



BIODIVERSITY NET GAIN DESIGN STAGE REPORT

February 2026

Contents

Introduction	2
Survey Aims	2
Site Context.....	2
National Legislation and Policy Context	2
Biodiversity Net Gain	3
Method	4
Evidence of Competency and Experience	4
Area-based habitat baseline assessment	5
Strategic Significance	6
Post-intervention Assessment	6
Assessment Limitations.....	7
Results.....	8
Baseline Results	8
Post Development Results Area-Based Habitats	9
Summary of Metric Assessment Outcomes.....	10
Conclusion and Recommendations	10
References	11
Appendix A - Statutory Metric	12

Introduction

This report is written by Natalie Morris for Gary McDonald. A Biodiversity Net Gain (BNG) assessment was conducted on The Old Ambulance Station, Cemetery Road, to inform a planning application at this site.

Survey Aims

This report has been prepared to describe the results of a BNG assessment for the proposed planning application. The key objectives of this document are:

- Outline existing legislation and planning policy relevant to BNG;
- Determine the number of habitat baseline biodiversity units within the defined red line planning boundary;
- Identify the number of biodiversity units lost due to the planning application, and
- Where a 10% BNG cannot be delivered on-site, recommendations for off-site units will be provided.

Hedgerow and Watercourse BNG Units are not relevant to this BNG assessment and are not considered further.

Site Context

The site is located on Cemetery Road, Ramsbottom, BL0 9PU, GR SD 78465 15729, adjacent to Ramsbottom Cemetery. The site is surrounded by suburban houses and gardens to the west, with mature trees and open green-space to the east. The site includes a pre-1970s single-storey former ambulance station, with trees and shrubs, amenity grassland, and areas of hard landscaping.

National Legislation and Policy Context

The relevant primary legislation for BNG is the Environment Act 2021, defined in Chapter 30 of the Act (The Environment Act, 2021) which was created to ‘improve air and water quality, tackle waste, increase recycling, halt the decline of species, and improve our natural environment.’ In England, BNG is now mandatory under Schedule 7A of the Town and Country Planning Act 1990, as inserted by Schedule 14 of the Environment Act 2021.

There are six statutory instruments which became law alongside mandatory BNG. These work together to deliver the mandatory BNG framework:

- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations (2024)
- The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations (2024)
- The Biodiversity Gain Site Register 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)

Under the statutory framework for BNG, subject to some limited exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met (“the biodiversity gain condition”). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the on-site habitat. This increase can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits.

The biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development.

In England, National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government (MHCLG, 2024) sets out the government’s planning policies for England and how these are expected to be applied. Chapter 15 of the NPPF details policy principles with respect to conserving and enhancing the natural environment. Paragraph 187 states that planning decisions are required to contribute to and enhance the natural and local environment by ‘minimising impacts on and providing net gains for biodiversity’, and Paragraph 192 states that plans should, ‘identify and pursue opportunities for securing measurable net gains for biodiversity’.

To support the NPPF and application of the statutory framework for BNG, specific Planning Practice Guidance (MHCLG & DLUC, 2024) has been provided for BNG.

Biodiversity Net Gain

Biodiversity Net Gain is a policy specific to England which seeks to ensure development has a measurably positive impact (‘net gain’) on biodiversity, compared to what was there before development (The Environment Act, 2021). It seeks to contribute to the recovery of nature as part of a wider framework of policy actions.

The design and implementation of BNG is underpinned by ten BNG Good Practice Principles (CIEEM *et al.*, 2019) which are largely reflected in the statutory BNG framework. A key good practice principle within the application of the BNG approach is that a ‘measurable net gain contribution’ is made. The Defra Statutory Biodiversity Metric (DEFRA, 2024a) (herein referred to as ‘the Metric’) has been developed to provide a standardised approach for developments to quantify changes in biodiversity value as a result of development proposals.

The Metric uses habitat as a proxy for wider biodiversity and measures biodiversity value in ‘biodiversity units’. It can be used iteratively throughout all stages of a project, from site selection, preliminary design, detailed design, delivery, and operation. The earlier the Metric is applied, in accordance with the BNG Good Practice Principles and associated Metric rules and principles, the greater the opportunity to design for biodiversity and wider ecological benefits (DEFRA, 2024b).

The statutory BNG framework allows for biodiversity units to be delivered on the development site (i.e. within the proposed planning red line boundary) or off-site (i.e. outside the red line boundary), or as a combination of both. The Biodiversity Gain Hierarchy, as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015) (Ministry of Housing, Communities and Local Government, 2024), reflects a preference for on-site delivery over off-site delivery, although this should take into consideration the BNG Good Practice Principle of ‘achieving the best outcomes for biodiversity’.

The development of this document recognises the good practices, principles and approaches outlined in the following references:

- Chartered Institute of Ecology and Environmental Management (CIEEM), Construction Industry Research and Information Association (CIRIA), Institute of Environmental Management and Assessment (IEMA) (2016) Biodiversity Net Gain; Good practice principles for development.
- CIEEM, CIRIA, IEMA (2019) Biodiversity Net Gain. Good practice principles for development, a practical guide.
- DEFRA (2024b) Biodiversity Net Gain Collection. Available at: www.gov.uk/government/collections/biodiversity-net-gain [Accessed February 2026].

Method

Evidence of Competency and Experience

Authoring this report: Natalie Morris (Nee Woollacott) MCIEEM, attended the CIEEM Biodiversity Metric training (2023), has completed over 20 BNG metric assessments for development sites for a range of client.

Area-based habitat baseline assessment

The extent of the BNG assessment for the development is presented in Plate 1 below.

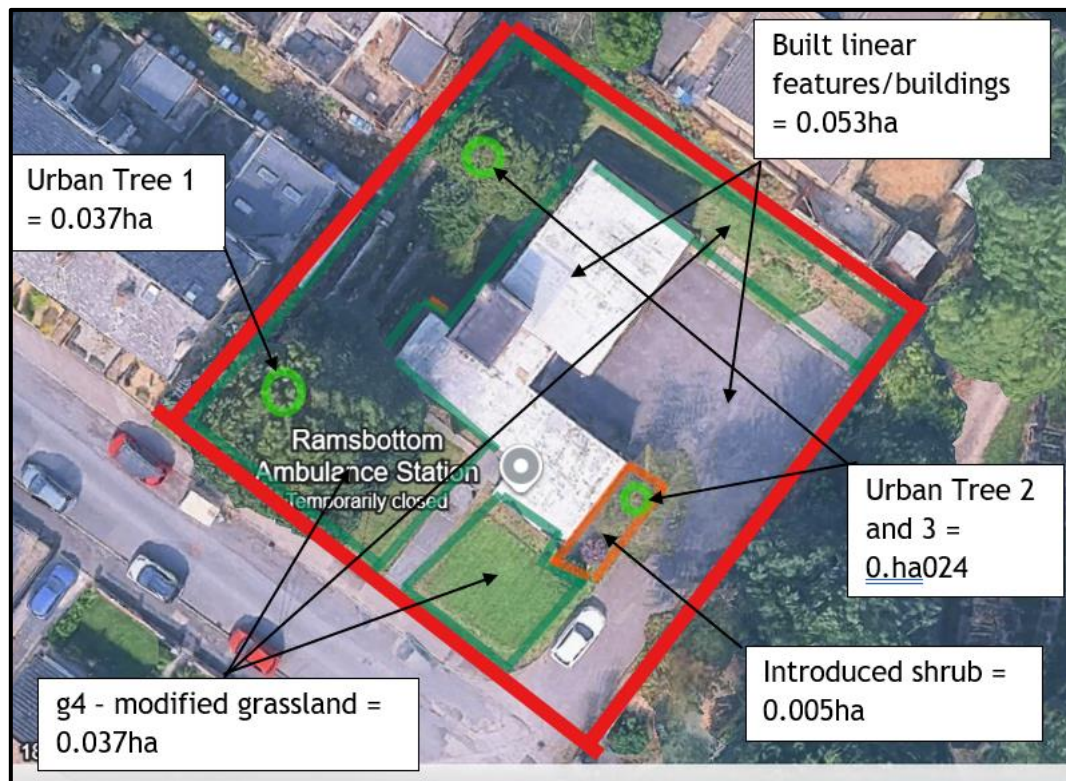


Plate 1 - UKHab baseline results with areas

A UKHab (UKHab Ltd. 2023) survey and Biodiversity Net Gain condition assessments (DEFRA 2023b) was conducted in August 2025 for all habitats located within the proposed red line boundary. Dominant and notable plant species were recorded, and relative abundance was expressed using the DAFOR scale: dominant, abundant, frequent, occasional, and rare. Botanical taxonomic nomenclature follows the New Flora of the British Isles (Stace, 2019). The condition of all habitats (Good, Moderate, Poor and N/A) recorded in the survey area have been assessed in line with the Defra Statutory Biodiversity Metric (DEFRA 2023b).

The following data was entered into the Statutory Metric calculator tool for area-based habitats:

- Habitat type and extent (ha) for area-based habitat, at which point each habitat is automatically assigned a distinctiveness rating (Very Low-Very High, 0-8);
- Habitat condition multiplier: poor (1), moderate (2), or good (3) (or an intermediate value where appropriate) based on condition criteria assessment; and,
- Strategic significance multiplier: based on proximity to local strategies and how ecologically desirable the habitat is (further information on how this has been assigned is provided below).

Strategic Significance

All area-based habitats must be assigned a strategic significance multiplier. This recognises habitats located within strategic locations for biodiversity (both for retention and enhancement, creation, and restoration) and gives extra value to them.

Strategic significance will ultimately be determined based on the information provided by the Local Nature Recovery Strategy (LNRS), a LNRS is currently published for Greater Manchester. For this assessment, as per the guidance (DEFRA, 2024b) all baseline data is of Low Strategic Significance and opportunities for BNG gains were in consideration of the published LNRS map with the appropriately appointed High Strategic Significance.

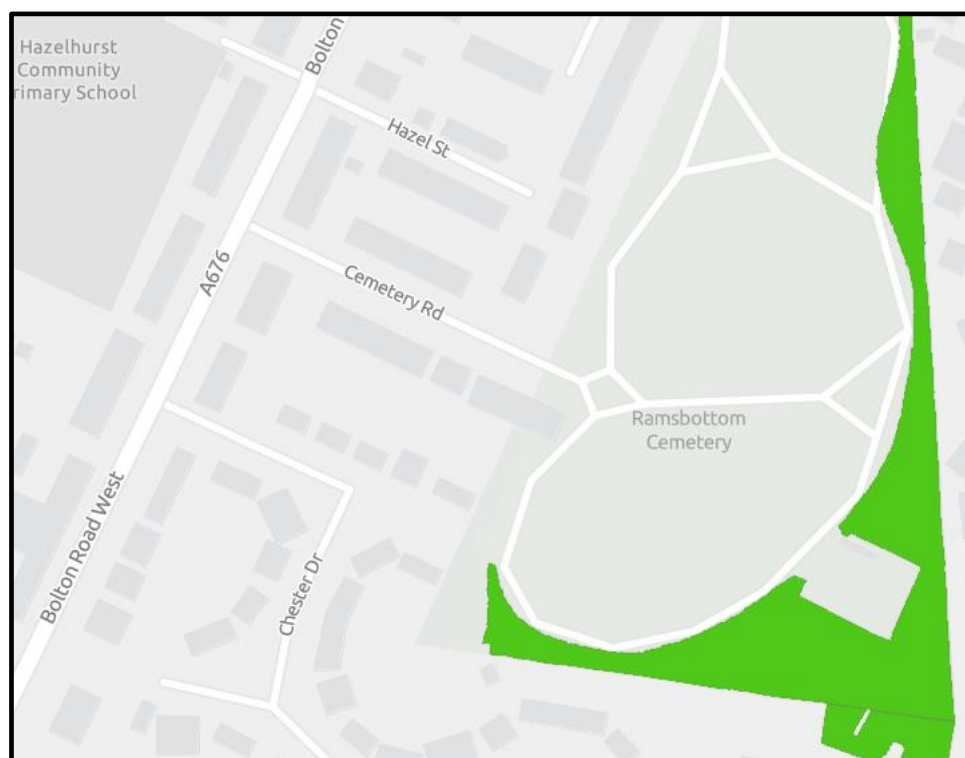


Plate 2: A map of the published LNRS for Greater Manchester, Light Green = BNG Opportunity Areas

Post-intervention Assessment

To create an on-site post-intervention unit score, similar habitat data is required to that input into the baseline tabs of the Metric calculation tool, with the addition of information relating to the timing of habitat creation proposed. This combination of data produces a total number of units for each habitat and subsequently quantifies total habitat units in the biodiversity post-intervention scenario.

Habitat types and condition scores for future habitats derive from the proposal, as shown in Plate 3. Professional judgement has been used to predict the Metric type and condition of habitat resulting from the proposed plan.



Plate 3 - Proposed residential buildings with vegetated gardens comprising 0.023ha

Assessment Limitations

It is noted that the Metric tool uses habitats as a proxy for biodiversity and is therefore a simplification of 'real world'. Furthermore, while the scoring of habitats is informed by ecological reasoning and the available evidence, the outputs of biodiversity unit calculations are not scientifically precise or absolute values. The Metric and its outputs should therefore be interpreted, alongside ecological expertise and common sense, as an element of the evidence that informs plans and decisions.

Results

Baseline Results

The full Metric tool is provided to accompany this report as Appendix A.

The habitats recorded on site are as follows:

- UKHab code: g4 - modified grassland (in moderate condition) - amenity grassland surrounding the former ambulance station, comprising Yorkshire fog (*Holcus lanatus*) (F), cock's-foot (*Dactylis glomerata*) (LD), perennial rye-grass (*Lolium perenne*) (F), creeping buttercup (*Ranunculus repens*) (O), fescue species (*Festuca* sp.) (O), common dandelion (*Taraxacum officinale* agg.) (R), daisy (*Bellis perennis*) (O) ribwort plantain (*Plantago lanceolata*) (O) and bramble (*Rubus fruticosus* agg.) (R).
- UKHab code: 847 - introduced shrub (condition data not applicable), comprising non-native ornamental species and holly (*Ilex aquifolium*) (R)
- UKHab code: Urban trees (in good condition) oak (*Quercus* sp.) (0.5 DBH -large), located at grid reference: SD 78448 15728
- UKHab code: Urban trees (in moderate condition) maple (*Acer* sp.) (40cm DBH - medium), located at grid reference: SD 78459 15744 and cherry (*Prunus* sp.) (22cm DBH - Small), located at grid reference: SD 78467 15722

Table 1 below comprises the area-based habitat baseline condition data.

Table 1 - Area-based habitat condition data

Habitat Type and Condition Criteria	
Modified Grassland	
"There are 6-8 vascular plant species per m ² present, including at least 2 forbs	Pass - 6 species per m2 including two forbs
Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed. "Any scrub present accounts for less than 20% of the total grassland area.	Fail - the area comprises regularly managed amenity grassland that is regularly cut
Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Pass - no physical damage evident
Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Fail - bare ground is absent
Cover of bracken (<i>Pteridium aquilinum</i>) is less than 20%.	Pass - no bracken present
	Pass - no invasive non-native species present

There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA4).		
Overall, 4/6 = Moderate Condition		
Individual Trees	Urban Tree 1	Urban Tree 2 and 3
The tree is a native species (or at least 70% within the block are native species).	Pass - native species	Pass - native species assumed
The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Pass - individual tree	Pass - individual tree
The tree is mature (or more than 50% within the block are mature).	Pass - mature tree	Fail - immature young trees
There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height. Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Pass - no evidence of adverse human impact	Pass - no evidence of adverse human impact
Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Fail - no evidence of ecological niches	Fail - no evidence of ecological niches
More than 20% of the tree canopy area is oversailing vegetation beneath.	Pass - vegetation beneath tree	Pass - vegetation beneath tree
Overall	5/6 = Good	4/6 = Moderate

Post Development Results Area-Based Habitats

The post-development area-based habitats have been calculated as having a value of 0.48 area-based units (comprising vegetated residential gardens). This is a net change of -0.31 units / -39.29%.

Summary of Metric Assessment Outcomes

The overall results of the Metric assessment are summarised in Plate 4 below, taken from the Metric calculation tool. The loss and reinstatement of habitats lead to a net loss of units for area based habitats. Due to the net loss in units, trading rules are also failed. See the Metric calculation tool (Appendix A) for further details.

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.31		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-39.29%		
	Hedgerow units	0.00%		
	Watercourse units	0.00%		
Trading rules satisfied?		No - Check Trading Summaries ▲		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	0.79	0.87	0.39
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Plate 4: A summary of the BNG final results

Conclusion and Recommendations

The proposed development represents a net loss of -0.31 habitat units with a deficit of 0.39 habitat units.

Following the potential construction of the residential buildings, the building residence will have ownership of the land, meaning that ongoing on-site management of habitats is not feasible. As a result, it is necessary to purchase the 0.39 habitat units (comprising medium and low distinctiveness habitat) from a local Biodiversity Bank to fulfil the mandatory 10% BNG requirement.

References

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Appendix A - Statutory Metric