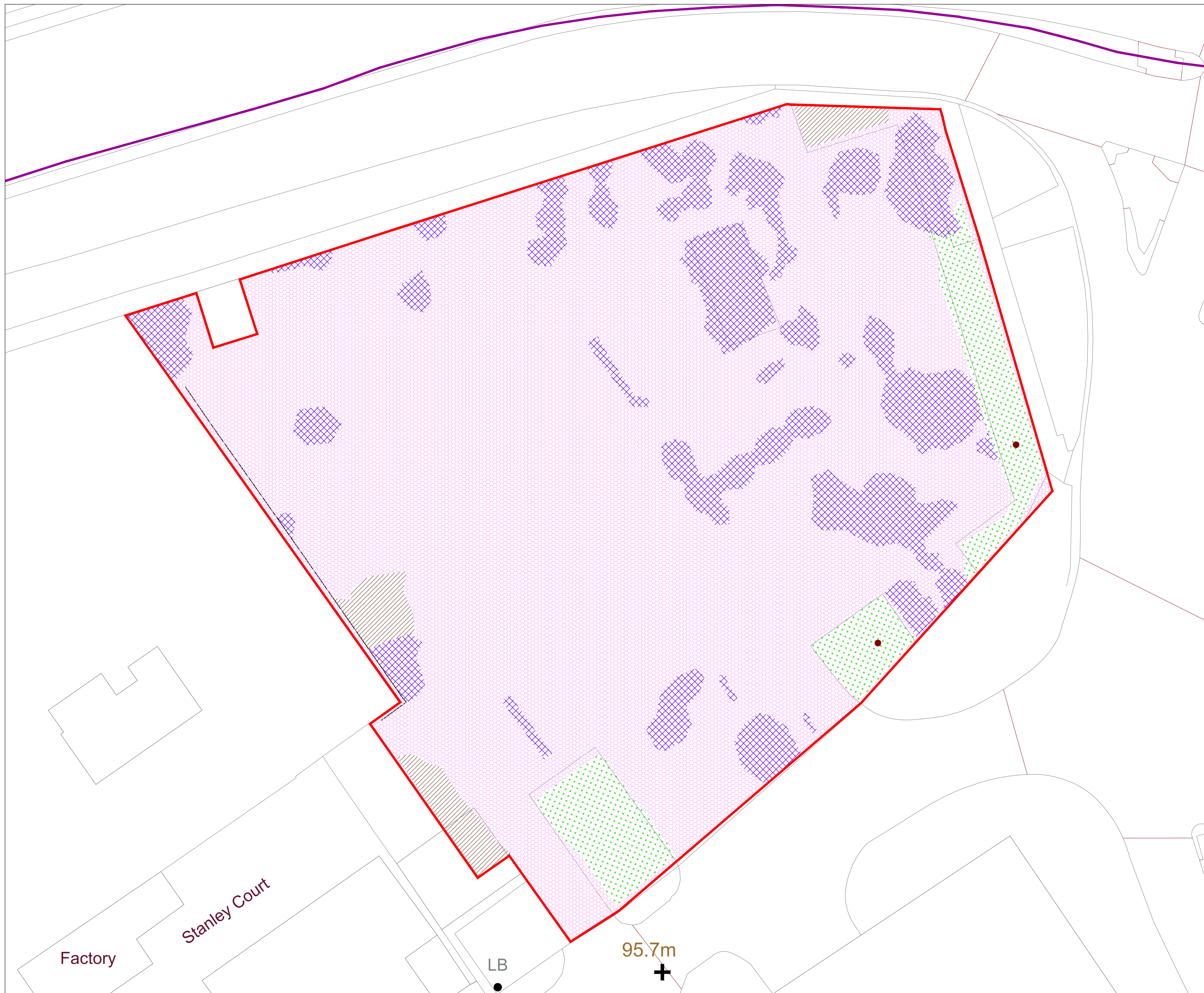
7.0 Conclusion

- 6.1 The NPPF puts emphasis on development delivering biodiversity enhancement above and beyond mitigating or compensating for any impacts (a 10% uplift). Where appropriate and feasible modifications have been made to uplift the site as to not incur a unit shortfall. However, it is not considered feasible at this time to achieve further habitat units on site.

- 6.2 In order to achieve the 10% net gain, habitat units will need to be purchased from an off-site habitat bank. Currently, the proposed development as a unit shortfall of 0.34 Habitat Units.

NOTE: a spatial risk multiplier is likely to inflate this number relative to the location of the habitat bank. The completed BNG metric that accompanies this report should be submitted to the habitat bank to assist in calculating the price of habitat units required.

8.0 Appendix A - Plans



Notes

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KEY



Development footprint



Tree Location



☒ h3h - Mixed Scrub



q4 - Modified Grassland



 u1f - Sparsely Vegetated Land



u1b5 - Buildings

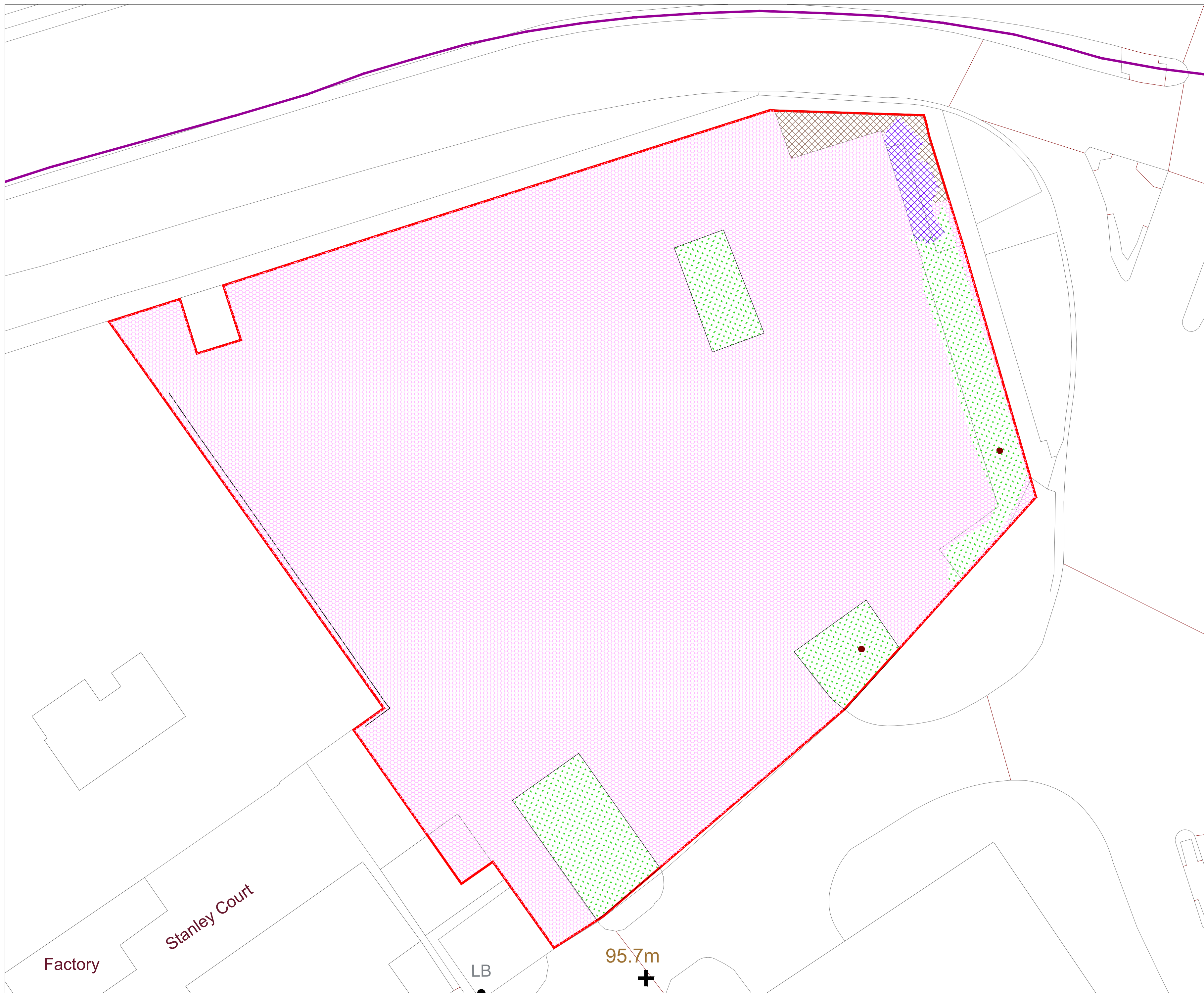


u1b6 - Other Developed Ground

..	.. / .. / ..	..	..		..
REV	DATE	DRAWN	DESCRIPTION		CHECKED

CLIENT				MADP	
SITE Former Bury Fire Station, The Rock, Bury, BL9 0					
DRAWING TITLE Site Habitat Baseline					
DRAWING REF (LAYOUT TAB) 304				SCALE@A2 1/250	
PROJECT REF 258				REV A	
SURVEYED	PH	DRAWN	PH		
CHECKED	PH	DATE	13/03/2026		





Notes

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KEY



Development footprint



Retained Tree Location



Retained h3h - Mixed Scrub



Retained q4 - Modified Grassland



Retained u1f - Sparsely Vegetated Land



u1b5 - Buildings



Retained u1b6 - Other Developed Ground

REV	DATE	DRAWN	DESCRIPTION	CHECKED	

CLIENT			
MADDP			
SITE			
Former Bury Fire Station, The Rock, Bury, BL9 0N.			
DRAWING TITLE			
BNG Development Plan			
DRAWING REF (LAYOUT TAB)			SCALE/A2
305			1/250
PROJECT REF			REV
135			B
SURVEYED	PH	DRAWN	PH
CHECKED		DATE	25/03/2026

