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RED DOOR, BURY - BIODIVERSITY NET GAIN EXEMPTION

INTRODUCTION

Greengage Environmental Ltd (Greengage) was commissioned in June 2024 to undertake a site-based assessment to inform a Preliminary Ecological Appraisal (PEA), for the construction of a new Red Door Day Centre at Land adjacent to St Joseph's Presbytery, Bury, BL9 6AB, (hereafter referred to as 'the site').

The site comprises an existing church car park. The site is situated in a highly urbanised context, approximately 100m northwest of Bury town centre. Residential and commercial land use dominate the site surroundings.

The assessment was undertaken to determine the existing baseline habitat value, in relation to the mandatory Biodiversity Net Gain (BNG) requirement¹. The proposed development relates to the Full Planning Application for the creation of a new Red Door Day Centre. The proposed development consists of a single storey day centre with a kitchen and café for up to 30 visitors, activity space, meeting rooms, office and welfare facilities together with cycle parking and other associated works.

Since February 2024, unless exempt², all major planning applications are required to deliver a minimum 10% BNG. This was extended to include small sites on 2nd April 2024, in accordance with the Environment Act (2021) (Appendix B).

A BNG is required where a development 'impacts' a habitat to the extent that there is a decrease in biodiversity value, as measured within the Statutory Biodiversity Metric (SBM)¹.

One of the exemptions is a 'de-minimis' exemption, which applies to certain developments if the following two conditions are met:

- the development must not impact on any priority habitat; and
- if there is an impact on other onsite habitat, that impact must be on less than 25 square metres (sqm) (e.g. less than a 5m-by-5m square) of onsite habitat with a biodiversity



value greater than zero, and/or on less than 5 metres of onsite linear habitat (such as a hedgerow).

METHODOLOGY

A site walkover was undertaken as part of a Preliminary Ecological Appraisal (PEA) by Abbie Case, Senior Ecologist, of Greengage on the 07 June 2025 in accordance with guidance in the UK Habitat Classification System (UKHab)³ and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017)⁴ Guidelines for Preliminary Ecological Appraisal, in accordance with British Standard (BS) 42020: 2013: Biodiversity⁵.

OUTCOME

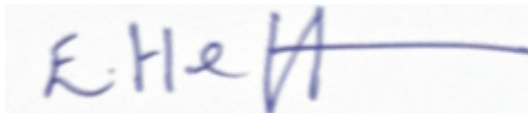
The site walkover identified only urban habitats within the site, with the site being recorded as u1b - Developed land; sealed surface.

The site walkover revealed that the site comprised entirely of a hardstanding, with no other habitats recorded. 'Hardstanding' is classed within the SBM as 'developed land; sealed surface', which delivers zero Biodiversity Units (BU). Therefore, the proposals will not have an impact upon baseline habitats. The proposals will not result in a decrease in biodiversity value.

No priority habitats are present within the site or within the immediate surroundings.

As per current legislation⁶, the proposed development will impact less than 25m² (5m x 5m) of on-site habitat, less than 5m of onsite linear habitat, and will not impact priority habitats, and is considered exempt from requiring a formal BNG assessment and exempt from the mandatory BNG condition.

Yours sincerely



Emer Heffernan
Consultant Ecologist

For and on behalf of Greengage Environmental Ltd

APPENDIX A SITE IMAGES

Plate 1 Existing church car park facing north west



Plate 2 Existing church car park facing north



APPENDIX B RELEVANT LEGISLATION AND POLICY

The BNG note has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environment Plan (DEFRA, 2018)⁷;
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011)⁸;
- National Planning Policy Framework (NPPF) (Ministry of Housing, Communities & Local Government (MHCLG), 2024)⁹;
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006)¹⁰;
- The Environment Act (DEFRA, 2021); and

The Environment Act, 2021

Under the Environment Act, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the LPA.

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

APPENDIX C REFERENCES

¹ Department for Environment Food and Rural Affairs (DEFRA) (2024) *The Statutory Biodiversity Metric User Guide*. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides#:~:text=The%20statutory%20biodiversity%20metric%20tool,the%20statutory%20biodiversity%20metric%20tool>

² *The Biodiversity Gain Requirements (Exemptions) Regulations 2024* [online]: *The Biodiversity Gain Requirements (Exemptions) Regulations 2024* (legislation.gov.uk)

³ UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>).

⁴ CIEEM (2017); *Guidelines for Preliminary Ecological Appraisal*, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

⁵ BSI (2013); *British Standard 42020:2013: Biodiversity — Code of practice for planning and development*, BSI Standards Publication

⁶ Defra (2023) *Biodiversity Net Gain: Exempt Developments* [online]: [Biodiversity net gain: exempt developments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/biodiversity-net-gain-exempt-developments)

⁷ DEFRA (2018). *UK Government's 25 Year Environment Plan*. Available at: assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf

⁸ DEFRA (2011). *Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services*. Available at: [pb13583-biodiversity-strategy-2020-111111.pdf](https://assets.publishing.service.gov.uk/media/50b65bb584297e/pb13583-biodiversity-strategy-2020-111111.pdf)

⁹ MHCLG (2024). *NPPF*. Available at: [National Planning Policy Framework](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/nppf-2024.pdf)

¹⁰ HMSO (2006). *NERC Act*. Available at: [Natural Environment and Rural Communities Act 2006](https://www.legislation.gov.uk/ukpga/2006/15/section/1)