



**New Yard Areas, Land at Eton Business Park, Eton Hill
Road, Radcliffe**

Biodiversity Net Gain Report

Document Control

Client:	Hamilton Heath Estates Ltd
Project Title:	New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe
Report Title:	Biodiversity Net Gain Report
Report Ref.:	P2582_02
Version:	V1
Status:	Final
Revision Comments:	Amended for revised site boundary.
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Issued to Client:	14 July 2024

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Contents

1. Summary.....	3
2. Introduction	4
Background	4
Relevant Documents	4
Site description	4
Development Proposals	4
Planning status of project, certainty of design and assumptions made	4
Aims, Objectives & Scope	4
Planning Policy and Legislation.....	5
3. Methodology	6
Personnel.....	6
Desk Study	6
Field Survey.....	6
UKHab & Condition Assessment Survey.....	6
Biodiversity Net Gain Metric Calculation	6
Classification and Measurement of Habitats	7
Limitations.....	9
4. Results	10
Baseline Habitats.....	10
Proposed Design	16
Biodiversity Metric Results	18
5. Conclusion	19
6. References.....	20
7. Figures	21
Appendix 1: Planning Policy & Legislation Summary	22
National Planning Policy Framework 2023	22
The Environment Act 2021	22
Appendix 2: Photographs.....	23

1. Summary

Table 1: Summary

Report Purpose	The objective of the present Biodiversity Net Gain (BNG) report is to provide an assessment as to whether the proposed development can deliver BNG or not for the design option(s) being considered.
Methodology	• A UKHab and condition assessment survey was carried out of the site on the 27th March 2024 with reference to best practice guidelines by a suitably qualified ecologist. • A biodiversity metric calculation was made, using the Statutory Biodiversity Metric.
Results & Conclusions	Following the guidelines for use of the statutory Biodiversity Metric, assessment has shown a net loss post-development. This equates to a deficit of 0.36 habitat units below the biodiversity net gain target of 10%. Trading rules were not satisfied. It is recommended that off-site habitat compensation options are explored, such as via habitat creation on other land also under the applicant's ownership, via a third-party habitat bank or via a financial contribution to be negotiated with the Local Planning Authority. Via the proposed scheme of hedgerow enhancement, assessment has shown that a biodiversity net gain in hedgerows can be delivered via the proposed development, subject to the implementation of a detailed plan for the management and creation of the proposed habitats. Trading rules for hedgerows were satisfied.

2. Introduction

Background

- 2.1. Elton Ecology Ltd was commissioned by Hamilton Heath Estates Ltd to conduct a Biodiversity Net Gain (BNG) Study of the site known as New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe.

Relevant Documents

- 2.2. The present assessment has been informed by the following documents:
- Proposed Layout SK04 Compound 02 (Contract No. 3614, Drawing No. 05) (CJ Partnership, December 2023).

Site description

- 2.3. The site comprises areas of developed land, grassland, and dense scrub, bordered by a treeline to the north. The site is located at Eton Business Park, Eton Hill Road, Radcliffe, M26 2ZS (Figure 1: Site Location Plan) (central OS grid reference: SD 79477 08550).

Development Proposals

- 2.4. The development proposals include the construction of a new industrial yard area with 17 new units.

Planning status of project, certainty of design and assumptions made

- 2.5. The present strategy has been prepared to support a planning application, based on the Proposed Layout SK04 Compound 02 (CJ Partnership, December 2023).
- 2.6. As stated in the 'Limitations' section, necessary assumptions have been made at this stage regarding the types and extents of habitats that will and can be created. It is accepted that re-submission of an updated BNG Report will typically be required with subsequent application(s), unless there are no significant changes to the original design proposed. This would include an updated BNG calculation using an appropriate metric to demonstrate how the net gain will be achieved.

Aims, Objectives & Scope

- 2.7. With reference to the Development Proposals and best practice BNG reporting guidelines (CIEEM, 2021), the objectives & scope of the present strategy are to provide:
- An assessment as to whether the project can feasibly deliver BNG or not for the options being considered;
 - Advice for the project to maximise its ability to deliver BNG considering factors such as location, design, construction methods and programme (where known/relevant);
 - If on-site BNG can't be achieved, consideration of the potential for off-site delivery of BNG, either securing land in close proximity to the project site or other alternatives, including more distant land under direct control or a brokered agreement; and
 - Where, following a review of the BNG Principles, the delivery of project-wide BNG as an outcome is not considered possible (e.g., as a result of impacts to

irreplaceable habitats or other site constraints), a record of the reasons and next steps towards delivering biodiversity gains elsewhere through the project.

Planning Policy and Legislation

- 2.8. A summary of biodiversity planning policies and wildlife legislation relevant to the site is provided in Appendix 1.
- 2.9. The Places for Everyone Joint Development Plan 2022 to 2039 have a mandatory no less than 10% BNG target set within their local planning policy.
- 2.10. The site is covered by Greater Manchester Biodiversity Action Plan.

3. Methodology

Personnel

- 3.1. The UKHab & condition assessment survey and BNG metric calculation was carried out by Consultant Ecologist PH BSc (Hons), MSc. PH holds a Natural England Level 1 Bat Licence (CL17) (reference number: 2021-54491-CLS-CLS) and a Natural England Level 1 Great Crested Newt Licence (CL08) (reference number: 2022-10461-CL08-GCN) and a botanical Field Identification Skills Certificate (FISC) Level 3. PH has attended formal training in UKHab survey, Biodiversity Net Gain, and botanical species identification. PH is a Qualifying member of CIEEM and is experienced in assisting and undertaking ecology surveys, GIS mapping, and report writing.
- 3.2. The UKHab & condition assessment survey was assisted by Assistant Ecologist CM BSc (Hons), MSc. CM has attended formal training in UKHab survey, Biodiversity Net Gain, and botanical species identification. CM is a Qualifying member of CIEEM and is experienced in assisting and undertaking ecology surveys, GIS mapping, and report writing.

Desk Study

- 3.3. A desk study was undertaken within the Preliminary Ecological Appraisal (Elton Ecology, 2024), which should be read in conjunction with this report. The proposed development is not assessed to impact any designated sites of nature conservation or irreplaceable habitats.

Field Survey

UKHab & Condition Assessment Survey

- 3.4. A UKHab and condition assessment survey was carried out of the site on 27th March 2024 with reference to best practice guidelines from UKHab Ltd (Butcher et al, 2023). The site was walked over, and the habitats present classified based on key indicator species present.
- 3.5. The condition assessment was carried out with reference to guidance within the Statutory Biodiversity Metric Condition Sheets and Technical Supplement (Defra, 2024). The condition of each habitat was assessed by scoring each habitat parcel against the criteria set out in the Statutory Biodiversity Metric Habitat Condition Assessment Sheets. A condition score was assigned to each habitat parcel based on a range of positive and negative indicators of quality against the optimum ecological state for the habitat, such as a grassland having species richness (positive) or the presence of invasive non-native plants (negative). This is used as an indicator for whether the habitat is a good or poor example of its habitat type/distinctiveness, and to inform future management for ecological enhancement where applicable.

Biodiversity Net Gain Metric Calculation

- 3.6. The prevailing biodiversity metric calculation spreadsheet at the time of writing was used, the Statutory Biodiversity Metric, with reference to the Technical Supplement and User Guide (Natural England, 2024).
- 3.7. The Statutory Biodiversity Metric calculates the biodiversity units present as follows:

Baseline Habitats:

Size of Habitat Parcel x Distinctiveness x Condition x Strategic Significance = Baseline Biodiversity Units

Post-intervention Habitats are calculated as above, and then:

$\text{x Difficulty} \times \text{Time to Target Condition} \times \text{Spatial Risk} = \text{Post-intervention Biodiversity Units}$

The net gain or loss in Biodiversity Units is then calculated as:

Post-intervention units – Baseline units = (+/-) Net Change

- 3.8. As the basis of the calculations, the Statutory Biodiversity Metric requires the user to enter a series of variables for each baseline, enhanced or created habitat parcel. These variables and decisions made are summarised in the sections below and presented in the results section. No river habitats were present at the site, and as such variables relating only to river habitats have not been included.

Classification and Measurement of Habitats

- 3.9. The UK Habitat Classification System (UKHab) (UKHab Ltd, 2023) was used during field surveys and converted to the appropriate habitat classification via the Statutory Metric guidance (Defra, 2024), to complete the broad habitat and habitat type variables of the Statutory Metric calculator.
- 3.10. The habitat areas were mapped via the QGIS geographic information system application using a geo-referenced and ground-checked satellite image of the site.
- 3.11. Post-development habitat areas were measured from the illustrative Proposed Site Plans, georeferenced into QGIS.
- 3.12. Following the Statutory Biodiversity Metric QGIS Template and Import Tool User Guide (Natural England Joint Publication JP039), each habitat parcel was entered into the QGIS Template where the data was exported into the Import Tool to consolidate the data to be entered into the Statutory Metric calculator.

Strategic Significance

- 3.13. This is a score assigned to baseline and proposed habitats based on whether the habitat is significant for nature based on its location and habitat type. An assessment of this variable requires consideration as to whether the site is located within the relevant biodiversity local strategy, plan or policy, designated sites for nature conservation, and the sites position within the landscape.
- 3.14. With reference to the Department of Environment, Food & Rural Affairs (DEFRA) Policy paper 'Local Nature Recovery Strategies', there are 48 local nature recovery strategy areas covering England¹. The relevant strategy area for the site is Greater Manchester and the relevant responsible body is Greater Manchester Combined Authority².
- 3.15. If no LNRS is available for the local authority area applicable to the site, other relevant documents and criteria are used which can include local published plans, strategies or policies, as listed within the Statutory Biodiversity Metric User Guide Paragraph 5.4.4 and any other relevant documents. If the geographic location or type of habitat present is listed within the other relevant documents, a score of high is assigned to the given habitat area. These include:

- Statutory Designated Sites

¹ <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1166611/Map_of_local_nature_recovery_strategy_areas_and_responsible_authorities.pdf

- Non-Statutory Designated Sites
- National BAP Priority Habitats
- Local Plan
- Neighbourhood Plan
- Area of Outstanding Natural Beauty Management Plan
- Local Biodiversity Action Plan
- Species and protected sites conservation strategies
- Green Infrastructure / Tree / Woodland Strategies
- River Basin Management Plans
- Catchment Plans and Catchment Planning Systems
- Habitats Supporting Populations of Notable/ Priority and/or Protected Species
- Biodiversity Opportunity Map (BOM)

3.16. Where there are no relevant documents, professional judgement was used to assign a strategic significance score of either 'medium' or 'low'. If a habitat location or type is not listed within a relevant document and there is a lack of evidence to support a professional judgement of 'medium' strategic significance, a score of 'low' is assigned.

3.17. The relevant planning policy documents are:

- Places for Everyone Joint Development Plan 2022 to 2039

3.18. The site is not included within the planning policies as a nature conservation priority.

3.19. As detailed in the Places for Everyone Joint Development Plan 2022 to 2039, the relevant Local Biodiversity Action Plan for the site is the Greater Manchester Biodiversity Action Plan.

Bespoke Compensation Agreed for Unacceptable Losses

3.20. This is a yes/no decision cell to indicate whether bespoke compensation has been agreed with decision makers for any losses in very high distinctiveness habitats.

Temporal Multiplier

3.21. Within the temporal multiplier for each created/ enhanced habitat parcel the metric requires the user to enter the following variables:

- Habitat created in advance/ years: The Statutory Metric rewards habitat creation in advance of losses by reducing the temporal risk multipliers added.
- Delay in starting habitat creation/ years. If there will be a significant delay in the creation of a habitat type relative to any losses (e.g. phased development), the number of full years that the creation will be delayed is entered. The Statutory Metric then adds the number of years to the pre-populated time to target condition, which increases the effect of the risk multiplier.

Limitations

- 3.22. The accuracy of habitat area measurement is limited by the methods by which the baseline data was collected and resolution of development proposal plans. In this instance, baseline habitat areas have been calculated by cross referencing illustrative habitat plans mapped in the field with georeferenced aerial imagery. Post-development habitat areas were measured from the concept landscape plans, georeferenced into QGIS.
- 3.23. Reasonable assumptions have been made with regards to the type/condition of habitats that could be created, which would need to be informed by a detailed Landscape Ecological Management & Monitoring Plan.
- 3.24. The Statutory Biodiversity Metric uses habitats as a proxy for biodiversity, which is a simplification of the real world. Although informed by evidence and reasoning, the outputs of the Metric are not scientifically precise or absolute values. The generated biodiversity unit scores are a proxy for the relative biodiversity worth of a habitat or site. The metric and its outputs must be interpreted with ecological expertise and a common-sense approach. The metric is an aid to biodiversity decisions.
- 3.25. All dimensions and distances provided are approximate.
- 3.26. The present study has been informed by the Proposed Layout SK04 Compound 02 (CJ Partnership, December 2023), and as such assumptions have been made regarding the final planned design including the precise extent of proposed hard and soft landscaping and property boundaries.

4. Results

Baseline Habitats

- 4.1. The baseline habitats and condition assessments at the site including the data entered into the Biodiversity Metric are given in the following tables and mapped on Figure 2.1: Baseline Habitat Plan. The baseline habitat condition scores and post-development retentions are shown in Figures 2.2 and 2.3. The 'consolidated' data is provided in the present report. Non-consolidated data is provided within the completed Biodiversity Metric. Photographs of the habitats referred to are presented in Appendix 2: Photographs.
- 4.2. No watercourses were present within the baseline habitats.

Table 2: Site Habitat Baseline Areas

UKHab Habitat Code	UKHab Habitat Classification	Data Entered into Metric					Description	Photograph Ref No. (Appendix 2: Photographs)
		Metric Reference No.	Area (hectares)	Condition	Strategic Significance	Habitat retained/enhanced/lost		
g4	Modified grassland	1	0.0951	Poor	Area/compensation not in local strategy/ no local strategy	Lost	An area of modified grassland was present in the centre of the site and included abundant annual meadow grass <i>Poa annua</i> , with frequent cock’s foot <i>Dactylis glomerata</i> , bramble <i>Rubus fruticosus</i> , butterfly bush <i>Buddleja sp.</i> , moss, and dogwood <i>Cornus sanguinea</i> , occasional colt's foot <i>Tussilago farfara</i> , spear thistle <i>Cirsium vulgare</i> , broadleaved dock <i>Rumex obtusifolius</i> , ribwort plantain <i>Plantago lanceolata</i> , common nettle <i>Urtica dioica</i> , fescue <i>Festuca sp.</i> , Yorkshire fog <i>Holcus lanatus</i> , and soft rush <i>Juncus effusus</i> , and rarely present vetch <i>Vicia sp.</i> , and ragwort <i>Senecio jacobaea</i> .	1
h3d	Bramble scrub	2	0.0108	Condition Assessment N/A		Lost	An area of dense bramble scrub was present to the east of the modified grassland.	2
h3j	Willow scrub	3	0.0157	Poor		Lost	An area of willow scrub dominated by crack willow <i>Salix fragilis</i> with mature and self-set trees and rarely present ash <i>Fraxinus excelsior</i> was present in the west of the site. The ground flora comprised 80% bare ground cover with occasional common nettle. Japanese knotweed <i>Reynoutria japonica</i> , a Schedule 9 INNS was frequent throughout the habitat.	3
u1c	Artificial unvegetated, unsealed surface	4	0.012	N/A - Other		Lost	The western half of the site primarily comprised an area of gravel surfacing.	4
u1b	Developed land; sealed surface	5	0.2897	N/A - Other		0.2897 Retained	Two prefabricated buildings, an area of artificial grass, and an area of hardstanding was present on site.	5
Urban	Introduced shrub	6	0.0292	N/A		0.0158 Retained	Area of managed shrubs at carpark edge	

Table 3: Condition Assessment – Low Distinctiveness Grassland (Adapted from Natural England, 2024)

Condition Assessment Criteria		Grassland north of recently cleared woodland	
		Condition Achieved (Y/N)	Notes/Justification
1	"There must be 6-8 species per m². If a grassland has 9 or more species per m² it should be classified as a medium distinctiveness grassland habitat type. NB - this criterion is essential for achieving moderate condition."	N	Low species density
2	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 insects, birds and small mammals to live and breed.	Y	Sward height is varied
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	N	Scattered scrub is present across most of land parcel
4	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.	Y	Damage is less than 5%
5	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Y	Bare ground cover is less than 10%.
6	Cover of bracken less than 20%.	Y	No bracken present
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Y	No INNS present within the grassland.
Essential criterion 1 achieved (Y/N)		N	
Number of criteria passed		5	
Condition Assessment Result	Condition Assessment Score	Score Achieved x/✓	
Passes 6 or 7 of 7 criteria including passing essential criterion 1	Good (3)		
Passes 4 or 5 of 7 criteria including passing essential criterion 1	Moderate (2)		
Passes 0, 1, 2 or 3 of 7 criteria; OR 4, 5 or 6 of criteria but failing criterion 1	Poor (1)	✓	

Table 4: Condition Assessment – Dense Scrub (Adapted from Defra, 2024)

Condition Sheet:			
Condition Assessment Criteria		Willow scrub	
		Condition Achieved (Y/N)	Notes/Justification
1	Vegetation matches the UKHab description when in natural range: At least 80% of scrub comprises native species At least 3 native woody species are present No single species covers more than 75% of the habitat, with exceptions.	N	Dominated by crack willow
2	“Seedlings, saplings, young shrubs and mature (or ancient and veteran) shrubs are all present.”	Y	Variety of aged shrubs present.
3	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	N	Japanese knotweed present throughout
4	Well-developed edge with scattered scrub and tall grassland or forbs is present between the scrub and the adjacent habitat.	N	No well-developed edge present.
5	Glades, clearings or rides are present within the scrub.	Y	Clearings present
Number of criteria passed:		2	
Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓	
Passes 5 criteria	Good (3)		
Passes 3 or 4 criteria	Moderate (2)		
Passes 2 or fewer criteria	Poor (1)	✓	

Table 5: Site Hedge Baseline

UKHab Code	Hedgerow Type	Data Entered into Metric					Description	Photograph Ref No. (Appendix 2: Photographs)
		Hedgerow number	Length (km)	Condition	Strategic Significance	Hedgerow retained/enhanced/lost		
w with secondary code 33	Line of trees	TL1	0.05	Moderate	Location ecologically desirable but not in local strategy	Enhanced	A line of trees was present along the north site boundary and included frequent sycamore <i>Acer pseudoplatanus</i> and ash, with occasional hawthorn <i>Crataegus monogyna</i> , and rarely present crack willow.	

Table 6: Condition Assessment – Line of trees (Adapted from Natural England, 2023)

Condition Sheet: LINE OF TREES Habitat Type		
Condition Assessment Criteria		Condition Achieved (Y/N)
		TL1
1	More than 70% of trees are native species.	Y
2	Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.	N
3	One or more trees has veteran features and or natural ecological niches for vertebrates and invertebrates, such as presence of standing and attached deadwood, cavities, ivy or loose bark.	Y – crack willow with cavities present
4	There is an undisturbed naturally vegetated strip of at least 6 m on both sides to protect the line of trees from farming and other anthropogenic operations.	N – horse grazed pasture to north, industrial site to south.
5	At least 95% of the trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	Y
Number of Criteria Passed		3
Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
Passes 5 of 5 criteria	Good (3)	
Passes 3 or 4 of 5 criteria	Moderate (2)	✓
Passes 0, 1 or 2 of 5 criteria	Poor (1)	

Proposed Design

- 4.3. The development proposals include the construction of new industrial units with associated hard landscaping.
- 4.4. The proposed 'consolidated' values for post-development created habitats and hedgerows at the site entered into the Biodiversity Metric are given in the following Tables and mapped on Figure 3.1: Proposed Habitats Plan. The target conditions for the habitats are shown in Figure 3.2: Proposed Habitat Target Condition Plan. For unconsolidated data please see the completed Biodiversity Metric.

Table 7: On-site Habitat Creation

Data Entered into Metric						
Broad Habitat	Proposed Habitat	Area (hectares)	Condition	Strategic Significance	Habitat created in advance/years	Delay in starting habitat creation/years
Urban	Developed land; sealed surface	0.147	N/A - other	Area/compensation not in local strategy/ no local strategy	0	0

Table 8: On-site Hedgerow Creation

Data Entered into Metric					
Proposed Habitat	Length (km)	Condition	Strategic Significance	Habitat created in advance/years	Delay in starting habitat creation/years
Species rich native hedgerow with trees	0.05	Moderate	Formally identified in local strategy	0	0

Biodiversity Metric Results

- 4.5. The completed biodiversity metric excel spreadsheet has been issued with the present report and should be read in conjunction with it. The 'headline results' output of the Biodiversity Metric calculation are presented in Table 9 below.

Table 9: Summary of Biodiversity Metric Output

	Habitat/Hedgerow	Unit
On-site Baseline Units	Habitat	0.35
	Hedgerow	0.22
On-Site Post-Intervention Units	Habitat	0.00
	Hedgerow	0.52
Total Net Unit Change	Habitat	-0.32
	Hedgerow	0.29
On-site net % change	Habitat	-91.09%%
	Hedgerow	+130.42%
Trading rules satisfied?		No

5. Conclusion

- 5.1. Following the guidelines for use of the statutory Biodiversity Metric, assessment has shown a net loss post-development. This equates to a deficit of 0.36 habitat units below the biodiversity net gain target of 10%. Trading rules were not satisfied.
- 5.2. It is recommended that off-site habitat compensation options are explored, such as via habitat creation on other land also under the applicant's ownership, via a third-party habitat bank or via a financial contribution to be negotiated with the Local Planning Authority.
- 5.3. Via the proposed scheme of hedgerow enhancement, assessment has shown that a biodiversity net gain in hedgerows can be delivered via the proposed development, subject to the implementation of a detailed plan for the management and creation of the proposed habitats. Trading rules for hedgerows were satisfied.

6. References

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7. Figures

Figure 1: Site Location Plan (Overleaf)

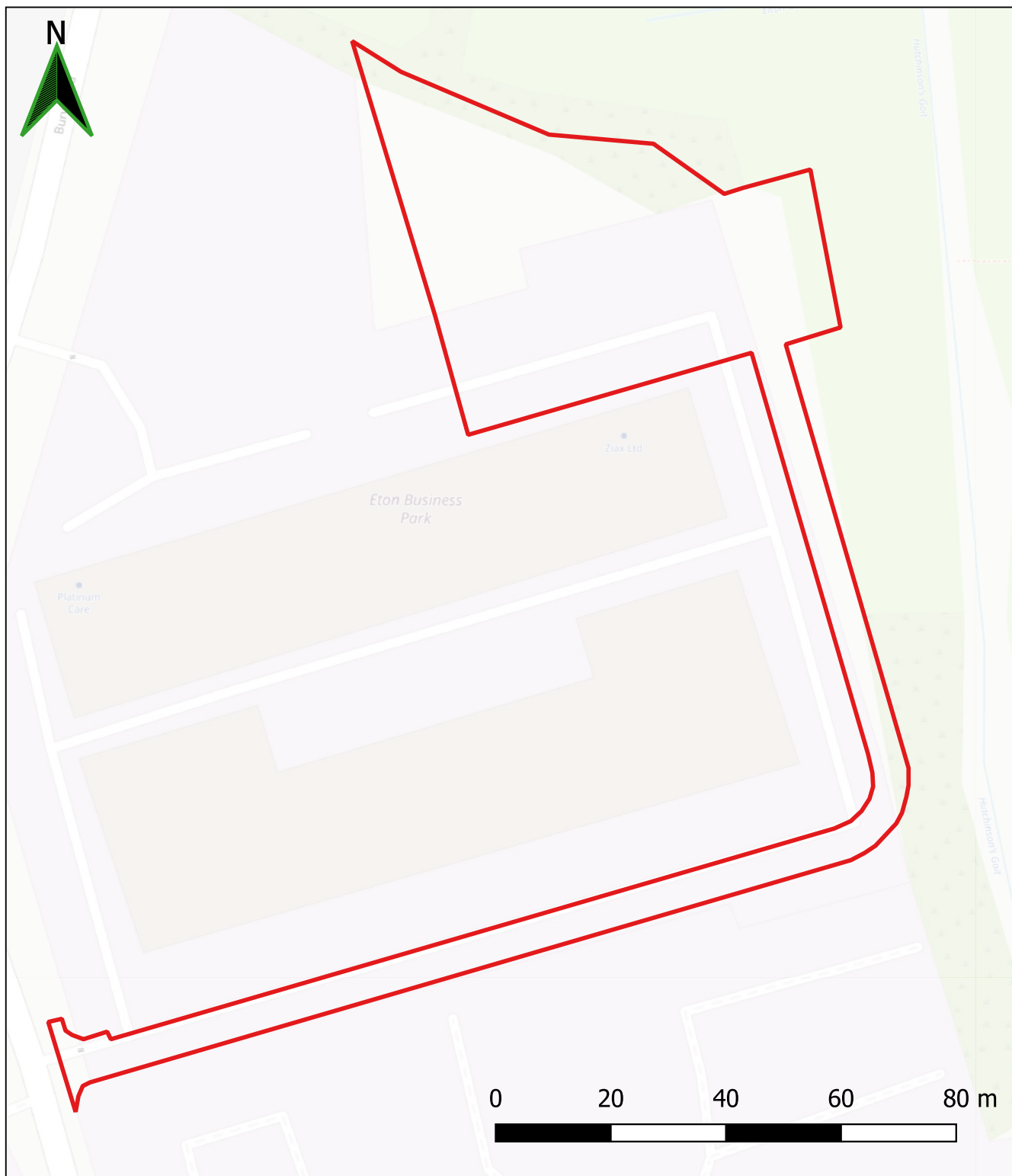
Figure 2.1: Baseline Habitat Plan (Overleaf)

Figure 2.2: Baseline Habitat Condition Plan (Overleaf)

Figure 2.3: Baseline Habitat Retention Plan (Overleaf)

Figure 3.1: Proposed Habitat Plan (Overleaf)

Figure 3.2: Proposed Habitat Condition Plan (Overleaf)



Legend

 Site boundary

Project:

New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe

Drawing:

Figure 1: Site Location Plan

Date: 14-07-2024

Version: FINAL

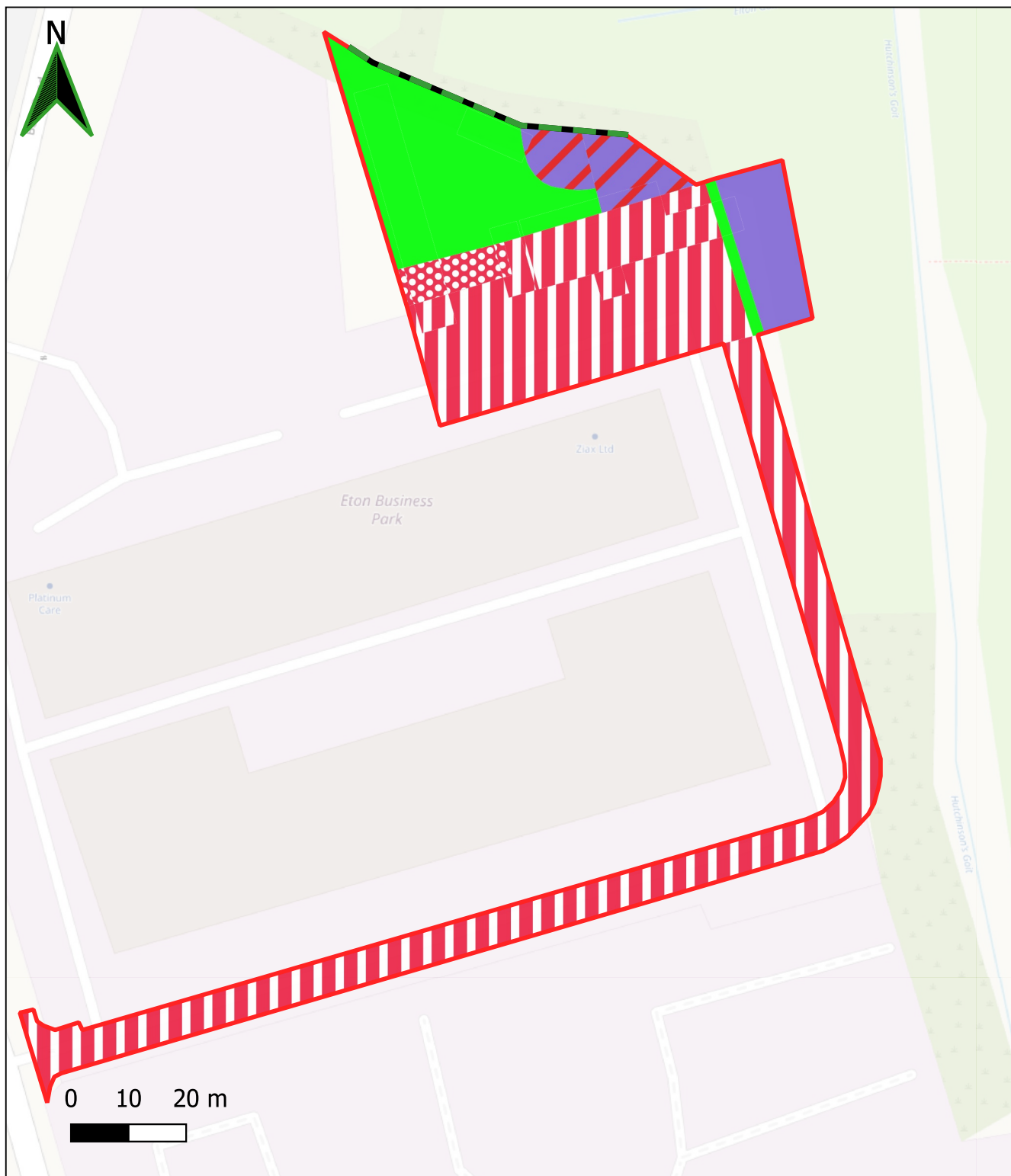
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Job No: P2582



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Legend

-  Site Boundary
-  Line of trees
-  Artificial unvegetated, unsealed surface
-  Bramble scrub
-  Developed land; sealed surface
-  Introduced shrub
-  Modified grassland
-  Willow scrub

Project:

New Yard Areas, Land at Eton Business Park

Drawing:

Figure 2.1: Baseline Habitat Plan

Date: 14-07-2024

Version: FINAL

Author: TE

Drawing No: P2585_01_2.1



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Legend

 Site Boundary

Baseline Hedgerow Condition

 Moderate

Baseline Habitat Condition

 Poor

 N/A - Other

 Condition Assessment N/A

Project:

New Yard Areas, Land at Eton Business Park

Drawing:

Figure 2.2: Baseline Habitat Condition Plan

Date: 14-07-2024

Version: FINAL

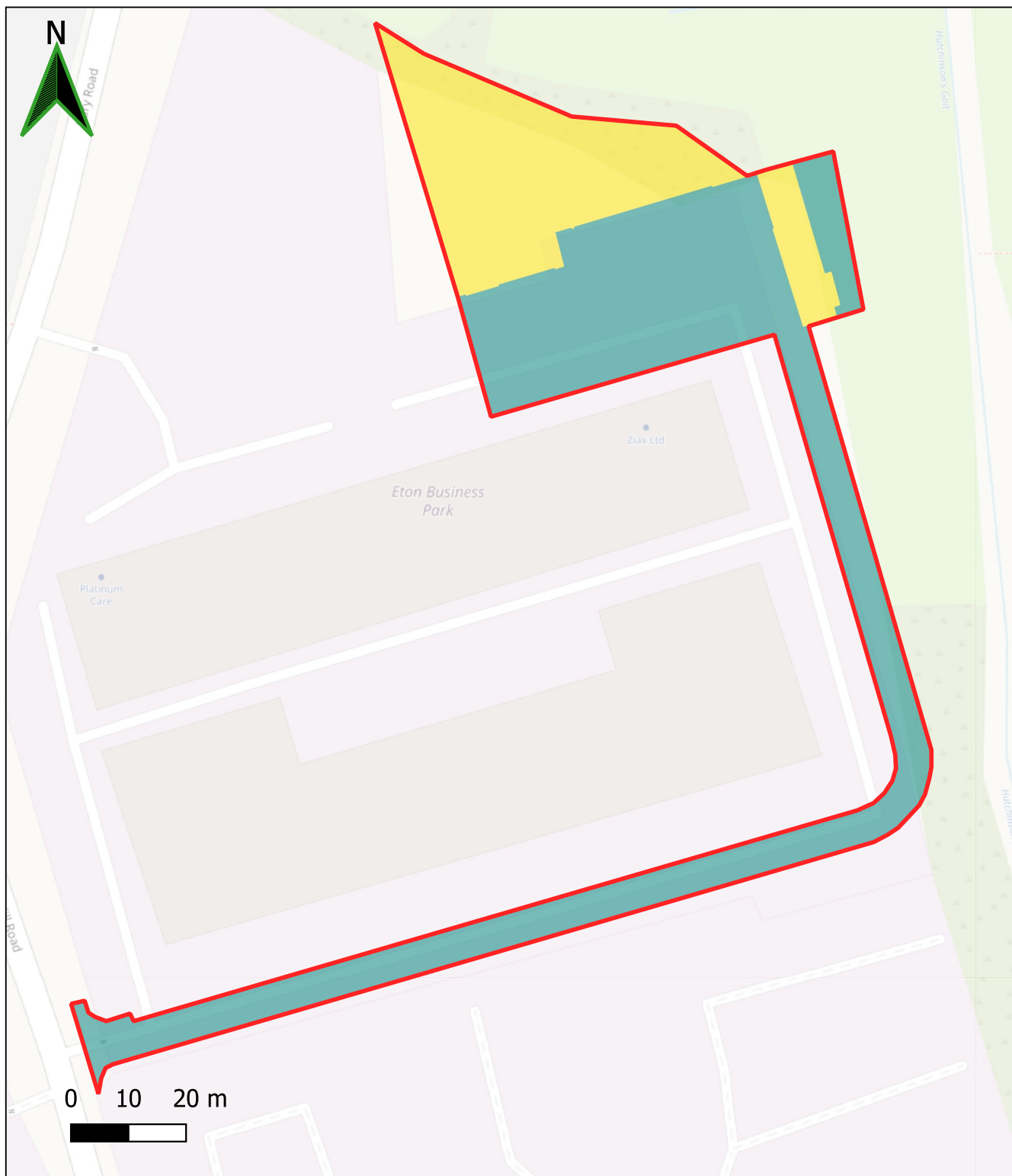
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Legend

 Site Boundary

Habitats Retention

 Retained

 Lost

Project:

New Yard Areas, Land at Eton Business Park

Drawing:

Figure 2.3: Baseline Habitat Retention Plan

Date: 14-07-2024

Version: FINAL

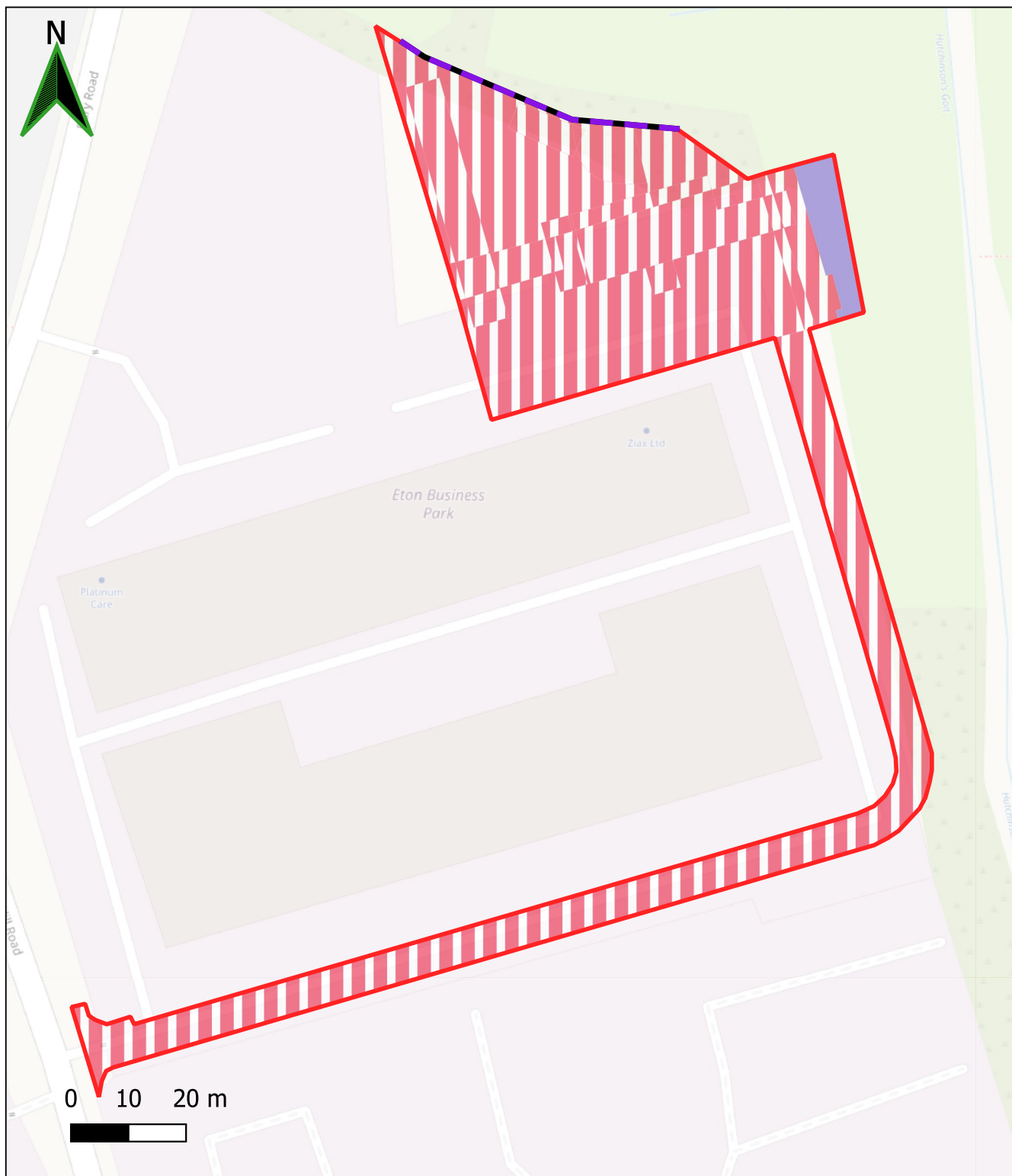
Author: TE

Drawing No: P2585_01_2.3



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Legend

 Site Boundary

Hedgerows Proposed

 Species-rich native hedgerow with trees

Habitats Proposed

 Developed land; sealed surface

 Introduced shrub

Project:

New Yard Areas, Land at Eton Business Park

Drawing:

Figure 3.1: Proposed Habitat Plan

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Drawing No: P2582_01_3.1



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Legend

 Site Boundary

Proposed Hedgerow Condition

 Moderate

Proposed Habitats Condition

 N/A - Other

Project:

New Yard Areas, Land at Eton Business Park

Drawing:

Figure 3.2: Proposed Habitat Condition Plan

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Appendix 1: Planning Policy & Legislation Summary

This appendix serves as a summary of relevant policy and legislation. It is not intended to supersede the policy or legislation documents to which it refers, and the relevant full documents should always be consulted prior to decision making.

National Planning Policy Framework 2023

Biodiversity is a material consideration under the National Planning Policy Framework (2021). Relevant text to biodiversity from the NPPF is described below.

“174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

[...]

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;”

“179. To protect and enhance biodiversity and geodiversity, plans should:

[...]

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. “

“180. When determining planning applications, local planning authorities should apply the following principles:

[...]

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

The Environment Act 2021

Schedule 14 makes provision for biodiversity gain to be a condition of planning permission in England. The biodiversity net gain relevant percentage is currently set to 10% by the Act.

Appendix 2: Photographs



Photo 1: Modified grassland on site.



Photo 2: Dense bramble scrub.



Photo 3: Dense willow scrub.



Photo 4: Area of gravel surfacing.



Photo 5: Building with artificial grass.



Photo 6: Line of trees at north boundary.