

**Extended Preliminary Ecological Assessment
and
Statement on Biodiversity Net Gain
and Biodiversity Gain Plan and
Condition Assessments
(accompanies a Statutory Biodiversity Metric Calculation
Tool)
for a vacant plot at 207-209 Bury Old Road
Heaton Park
Prestwich
Bury District
Greater Manchester**

By

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1 INTRODUCTION

- 1.1 A vacant plot of previously developed land at 207-209 Bury Old Road, Heaton Park, Prestwich, (size 646 square metres) Bury District (SD 8242 0371) and an adjacent gravel garden plot on Infant Street (SD 8240 0371) were surveyed together to the CIEEM Guidelines for Preliminary Ecological Appraisals Second Edition 2017 and for Biodiversity Net Gain (BNG) by Dave Bentley Entomology and Ecology Services on 4th July 2024. A PEA asks questions and the Extended PEA answers the questions. This report was rewritten on 21/2/2025 and there have been no on the ground changes since the original survey, as confirmed by an additional visit by the ecologist 21/2/2025. This is primarily a lawned over demolition site as can be seen from Ordnance Survey maps held by the National Library of Scotland and has most likely been developed since Prestwich's earliest times. The application is to build a block of 7 flats and car parking spaces. In this report and the Metric all crucial measurements are provided by the architect.
- 1.2 BNG User Guide: "Interpreting biodiversity metric tool outputs. The biodiversity metric compares the relative biodiversity worth of a site pre-intervention and post-intervention. The quality and reliability of outputs will depend on the quality of the inputs. You should use the biodiversity metric and its outputs along with ecological expertise to provide the evidence to inform plans and decisions." In other words one should not be a slave to the metric, as it is our servant. Some passages from The Statutory Biodiversity Metric User Guide July '24 are included at the end. These are the BNG metric calculations from the 21/02/2025 Metric completion:

On-site baseline	0.38 Habitat Units
On-site post intervention	0.13 Habitat Units
On-site net change	-0.25 Habitat Units or -64.74 % net change
Deficit	0.29 Habitats Units (the important figure)

The applicant will need to purchase 0.29 Habitat Units from a Habitat Bank

Here is what is being developed upon (646 square metres):

- 1.3 The site within the red line measures **646 square metres** in total and consists of a lawn area on Bury Old Road between shops (473 square metres), and an unused communal gravel garden (127 square metres) which is only accessible from the car park of the block of flats at the south end of Infant Street. A section of pavement and roadway of Infant Street is also in the red line area (46 square metres).
- 1.4 The lawn is NOT g4 Modified grassland as it is deliberately created on a demolition site and managed as a lawn and has not been "modified" from natural g1 Acid grassland, g2 Calcareous grassland or g3 Neutral grassland. It is actually, with the rest of the application, u1d Suburban mosaic of developed and natural surface. "Definition: small scale mosaic of developed and natural surface as in housing and gardens in suburban areas." The lawn is not a "827 garden" per UKHab as it not within the curtilage of housing so remains unclassifiable as this level. UK Hab page v states "Habitat Origin is critical information about certain habitat types, relating to their historical origin or formation and is particularly important for those habitats that can be substantially altered or created by humans..." The lawn is regularly mown and the boundaries and central tree base are sprayed with herbicide, a seen during the survey. HOWEVER, notwithstanding the above, the GMEU will likely require it be labelled as g4 Modified grassland.

- 1.5 On the west boundary of the lawn is an area of mossy and bare soil 60cm wide at the fence base kept clear by regular herbiciding = 9 square metres. 829 unvegetated garden is best fit!
- 1.6 On the north boundary between the grassed area and Number 211 is a strip of paving 60cm wide = 4.812 square metres; u1b developed land; sealed surface.
- 1.7 On the north boundary of the grassed area from the above end to the paving in the west to the gravel garden fence in the east is an elongate triangular area of tall herb and Sycamore saplings in summer and leaf mould in winter. This area is c33.89 square metres. Google Streetview from 2009 shows a small tree in this area but only a small loose stump exists today. The strip appears controlled by herbicide but is no longer lawn. This is 81 ruderal or ephemeral / tall forb (u1f). There is one BNG Condition Assessment available for both types and a failure of BNG to match with UKhab.
- 1.8 On the main road half the concrete base of a public bench on Bury Old Road juts into the grassed area, and concrete bases from an earlier bench is also there jutting into the grassed area = 1.9494 square metre; u1b developed land; sealed surface.
- 1.9 There are three plastic bollards sited in the grassed are (a 4th is outside the red line) each with radius of 8.5cm totalling = 0.068094 square metres.
- 1.10 Thus taking into account the above the grassed area of the managed lawn (the red line area does not include an access strip adjacent number 205) = 423.2805 square metres; g4 modified grassland.
- 1.11 There is a circular derelict flower bed in the gravel garden = 3.88 square metres; 846 flower bed.
- 1.12 The rest of the gravel garden is crushed stone over a membrane, over a cleared urban site, likely a concrete/flagged/rubble surface = 123.12 square metres; U1b6 other developed land.
- 1.13 The paving area and section of Infant Street to be remade for access = 46 square metres; u1b developed land; sealed surface.
- 1.14 The lawn area has a single large Silver Birch and there are some weed Sycamores growing through the palisade fence from the industrial yard to the north.

Here is what is being created (646 square metres):

- | | | |
|------|-------------------------------|-------------------|
| 1.15 | Building with flats | 184 square metres |
| | Yard + carports | 204 square metres |
| | Drive | 129 square metres |
| | Infant Street roadway | 46 square metres |
| | Entrance paving | 7 square metres |
| | Extra bin space | 2 square metres |
| | Garden with 9 trees | 37 square metres |
| | Laurel hedge S and SE | 19 square metres |
| | Shrubbery landscaping N and E | 18 square metres |

- 1.16 The site has no Priority Habitat or Irreplaceable Habitats, and no Protected or Priority Species. It is not a Site of Biological Importance, is not in a Wildlife Corridor, and Bury Council's Feature of Ecological Value policy does not apply.
- 1.17 David Bentley conducted the survey. He has been in conservation since 1983 and has been a professional ecologist since 1993.
- 1.18 The CIEEM Guidelines are explicit in what is required to be assessed and provided:
- * A Habitat Survey Map.
 - * A desk study. In this case the NBN Atlas and iRecord were consulted.
 - * An assessment of the possible presence and likely importance of the following:
 - Plants
 - Fungi
 - Terrestrial and aquatic invertebrates
 - Fish (where relevant, based on an assessment of any watercourses and water bodies present);
 - Amphibians (including both breeding and terrestrial habitat)
 - Reptiles
 - Breeding, wintering and migratory birds
 - Bats (including potential roost sites, and foraging and commuting habitats/features)
 - Other protected or priority mammal species, as relevant.
 - * Mapping of any stands of non-native invasive plant species
 - * Recording of any incidental sightings of priority or protected species, or field signs of such species.
 - * Box 1 of the PEA Guidelines discusses Protected and Priority Species information and this is stated to include Protected and Section 41 Priority Species and Priority Habitats and also Red Data listed taxa and indeed Nationally Scarce taxa, as well as Birds of Conservation Concern Red (most declining) and Amber listed taxa. The JNCC Taxon List names the plethora of higher plants, bryophytes, fungi and wild animals, including invertebrates that are considered scarce.
 - * BNG requires we consider the impact of the development on nearby Priority Habitats.

2 METHODS

- 2.1 The survey morning was on 4th July 2024. The site was accessed from both Bury Old Road and from Infant Street. All PPE was cleaned beforehand to meet biosecurity needs. Revisited 21/2/2025.

- 2.2 It was a slightly breezy, sunny summer morning with a few drops of rain at the end of the survey.
- 2.3 Plants were examined and noted to DAFOR rating. Moss samples and a few (dead or seeding) plant samples were collected for examination under a microscope. The site habitat was assessed with UKHab Ltd 2023 UK Habitat Classification Version 2 (at <https://www.ukhab.org>).
- 2.4 Any fly tipped larger items located were lifted to look beneath and examine. This can locate amphibians, signs of small mammals, invertebrates.
- 2.5 A representative invertebrate assessment was made of this simple, mostly bare or lawn site by lifting debris on the edge of the site to look for soil invertebrates.
- 2.6 This is not a breeding bird survey but the habitat was assessed for use by breeding birds.

3 DESK STUDY

- 3.1 A search of old maps on the National Library of Scotland website revealed the site has been a developed site for many years (e.g. developed on the 1840s OS Map) but there is no clue as to when the site was cleared and turned into a lawn/garden. It was shown built on at the time of the Council Unitary Development Plan map base.
- 3.2 A search of NBN Atlas and iRecord revealed no records for the site itself.
- 3.3 However in the locality mammals recorded in these suburbs are Hedgehog (Section 41, Red Data Vulnerable), Pipistrelle Bat species (Protected species), Fox, Wood Mouse, Brown Rat and Grey Squirrel.
- 3.4 There are no mapped ponds in the vicinity and none within 500m.
- 3.5 The birds recorded (with their statuses) in the local urban area (note records of wetland, woodland and open grassland birds found at Heaton Park opposite are excluded as the habitat in the application site is not the same):

Swift (Red), Swallow, House Martin (Red), Jackdaw, Magpie, Jay, Carrion Crow, Rook (Amber), Woodpigeon (Amber), Collared Dove, Rock Dove, Black-headed Gull (Amber), Bullfinch (Section 41, Amber), Goldfinch, Chaffinch, Greenfinch (Red), Blue Tit, Great Tit, Coal Tit, Long-tailed Tit, Goldcrest, Song Thrush (Section 41, Amber), Mistle Thrush (Red), Starling (Section 41, Red), Blackbird, House Sparrow (Section 41, Red), Dunnock (Section 41, Amber), Wren (Amber), Robin, Ring-necked Parakeet (Alien), Pied Wagtail.
- 3.6 A variety of beetles from records collected long ago to very long ago from Prestwich can be found on iRecord and NBN Atlas.

4 RESULTS OF FIELD SURVEY

- 4.1 A Habitat Survey Map is appended below. There are no Schedule 9 Invasive Alien plants to map.
- 4.2 10 native grass species, 33 native flowering forb and similar species, 5 native woody species (including Bramble) and 8 moss and liverwort species were recorded. Additionally 6 non-native taxa were recorded (including Sycamore). All of the species are common in England and Greater Manchester. None of the alien species are Schedule 9 Alien Invasives and none are problematic locally. The species lists are given below (D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare, V = Very, L = Locally). In this account one DAFOR is presented for the whole survey. The UKHab criteria present with the size of the plots are presented in the Introduction to this report.
- 4.3 **Lawn area on Bury Old Road.** This is a rectangular open plot with Bury Old Road to the east and a public bench partially and three bollards are inset into the grassland there. A metal palisade fence of the existing block of flats lies on the west side. The southern boundary runs a footpath distance from the building to the south side through the lawn area. The northern boundary is stepped and includes a paved strip at the foot of the building wall to number 211.
- 4.4 There is no fence to the southern boundary or the eastern boundary of the lawn area. The northern and western boundary to the lawn area consist of palisade fencing or the building wall of number 211. The gravel garden is ringed with paladin fencing to the north and west sides, and a palisade fence on the east side adjoining the lawn and on the south side.

The letters A to K are used in the BNG Metric. Note L = paving, M = seat base, N = bollards.

- A Grasses in lawn area:**
Perennial Rye-grass (F)
Yorkshire Fog (O-F)
Annual Meadow-grass (OVLF)
Smooth Meadow-grass (O-F)
Rough Meadowgrass (O)
Red Fescue (O)
Common Bent (O-F)
Creeping Bent (O)
Cock's-foot (O)
Flowering Forbs in lawn area:
Creeping Buttercup (OLF)
Selfheal (O-LF)
Daisy (OLF)
Ribwort Plantain (O)
Cuckooflower (O-F)
White Clover (O-LF)
Common Mouse-ear (O-F)
Yarrow (VLF)
Thyme-leaved Speedwell (O)
Broad-leaved Dock (VO)
Dandelion (O)

Common Ragwort (VO)
Common Chickweed (R)
Rhytidiadelphus squarrosus Moss (OLF-LA)

If the Condition Assessment (below) were to be believed this comes out at Good Condition. In other words as near to Priority Habitat Lowland Meadow you can get without actually being a Priority Habitat. And that is ridiculous. The lawn is most certainly not Poor Condition. Ergo Moderate Condition is appropriate. The BNG Metric has been completed to that effect.

B Roadside edge to lawn area:

Annual Meadow-grass
White Clover
Greater Plantain (LF)
Daisy
Dove's-foot Crane's-bill (VO)
Broad-leaved Willowherb (VO)
Dandelion
Pineappleweed (VO) (Alien - Global Register of Introduced and Invasive Species - Great Britain)
Shepherd's-purse (Alien - Global Register of Introduced and Invasive Species - Great Britain)
There are bollards inset into the lawn where herbicide has been applied.

C In the centre of the lawn is a large and healthy Silver Birch tree. The diameter at breast height (dbh) is c50cm, and the circumference is 172cm. Herbicide has been applied around the tree base to a diameter of c 2.8m. This is a Medium Tree for BNG purposes.

Plants ringing the tree are:

Perennial Ryegrass
Annual Meadow-grass
Rough Meadow-grass
Yorkshire Fog
Creeping Buttercup
Hoary Willowherb (O)
Daisy
Prickly Sow-thistle (R)
Smooth Sow-thistle (VO)
American Willowherb (Alien - Global Register of Introduced and Invasive Species - Great Britain)

D The 60 cm wide western boundary of the lawn area (herbicide applied) has:

Rough Meadow-grass
Red Fescue
Yorkshire Fog
Wood Avens
Herb Robert
Black Medick (R)
Creeping Buttercup

Short-fruited Willowherb
 Broad-leaved Willowherb
 Wavy Bitter-cress (LO)
 Wall Speedwell (LO)
 Thale Cress (VO)
 American Willowherb (Alien - Global Register of Introduced and Invasive Species - Great Britain)
Rhytidiadelphus squarrosus Moss
Kindbergia praelonga Moss (VLF)

E Northern boundary to lawn area along palisade fencing:

There are seven immature weed Sycamore trees with bases mostly in the neighbouring property but growing through the fence low down so as to produce most of the tree within the application site. They are destroying the fence. As these would have to be removed they are listed here, west to east:

Sycamore dbh 13cm	Small Tree for BNG
Sycamore dbh 12cm and 12cm (two stems)	Small Tree for BNG
Sycamore dbh 8cm and 7cm (two stems)	Small Tree for BNG
Sycamore dbh 7cm and 7cm (two stems)	No BNG value
Sycamore dbh 12.5cm	Small Tree for BNG
Sycamore dbh 8cm and 8cm (two stems)	Small Tree for BNG
Sycamore dbh 13cm, 10cm and 10cm (three stems)	Small Tree for BNG

There is also an Ash tree totally growing in the neighbouring property to the north, save for some slender branches passing the boundary, sandwiched between the palisade fence and the building. It appears to have Ash Die Back Disease. It would most likely be removed to prevent damage to the adjacent property should that site become occupied again. **It is not part of this application.**

F The ruderal /tall forb northern edge along the palisade fence has:

Sycamore saplings (LF) (Alien - Global Register of Introduced and Invasive Species - Great Britain)
 Ash saplings (LO)
 English Oak sapling (R)
 Bramble (LVO)
 There is also an uprooted tree stump with many woodworm holes
 Rough Meadow-grass
 Creeping Soft-grass (VLO)
 Creeping Bent
 Red Fescue
 Cleavers (VLF)
 Herb Robert
 Wood Avens (O-LF)
 Great willowherb (LF)
 Nettle (LO)
 Hoary willowherb
 Dandelion

Broad-leaved Dock
Thyme-leaved Speedwell

G The ruderal /tall forb northern edge of the lawn adjacent number 211 (herbicide applied) has:

Ash saplings
Rough Meadow-grass
Annual Meadow-grass
Creeping Soft-grass
Creeping Bent
Perennial Rye-grass
Yorkshire Fog
Red Fescue
Herb Robert
Wood Avens
White Clover
Smooth Sow-thistle
Dandelion
Broad-leaved Willowherb
Wall Speedwell
American Willowherb (Alien - Global Register of Introduced and Invasive Species - Great Britain)
Pineappleweed (Alien - Global Register of Introduced and Invasive Species - Great Britain)

F and G share a Condition Assessment (below). Amazing how a scrap of tall herbs on a fenceline and under weed trees can be wrongly assessed as Good or Moderate! The Condition Assessment is used to imply something might be good when it clearly isn't anything special. There are some common plants that won't be attracting anything uncommon, and as an invertebrate ecologist of 40 years' experience I know this. I am putting this down as Poor on the Metric whatever the CA says.

H The gravel garden is mostly stone - here and there a few wild plants can be found:

A small Goat Willow grows into the gravel garden from the flats' lawned area. No BNG value.
A small Sycamore grows into the gravel garden from the flats' lawned area. No BNG value.
Ivy-leaved Toadflax (LF) (Alien - Global Register of Introduced and Invasive Species - Great Britain)
Herb Robert
Groundsel (VO)
Bramble
Cleavers
Wood Avens
Great Willowherb

- I The concrete base to the steel paladin fence of the gravel garden has masses of small low mosses growing from it including:**
Brachythecium rutabulum Moss
Bryum capillare Moss
Bryum argenteum Moss
Ceratodon purpureum Moss
Didymodon insulans Moss
- J No one tends the single circular raised brick edged flower bed. It has:**
Field Horsetail (A)
Broad-leaved Dock
Dandelion
Herb Robert
Broad-leaved Willowherb
Curled Dock (R)
Wood Avens
Short-fruited Willowherb
Creeping Buttercup
Wavy Bitter-cress
Groundsel
American Willowherb (Alien - Global Register of Introduced and Invasive Species - Great Britain)
Ivy-leaved Toadflax (Alien - Global Register of Introduced and Invasive Species - Great Britain)
- K The Infant Street pavement within the application area has the following pavement edge plants:**
Annual Meadow-grass
Annual Pearlwort (R)
Thale Cress
Common Mouse-ear
Biting Stonecrop (R)
Wood Avens
Hoary willowherb
Short-fruited Willowherb
Groundsel
Wall Speedwell
Herb Robert
Shepherd's-purse (Alien - Global Register of Introduced and Invasive Species - Great Britain)
Ivy-leaved Toadflax (Alien - Global Register of Introduced and Invasive Species - Great Britain)
American Willowherb (Alien - Global Register of Introduced and Invasive Species - Great Britain)
Canadian Fleabane (VO) (Alien - Global Register of Introduced and Invasive Species - Great Britain)
Marchantia polymorpha Liverwort (R)

4.5 Fungi. The lawn area had a number of the common Mowers Mushroom *Panaeolus foenisecii*. As this is a created lawn on a demolition site it will not be of value to Waxcap CHEGD fungi species.

4.6 Invertebrates. All species/taxa encountered are common as the habitat, basically a garden, is common in the area and the UK.

Woodlice, Slugs, a Ground Beetle, a Rove Beetle, Worms, Centipedes, Garden Snail and Spiders were found under debris along the north boundary. Black Ants were disturbed in the pavement cracks. Of most interest was the 13mm wide Glass Snail *Oxychilus draparnaudi*, which may be an increasing alien species, and *Arcitalitrus dorrieni* an alien Landhopper.

4.7 Fish and amphibians. There are no waterbodies on site and no amphibians were found under debris. There are no ponds on Ordnance Survey maps within 500m metres and there are many barriers to amphibian dispersal. Amphibian distribution is well understood in Bury.

4.8 Reptiles. Nothing seen under debris and the habitat structure is wrong. Reptiles (other than dumped Terrapins) are virtually unknown in Bury District (and are unconfirmed where such vague records exist).

4.9 Breeding, wintering and migratory birds. There appears to be no potential bird nesting habitat on site, although typically a local authority will apply a planning condition to the removal of trees in order to protect nesting birds. A female Blackbird was seen passing across the site from Heaton Park, maybe to some of the mature gardens to the west. Heaton Park will draw any migrating or wintering birds away from this spot.

4.10 Bats. There are no trees or structures on site that could be used by hibernating or roosting Bats. The Silver Birch tree is free of Ivy and appears sound. The plot is potentially part of the local feeding mosaic available to Bats but the value is negligible compared with the habitats in Heaton Park. Managed lawns typically produce fewer insects upon which bats can feed than long grassland.

4.11 Mammals. The NBN Atlas has records of Hedgehogs in the wider area. Hedgehogs are a Red Data Near Threatened Section 41 Priority Species of Principal Importance and the Local Planning authority has a legal Biodiversity Duty to seek to conserve the species. There are no potential Hedgehog shelter sites in the site. No Hedgehog droppings were found.

4.12 There are no Schedule 9 alien invasive plants. Those alien species that are present are not considered detrimentally invasive.

4.13 Priority Habitats nearby. MAGIC Map and the Priority Habitats Inventory shows Woodland Priority Habitat as near as 44m to the northwest over Whittaker Lane south of Metrolink, and also to the north east 51 m away in Heaton Park over Metrolink, and just across the main road the vast expanse of Wood Pasture and Parkland Priority Habitat of Heaton Park. The area of Heaton Park opposite was for decades a large site of post-war temporary housing now returned to grassland. There appears very little linkage between these Priority Habitats and the application site.

5 DEVELOPMENT CONSTRAINTS

- 5.1 If the site is to be developed it appears from the Small Sites Matrix that there needs to be an off-site solution for Biodiversity Net Gain for the deficit. The site is not a Priority Habitat, Irreplaceable Habitat, SBI, Wildlife Corridor or Feature of Ecological Value. Total BNG trees to be removed within the site is 1 Medium and 6 Small.
- 5.2 From The Statutory Biodiversity Metric User Guide February 2024: “Principle 2 The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands”
- 5.3 A suitable planning condition is best applied in relation to clearing of the trees on site and on the boundary, in respect of nesting birds. Should lawn and boundary management cease and the grassland become tall and unmanaged then the planning condition would need to relate to all tall vegetation that might house nesting birds. Local Planning Authorities continually fail to write proper protections for bird nesting habitat.
- 5.4 On balance there is no need for a planning condition in relation to Hedgehogs.
- 5.5 Boltonandburyswifts@outlook.com are happy to advise regarding the new British Standard BS42021 which recommends 1 Swift Brick (universal brick to be used by Sparrows too) per 1 residential property. Bury Council now require that new builds have such installed via planning conditions.
- 5.6 The architect’s drawing provided shows the planting of new Laurel hedges and shrubbed gardens and these, though not native, can provide dense, evergreen foliage for use by nesting Blackbirds and other small birds.
- 5.7 To mitigate the impact on trees 9 new Rowan trees will be planted in then communal area.

6 STATEMENT OF MITIGATION HIERARCHY, BIODIVERSITY NET GAIN AND BIODIVERSITY GAIN PLAN

- 6.1 The proposal is to develop 7 housing units on a private managed lawn plot with main road frontage and an abandoned gravel garden. The site sits on top of a cleared urban site in the oldest parts of Heaton Park village. The site measures 646 square metres.
- 6.2 The lawn is of Moderate Condition as a Modified Grassland although, were a house attached, it would be classed as Vegetated Garden, which will be removed. There is a Good Condition Medium size Silver Birch Tree which will be removed. There are some Poor Condition Small size weed Sycamores growing through the palisade fence from a neighbouring industrial yard which will be removed. The biodiversity is described above. There are no nesting bird or Hedgehog issues. There are no Protected or Priority Species or Protected or Priority Habitats to be concerned about. There is no Site of Biological Importance or Wildlife Corridor or Feature of Ecological Value worthy of the Bury MBC policy. There is no Irreplaceable Habitat.

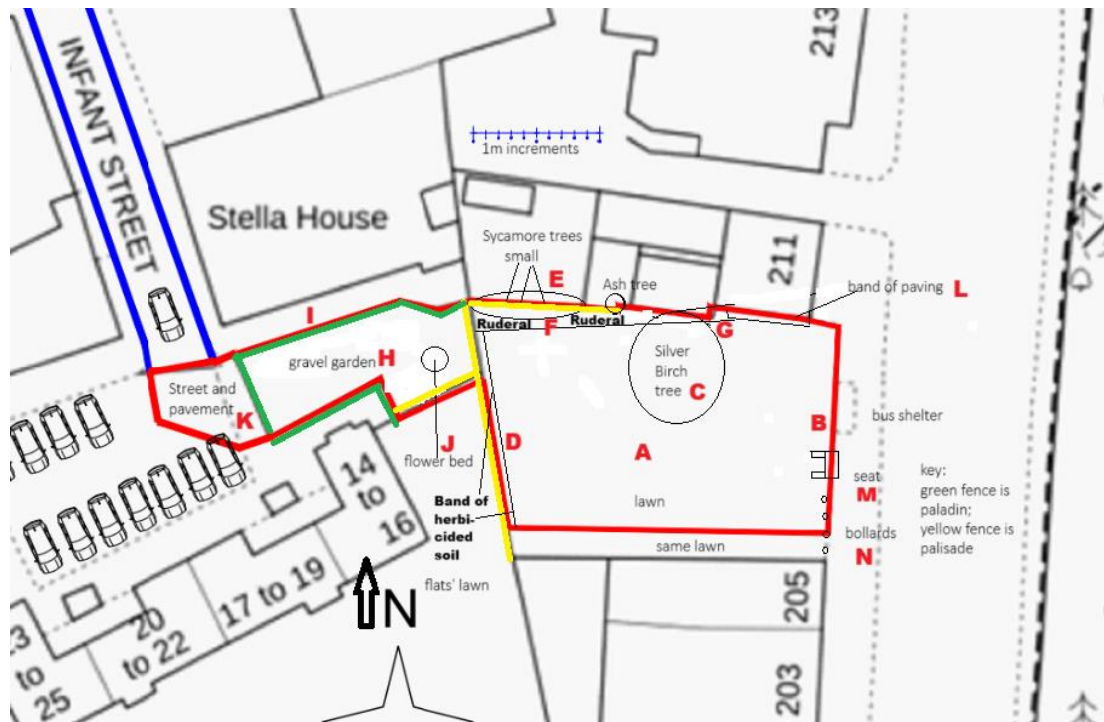
- 6.3 We have included some garden and Laurel bush and Rowan tree planting. "Gardens are non-significant enhancement that should still be included in your metric calculation". We state that there is no reason why the gardens will not exist for the lifetime of the building - and the service charge will include an element for gardening services.
- 6.4 The GMCA document of Mitigation Hierarchy Feb 2024 states this is to 1) avoid 2) mitigate 3) compensate - plus avoid damaging connectivity, achieve net-gain and make appropriate provision of the habitats connected to the development (the building service charge covers this last point).
- 6.5 It is not possible to avoid without scrapping the development. To mitigate the impact of slight losses of a managed lawn and a tree the LPA may condition what is set out in the Ecology Report. We have suggested a Swift Box is used and the LPA will need to condition this if they require it. We have shown a garden area, Rowan Trees - and Laurel bush planting which in time will provide bird nesting habitat where none exists.
- 6.6 To compensate the applicant will use a private sector Habitat Bank if the LPA cannot provide any Local Authority projects to support.

- 1 Baseline Units 0.38 (no hedges or watercourses)**
- 2 On-site intervention Units 0.13**
- 3 -64.74% is the net change**
- 4 Habitat Units required to meet target is 0.42**
- 5 Habitat Unit Deficit is 0.29. This is the important figure.**
- 6 BNG Target and Trading Rules not met so "off-site units required".**

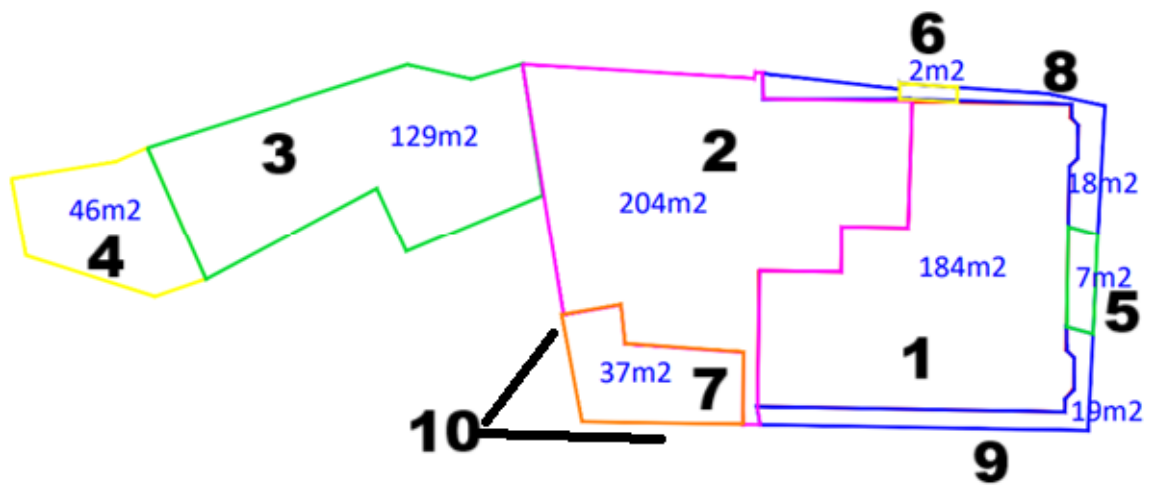
- 6.7 This statement is in line with <https://www.gov.uk/guidance/biodiversity-net-gain>:
 "The Biodiversity Gain Hierarchy and its effect for the purpose of the statutory framework for biodiversity net gain is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) sets out a list of priority actions:
- 6.8 first, in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and" **(WE HAVE SET OUT IN THE REPORT AND IN THE ACCOMPANYING METRIC WHAT THE APPLICANT WILL DO TO INCREASE TREE AND SHRUB COVER IN THE AREA, AND HOW THE APPLICANT WILL PURCHASE BIODIVERSITY CREDITS FROM A HABITAT BANK FOR THE MINIMAL TREE DEFECIT).**
- 6.9 "then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits." **(WE HAVE SET OUT HOW THE APPLICANT WILL PURCHASE BIODIVERSITY CREDITS FROM A HABITAT BANK FOR THE HABITAT UNIT DEFECIT).**

- 6.10 "Planning authorities must take into account how the Biodiversity Gain Hierarchy has been applied and if it has not been applied the reason for that or absence of a reason when determining whether to approve the Biodiversity Gain Plan. If they decide not to approve the Plan they must give reasons for that stating the elements of the plan that are relevant to the determination." (WE HAVE SET OUT OUR APPROACH TO THE BIODIVERSITY GAIN HIERACHY IN THIS SECTION 6 ABOVE).

Habitat Survey Map below:



Above. Completed development



Above. Plots sizes and ID numbers used in the BNG Metric for the “after” stage.

Below are photographs of the habitats on the combined site



Above Infant Street pavement



Above Infant Street



Above gravel garden and circular flowerbed



Above gravel garden



Above Silver Birch Medium Tree (note yellowing grass due to herbicide)



Above Row of Sycamore growing through NW boundary fence. Small Trees.



Above west boundary of lawn area with Sycamores (Small trees)(edge herbicided)



Above NW boundary of lawn area



Above north west boundary of lawn area (note paved areas)



Above lawn area from southwest corner



Above Lawn area from north east corner (and bench)



Above sick Ash tree just outside site



Site on 21/02/2025 (note bollards)

END

Condition Assessment for Silver Birch Tree

SILVER BIRCH TREE ID: C Medium Tree The diameter at breast height (dbh) is c50cm, and the circumference is 172cm		Criterion passed (Yes or No)	Notes (such as justification)
A	The tree is a native species (or at least 70% within the block are native species).	Y	
B	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).	Y	
C	The tree is mature (or more than 50% within the block are mature) ¹ .	Y	
D	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.	Y	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	
Number of criteria passed		5	
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved x/√	
Passes 5 or 6 criteria	Good (3)	Y	Good, healthy, attractive tree.
Passes 3 or 4 criteria	Moderate (2)		

Passes 2 or fewer criteria	Poor (1)		
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.			
Suggested enhancement interventions to improve condition score²			
Tree will be removed to facilitate development			

Condition Assessment for line of Sycamore weed trees

Condition Assessment Criteria ID: E		Criterion passed (Yes or No)	Notes (such as justification)
SYCAMORE LINE ON PERIMETER			
Sycamore dbh 13cm Sycamore dbh 12cm and 12cm (two stems) Sycamore dbh 8cm and 7cm (two stems) Sycamore dbh 7cm and 7cm (two stems) Sycamore dbh 12.5cm Sycamore dbh 8cm and 8cm (two stems) Sycamore dbh 13cm, 10cm and 10cm (three stems) "Lines, blocks or groups of trees found within and around the perimeter of urban land" – per The Statutory Biodiversity Metric User Guide July 2024		Small Tree for BNG Small Tree for BNG Small Tree for BNG No BNG value Small Tree for BNG Small Tree for BNG Small Tree for BNG	
A	The tree is a native species (or at least 70% within the block are native species).	N	UK Hab states Sycamore is an archaeophyte, not a native.
B	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).	Y	Growing closely through a fence. Rooted in neighbouring business yard, put passing through the fence low down.
C	The tree is mature (or more than 50% within the block are mature) ¹ .	N	Young trees.
D	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.	N	They are weeds growing through palisade fencing which is damaging both the fence and the tree. The base is regularly herbicided.
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	Young trees, smooth bark.

F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Half would be over a yard and half over the "lawn".
Number of criteria passed		2	
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved x/√	
Passes 5 or 6 criteria	Good (3)		
Passes 3 or 4 criteria	Moderate (2)		
Passes 2 or fewer criteria	Poor (1)	Y	Only neglect has allowed these weed trees to grow.
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.			
Suggested enhancement interventions to improve condition score ²			
Most likely the fence will need replacing and the trees will likely be grubbed out. However the developer need only coppice the tree to remove that part growing into their site.			

Condition Assessment for Lawn (Modified Grassland)

Habitat Description			
LAWN i.e. expanse of grassland rather than margins ID: A Lawn formed on demolition site in oldest part of Heaton Park village. Managed as a lawn with regular cuts and herbiciding of fringes all round and around central tree.			
ukhab – UK Habitat Classification	-	-	-
Condition Assessment Criteria	Criterion passed (Yes or No)	Notes (such as justification)	

A	There are 6-8 vascular plant species per m² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	Yes	For this I use the main species list at A In eco report. 9 grasses and 13 forbs recorded and one moss and one fungus. This most certainly gives a Yes to pass criterion.
B	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.	No	Maintained as a lawn
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Yes	It is a created lawn, not a natural grassland.
D	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.	Yes	No damage. Littering evident but as this is not building up it must be cleared by gardeners.
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Yes	Only bare ground is where herbicided.

F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes	No Bracken.
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Yes	No schedule 9 plants though other non-natives are present.
Essential criterion achieved (Yes or No)			Yes
Number of criteria passed			6
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved ×/√	
Passes 6 or 7 criteria including passing essential criterion A	Good (3)	Yes	Were a house attached to this plot it would be a vegetated garden. It is a created lawn on a demolition site
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)		
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)		
Suggested enhancement interventions to improve condition score			
Amazing how a created and managed weedy lawn on a demolition site can be wrongly assessed as Good! The Condition Assessment is used to say Good Quality Modified Grassland is when it clearly isn't anything of the sort. It is modified from imported soil, a pack of grass seeds and its location on a main road and opposite a park. As an ecologist of 40 years' experience I am putting this down as Moderate on the Metric whatever the CA suggests. The Statutory Biodiversity Metric User Guide July 2024 states: "Biodiversity metric principles Use the biodiversity metric principles in table 4 to inform the use of the biodiversity metric tool. Principle 3 This biodiversity metric should be used in accordance with established good practice guidance and professional codes. Continued..... Principle 4			

This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.”

Footnotes

Footnote 1 – Creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*.

Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.

Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.

Footnote 4 – Wildlife and Countryside Act 1981 (as amended).

Condition Assessment for Ruderal/ Tall forbs

Condition Sheet: URBAN Habitat Type

Habitat Types

Sparsely vegetated land - Ruderal/Ephemeral
 Sparsely vegetated land - Tall forbs
 Urban - Allotments
 Urban - Biodiverse green roof
 Urban - Bioswale
 Urban - Cemeteries and churchyards
 Urban - Facade-bound green wall
 Urban - Ground based green wall
 Urban - Intensive green roof
 Urban - Open mosaic habitats on previously developed land
 Urban - Rain garden
 Urban - Sustainable drainage system (SuDS)
 Urban - Vacant or derelict land
 Urban - Bare ground

Habitat Description

ID: F RUDERAL /TALL FORB northern edge along the palisade fence
ID: G RUDERAL /TALL FORB northern edge of the lawn adjacent number 211 (herbicide applied)

See the Statutory Biodiversity Metric User Guide for green roofs and UK Habitat Classification (UKHab) for other habitats:			UKHab – UK Habitat Classification
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
Core Criteria - must be assessed for all urban habitat types :			
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	No	This is a narrow disturbed habitat which all falls flat in winter- and gets Sycamore leaves dumped on it.
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Yes	But it is a tiny habitat
C	Invasive non-native plant species (listed on Schedule 9 of WCA ¹) and others which are to the detriment of native wildlife (using professional judgement) ² cover less than 5% of the total vegetated area ³ . Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Yes Complete Absence	There are no Schedule 9 species but other benign aliens are present
Essential criteria relevant for habitat type achieved (Yes or No)			No
Number of criteria passed			2
Condition Assessment Result	Condition Assessment Score	Score Achieved x/√	
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):			
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C.	Good (3)		

• Passes 2 of 3 core criteria; - OR • Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	Yes	
• Passes 0 or 1 of 3 core criteria.	Poor (1)		
Suggested enhancement interventions to improve condition score			
Amazing how a scrap of tall herbs on a fenceline and under weed trees can be wrongly assessed as Good or Moderate! The Condition Assessment is used to imply something might be good when it clearly isn't anything special. There are some common plants that won't be attracting anything uncommon, and as an invertebrate ecologist I know this. As an ecologist of 40 years' experience I am putting this down as Poor on the Metric whatever the CA suggests. The Statutory Biodiversity Metric User Guide July 2024 states: "Biodiversity metric principles Use the biodiversity metric principles in table 4 to inform the use of the biodiversity metric tool. Principle 3 This biodiversity metric should be used in accordance with established good practice guidance and professional codes. Principle 4 This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice."			
Footnotes			
Footnote 1 – Wildlife and Countryside Act 1981 (as amended).			
Footnote 2 – Sources of information about detrimental non-native species can be found on the GB Non-native Species Secretariat (GBNNSS) website:			
Home » NNSS (nonnativespecies.org)			
and Natural England Access to Evidence page should also be checked for up-to-date information:			
Horizon-scanning for invasive non-native plants in Great Britain - NECR053 (naturalengland.org.uk)			
For criterion C – For green roof habitat types only – buddleia <i>Buddleja davidii</i> should be assessed alongside Schedule 9 species. This species impairs the health of the local ecosystem and reduces the biodiversity potential of the roof. It is also a sign that a roof has not been planted and seeded correctly in subsequent years. Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.			

Footnote 4 – Use professional judgement. Sources of information about non-native species that are not detrimental to native wildlife can be found on the GBNNSS website:

Condition Assessment for proposed line of native Rowan trees

Condition Assessment Criteria			Notes (such as justification)
ROWAN TREES ID: 10 Nine standard Rowan trees will be planted. As young trees above 7.5cm diameter are not available all trees are initially classed as small. They will be planted in a row .			
A	The tree is a native species (or at least 70% within the block are native species).	Y	9 Rowan trees
B	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).	Y	Target condition will give continuous canopies
C	The tree is mature (or more than 50% within the block are mature) ¹ .	N	Young trees.
D	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.	Y	Young healthy stock will be planted and the garden and landscaping maintained by service charges.
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	Young trees, smooth bark. However the fruits and flowers will attract feeding birds.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Yes, all would spread over soft areas.
Number of criteria passed		4	
Condition Assessment	Condition Assessment Score	Score	

Result (out of 6 criteria)		Achieved x/√	
Passes 5 or 6 criteria	Good (3)		
Passes 3 or 4 criteria	Moderate (2)	Y	This is the target condition within 30 years.
Passes 2 or fewer criteria	Poor (1)		
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.			
Suggested enhancement interventions to improve condition score²			
Cannot be improved per Metric.			

The following can be found in The Statutory Biodiversity Metric User Guide July 2024

Table 4 Biodiversity metric principles

Principle number	Principle detail
Principle 1	The metric assessment should be completed by a competent person.
Principle 2	The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.
Principle 3	This biodiversity metric should be used in accordance with established good practice guidance and professional codes.
Principle 4	This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
Principle 5	Biodiversity units are a proxy for biodiversity and should be treated as relative values.
Principle 6	This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
Principle 7	Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
Principle 8	Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.
Principle 9	This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to: • maintain habitat extent - supporting more, bigger, better and more joined up ecological networks • ensure that proposed or retained habitat parcels are of sufficient size for ecological function

Oddly even if the original size is insufficient for much ecological function!!!

Page 26 : “Biodiversity metric condition sheets can be used to evidence good, moderate or poor condition. Fairly good and fairly poor are intermediate condition categories. If you need to use these, you should:

- complete a biodiversity metric condition assessment sheet
- make site specific judgements using ecological expertise
- explain any deviations against specific condition criterion
- provide ecological reasoning”

END