Biodiversity Net Gain Statement

Cross Gables

East Bierley

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All assessment is based upon, and accurate to, the information made available to Ecosurv Ltd prior to the completion of this report. Any alterations to this information at a later date will reduce the accuracy of this report, to which Ecosurv Ltd cannot be held accountable.

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EXECUTIVE SUMMARY

Ecosurv Ltd have been instructed to provide a Biodiversity Net Gain (BNG) Statement for the proposed development at Cross Gables, East Bierley.

BNG is the desired result of a process applied to development so that overall, there is a positive outcome for biodiversity. The process itself follows the mitigation hierarchy, which sets out that everything possible must be done to firstly avoid, secondly minimise and thirdly compensate for unavoidable impacts on or off site.

To demonstrate a positive biodiversity outcome using this process, the project is assessed against the Construction Industry Research and Information Association (CIRIA), the Chartered Institute of Ecology and Environmental Management (CIEEM), and the Institute of Environmental Management and Assessment (IEMA) Biodiversity Net Gain Good Practice Principles. The Statutory Biodiversity Metric (hereafter referred to as the Metric) has been used to quantify the biodiversity value of existing habitats present on site, and those proposed under the current design of the post-development landscape.

The proposed development site comprised of an area of bare ground which is sparsely colonised with forb species and grasses, and a small section of gappy native species hedgerow to the western site boundary. Historically the site accommodated large greenhouses, however these were demolished approximately 8 years previously. The site is situated centrally within the village of East Bierley and is largely enclosed by residential properties, with Bierley Marsh pond directly to the west.

The proposals are for change of land use and construction of a detached garage and garden associated with the adjacent residential property; Cross Gables. The proposals will involve the clearance of the existing habitats on site and new landscaping.

The conclusion of this Metric is that there will be total net unit change of -0.02 habitat units equating to -37.79%, and 0.01 hedgerow units equating to 100%.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.02
	Hedgerow units	-0.01
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-37.79%
	Hedgerow units	-100.00%
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

On-site habitat gains are unlikely to be achieved given the change of use to Residential Garden. There is currently a unit deficit of 0.03 habitat units, and 0.01 hedgerow units required to meet the 10% BNG targets that would require to be off-set through an off-site unit provider. As a last resort government statutory credits could be acquired, at 0.05 habitat units, and 0.03 hedgerow units.

Trading rules have not been satisfied under this calculation. The habitats requiring off-set are of low distinctiveness. Habitats of the same or higher distinctiveness can be used to offset these losses.

It is recommended that bird and bat boxes should be installed within the new buildings. The inclusion of such features would therefore add further improvements to biodiversity gain than that demonstrated within the calculations outlined within this statement. Some suggested features are shown in appendix 9.1.

1 INTRODUCTION

Ecosurv Ltd were instructed by Owens Developments to provide a Biodiversity Net Gain Statement for a proposed development at Cross Gables, East Bierley. The preparation of this report has been undertaken by Kay Richardson BA (Hons).

1.1 Project Information

The site is centred on Grid Reference SE19852913 and can be accessed by Bierley Marsh (Figure 1).

The proposed development site comprised of an area of bare ground which is sparsely colonised with forb species and grasses and a small section of gappy native species hedgerow to the western site boundary. Historically the site accommodated large greenhouses, however these were demolished approximately 8 years previously. The site is situated centrally within the village of East Bierley and is largely enclosed by residential properties, with Bierley Marsh pond directly to the west.

The proposals are for change of land use and construction of a detached garage and garden associated with the adjacent residential property; Cross Gables. The proposals will involve the clearance of the existing habitats on site and new landscaping.

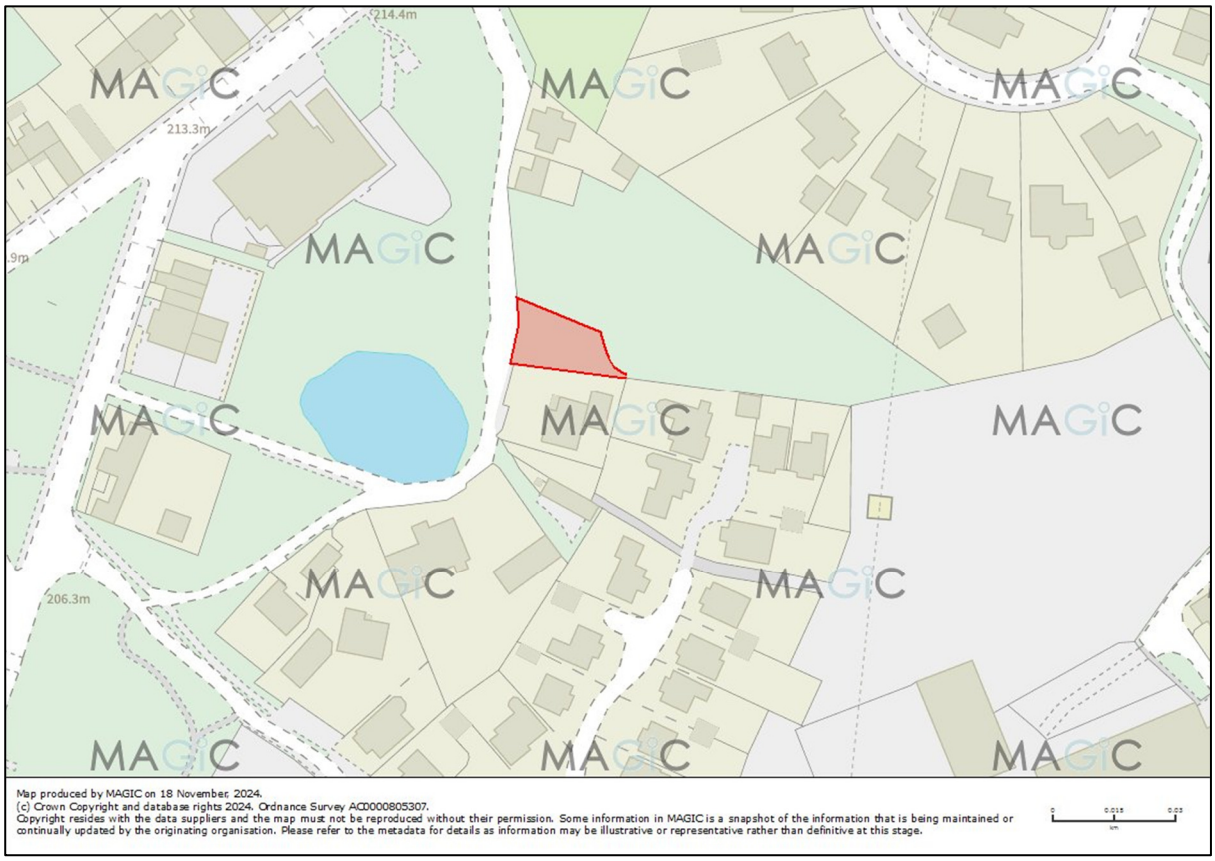


Figure 1. Site location plan.

(© Crown Copyright Ordnance Survey).

1.2 Biodiversity Net Gain

BNG is the end result of a process applied to development so that overall, there is a positive outcome for biodiversity. The process itself follows the mitigation hierarchy, which sets out that everything possible must be

done to firstly avoid, secondly minimise and thirdly restore / rehabilitate losses of biodiversity on-site. Only as a last resort, residual losses are compensated for using biodiversity offsets, which are distinguished from other forms of mitigation in that they are off the development site. BNG assessment reports are intended to provide a detailed insight into the adherence of a Proposed Development to the BNG Good Practice Principles.

To demonstrate a positive biodiversity outcome using this process, the project is assessed against the Construction Industry Research and Information Association (CIRIA), the Chartered Institute of Ecology and Environmental Management (CIEEM), and the Institute of Environmental Management and Assessment (IEMA) Biodiversity Net Gain Good Practice Principles. The Statutory Biodiversity Metric (hereafter referred to as the Metric) has been used to quantify the biodiversity value of existing habitats present on site, and those proposed under the current design of the post-development landscape.

The benefit of undertaking a BNG assessment at this stage in the planning process is that results can be used to: Inform the ongoing design of ecological and landscape mitigation; Identify whether current Proposed Development design will likely achieve a net gain, net loss, or no net loss (NNL) for biodiversity; and Demonstrate policy compliance in support of any decision-making.

Adopting a BNG approach can account for biodiversity losses which were previously not fully assessed and mitigated for, via legal and planning systems. Whilst some species are extensively protected, many are not; with the consequence that development can be 'legally compliant' but still result in biodiversity loss. The BNG approach guards against this, enabling development to contribute towards the national and global target of halting biodiversity loss by 2020 (DEFRA, 2011), and towards local and national strategies (listed below) for conserving and enhancing wildlife. BNG assessments allow stakeholders to demonstrate adherence to national legislation and local policy concerning biodiversity.

1.3 Relevant Legislation and Policy

This BNG assessment 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:

- The Natural Environment and Rural Communities (NERC) Act 2006;
- The UK Post-2010 Biodiversity Framework (2011-2020) (JNCC and DEFRA, 2012);
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (DEFRA, 2011);
- UK Biodiversity Action Plan (UKBAP);
- The National Planning Policy Framework (NPPF) 2019 (DCLG, 2012);
- UK Government's 25 Year Environmental Plan (DEFRA, 2018);

2 METHODS

A summary of the BNG assessment methods and details of project-specific data sources, assessment limitations, and assumptions are provided in the following section.

2.1 Data Sources

A site visit was completed in Novermber 2024, following the guidelines set out in the CIEEM Guidelines for Preliminary Ecological Appraisal (GPEA) document (CIEEM, 2017) and includes a standard habitat survey (JNCC, 2010, UKHAB 2023).

This report has been produced in accordance with the methodology set out in the following guidance documents:

- Statutory Biodiversity Metric Calculation Tool
- Statutory Biodiversity Metric User
- Statutory Biodiversity Metric Condition Sheets

The following Application documents submitted as part of the application have been used to inform this report:

- 24.113.101B Location Plan
- 24.113.102 Topographical Survey
- 24.113.103B Site Plan As Proposed

2.2 BNG Assessment

This BNG assessment uses the following industry recognised best practice methodologies:

- CIEEM, IEMA & CIRIA (2016). Biodiversity Net Gain: Good Practice Principles for Development.
- CIEEM, IEMA & CIRIA (2019). Biodiversity Net Gain. Good Practice P\principles for Development. A Practical Guide
- DEFRA (2024) Statutory Biodiversity Metric User Guide
- BS8683:2021 – Process for designing and implementing Biodiversity Net Gain – Specification

BNG assessment calculations are separated into four key sections which are used to produce the quantitative outcomes of the assessment. They are:

- Separating out irreplaceable baseline habitats and any mitigation proposed for impacts to irreplaceable habitats, from the main data set.
- Quantification of baseline biodiversity units using Phase 1 habitat data and habitat condition assessment data.
- Quantification of post-development biodiversity units using Phase 1 habitat data translated from the post-development landscape design.
- Assessing the net change in biodiversity value as a result of the Proposed Development.

It is important to recognise that the quantification of biodiversity is one of several factors to be considered when assessing the impact of the Proposed Development on biodiversity. Please note that this BNG assessment report does not cover potential impacts of the Proposed Development on protected species and designated sites. These are covered within the Ecological Impact Assessment.

JNCC Phase 1 habitat types determined in the habitat survey were translated to UK Habitat Classification (UKHab) (UKHab v2, 2023) habitat types using professional judgement, UKHab guideline documents and the habitat translation information provided in the Metric toolkit. Retained habitats in the post-development landscape design maintained the UKHab type assigned to the baseline.

In the Metric, distinctiveness is pre-assigned for each habitat based upon the UKHab system.

2.3 Limitations and Assumptions

The list of habitats provided in the DEFRA calculator are not all directly comparable with the habitats within the development both pre-and post-construction. As a result, professional judgement has been used to best match pre- and post-construction habitat types to those available within the DEFRA calculator.

Only direct impacts within the red line boundary of the Proposed Development were considered at this time. Any impacts on protected species, and indirect habitat impacts (including dust, shading and nutrient deposition) should be addressed separately from this assessment. Whilst not within the redline boundary specifically for this site, the access road has been included as this will have an impact upon the baseline features and the inherent complexities of prior approvals and existing applications in respect to timings of BNG being a mandatory requirement.

3 ON-SITE BASELINE HABITATS

3.1 Overview

There were no irreplaceable habitats or statutory designated sites within the site, therefore these are not discussed further within this report. There were no watercourses present within the baseline or Proposed Development, therefore these units were not assessed and are not discussed further within this report.

3.2 On-site Habitat Summary

The proposed development site comprised of an area of bare ground which is sparsely colonised with forb species and grasses, and a small section of gappy native species hedgerow to the western site boundary. The characteristics and ecological value of the habitat is summarised in Table 1 and shown on the baseline habitats map in figure 2.

Table 1. Area habitat summary

Broad Habitat Category	Habitat Type (Parcel Reference)	Area (ha)	Distinct-iveness	Condition	Description
Urban	Bare ground	0.0273	Low	Poor	The proposed development site comprised of an area of bare ground which is sparsely colonised with forb species and common grasses including clover *Trifolium repens,* creeping buttercup *Ranunculus repens,* creeping thistle *Cirsium arvense,* nettle *Urtica diocea,* dock *Rumex sp.* and groundsel *Senecio vulgaris*. Historically the site accommodated large greenhouses, however these were demolished approximately 8 years previously.
Urban	Developed land; sealed surface	0.0020	V.Low	N/A - Other	Localised area of degraded concrete is present to the west, this was formerly the footprint of a small shed.

3.3 On-site Hedgerow Summary

A small section of gappy native species hedgerow to the western site boundary. The characteristics and ecological value of the hedgerow habitat is summarised in Table 2 and are shown on the baseline habitats map in figure 2.

Table 2. Hedgerow habitat summary

Hedge Number	Habitat Type (Parcel Reference)	Length (km)	Distinct-iveness	Condition	Description

1	Native hedgerow	0.006	Low	Poor	Well maintained holly *Ilex aquifolium* and hawthorn *Crataegus monogyna* hedgerow to the western site boundary.

Figure 2. Baseline Habitat Map

4 PROPOSED DEVELOPMENT

4.1 Habitat Loss, Retention & Enhancement from Baseline

The proposals are for change of land use and construction of a detached garage and garden associated with the adjacent residential property; Cross Gables. The proposals will involve the clearance of the existing habitats on site and new landscaping.

A summary of the habitats to be lost, retained and enhanced from the sites baseline is presented in tables 3 and 4 below.

Table 3. Summary of habitat loss, retention & enhancement from baseline

Broad Habitat	Habitat Type	Baseline Area (ha)	Condition	Area Lost (ha)	Area Retained (ha)	Area Enhanced (ha)
Urban	Bare ground	0.0273	Poor	0.0293		
Urban	Developed land; sealed surface	0.002	N/A - Other	0.0020		

Table 4. Summary of hedgerow loss, retention & enhancement from baseline

Hedge Number	Habitat Type (Parcel Reference)	Baseline Length (km)	Condition	Area Lost (ha)	Area Retained (ha)	Area Enhanced (ha)
1	Native hedgerow	0.006	Poor	0.008		

4.2 Proposed post-development Habitats

A summary of the habitats to be created is presented in table 5 below. The proposed post intervention plans are shown in figure 3.

Table 5. Summary of created habitats

Broad Habitat	Habitat Type	Area	Condition	Notes
Urban	Developed land; sealed surface	0.0117	N/A - Other	New driveway and garage structure.
Urban	Vegetated garden	0.0176	Condition Assessment N/A	Residential garden.

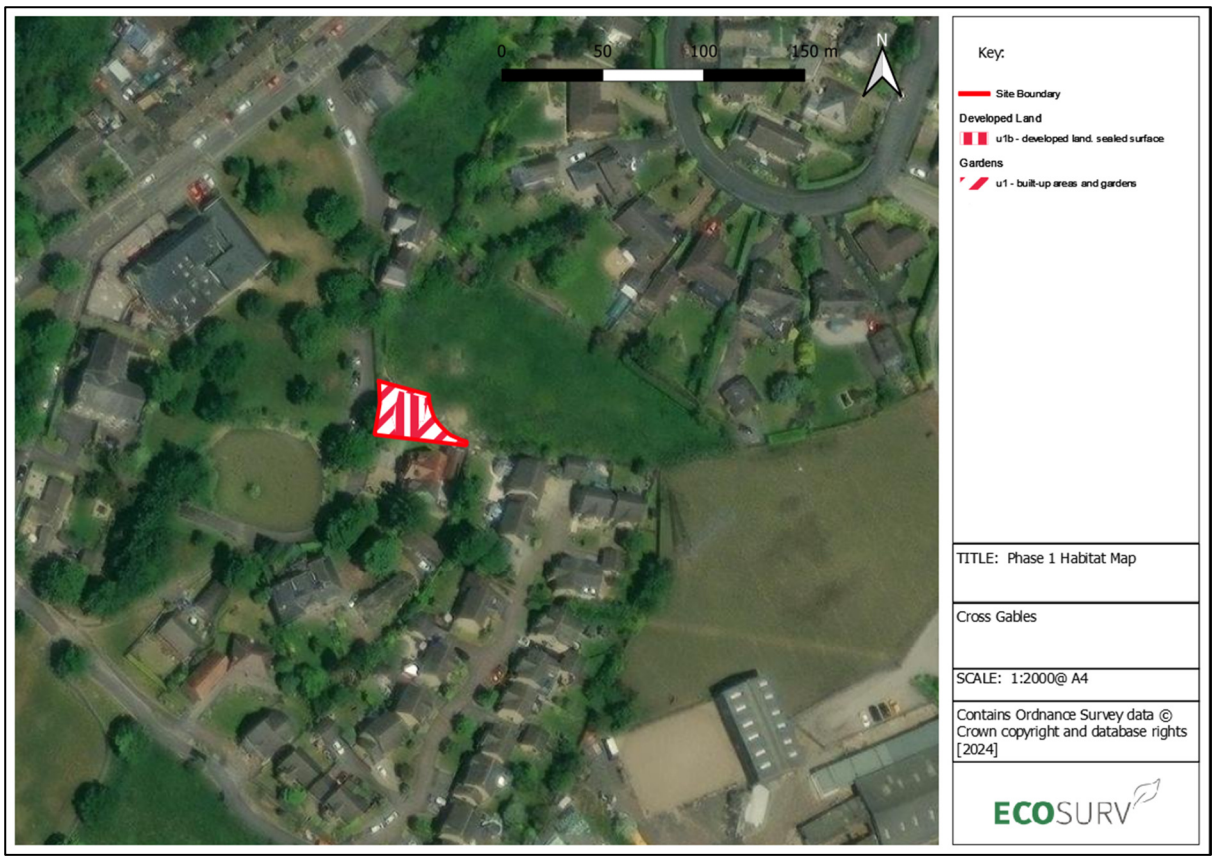
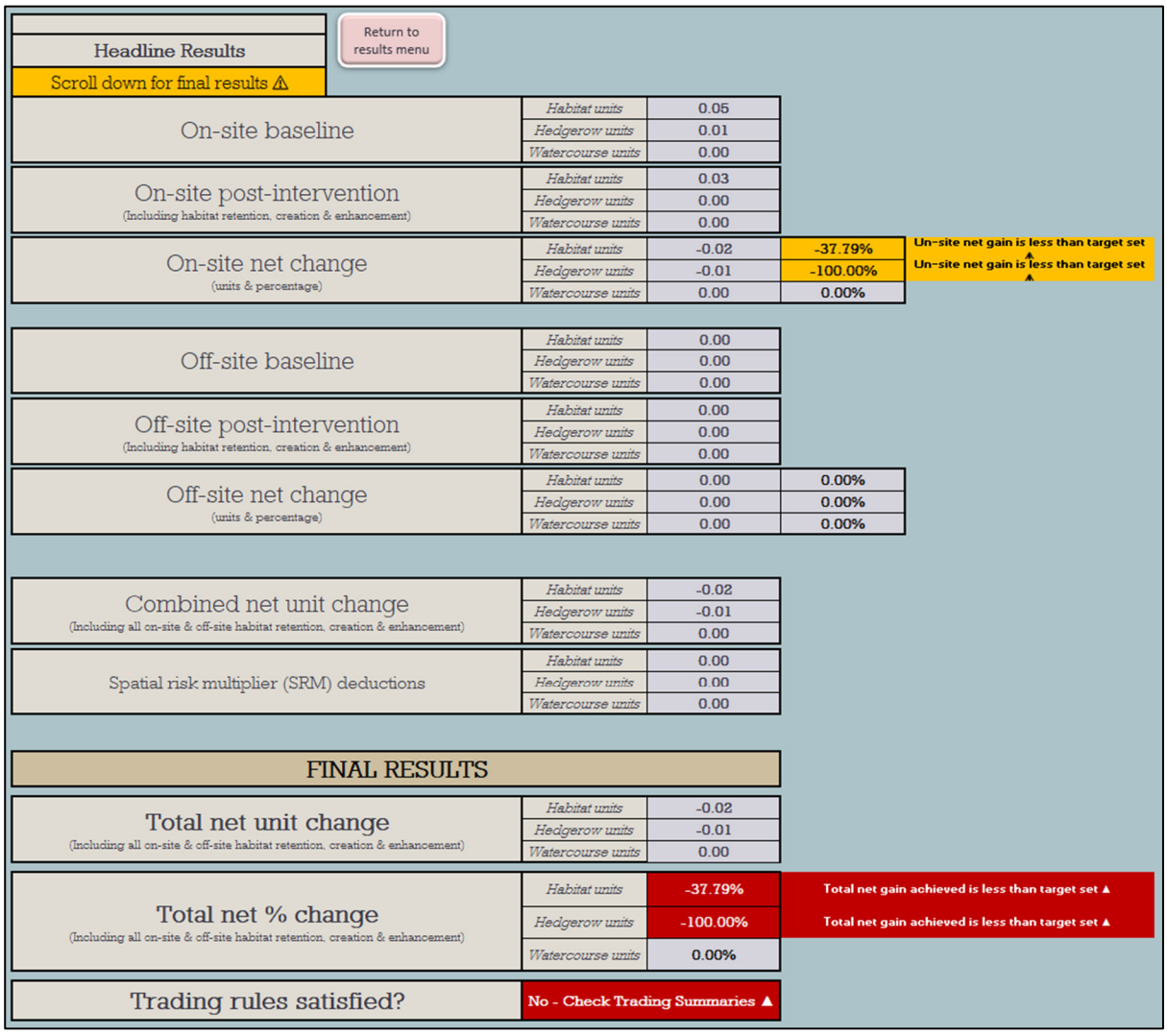


Figure 3. Proposed Habitat Plan

5 BNG METRIC RESULTS

The completed metric spreadsheet, including the full calculations that lead to the final biodiversity unit scores are submitted separately to this report. The headline results are provided in table 6 below. In summary, the conclusion of this Metric is that there will be total net unit change of -0.02 habitat units equating to -37.79%, and 0.01 hedgerow units equating to 100%. There is currently a unit deficit of 0.03 habitat units, and 0.01 hedgerow units required to meet the 10% BNG target.

Table 6. Headline Results



Headline Results				
Return to results menu				
Scroll down for final results ⚠				
On-site baseline	*Habitat units*	0.05		
	Hedgerow units	0.01		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.03		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site net change (units & percentage)	*Habitat units*	-0.02	-37.79%	On-site net gain is less than target set ▲
	Hedgerow units	-0.01	-100.00%	On-site net gain is less than target set ▲
	Watercourse units	0.00	0.00%	
Off-site baseline	*Habitat units*	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	*Habitat units*	0.00	0.00%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.02		
	Hedgerow units	-0.01		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.02		
	Hedgerow units	-0.01		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-37.79%	Total net gain achieved is less than target set ▲	
	Hedgerow units	-100.00%	Total net gain achieved is less than target set ▲	
	Watercourse units	0.00%		
Trading rules satisfied?	No - Check Trading Summaries ▲			

5.1 Trading Summary

Trading rules have not been satisfied under this calculation. See Table 7 below for breakdown of trading summaries. The habitats requiring off-set are of low distinctiveness. Habitats of the same or higher distinctiveness can be used to offset these losses

Table 7. Trading Summary

Trading Summary		
Distinctiveness Group	**Trading Rule**	**Trading Satisfied?**
Very High	Same habitat required – bespoke compensation option ⚠	**Yes ✓**
High	Same habitat required =	**Yes ✓**
Medium	Same broad habitat or a higher distinctiveness habitat required (≥)	**Yes ✓**
Low	Same distinctiveness or better habitat required ≥	**No ▲**

6 BNG GOOD PRACTICE PRINCIPLES FOR DEVELOPMENT

The table below discusses adherence of the Proposed Development to each of the BNG Good Practice Principles.

Table 8. BNG Good Practice Principles.

Principle	Description	Evidence	Current Outcome
1. Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decisionmakers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.	Habitat losses have not been compensated for under scheme.	Not achieved
2. Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.	No irreplaceable habitats will be impacted by the proposed development.	Achieved
3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible.	The BNG outcome is to be shared with relevant stakeholders through delivery of the proposed development.	Achieved
4. Address risks	Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.	The BNG assessment used industry recognised risk multipliers from the Metric.	Achieved

5. Make a measurable Net Gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.	The BNG assessment determined a quantitative: • Net loss for area habitats • Net loss for hedgerow habitats	Not Achieved
6. Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when: • Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses; • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; • Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels. • Enhancing existing or creating new habitat. • Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.	Existing habitats on site of a relatively low value.	Not Achieved
7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations i.e. do not deliver something that would occur anyway.	N/A	Not Achieved

8. Create a Net Gain legacy	Ensure Net Gain generates long-term benefits by: • Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity. • Planning for adaptive management and securing dedicated funding for long-term management. • Designing Net Gain for biodiversity to be resilient to external factors, especially climate change. • Mitigating risks from other land uses. • Avoiding displacing harmful activities from one location to another. • Supporting local-level management of Net Gain activities.	Where on site net gain applies, or where off-site gains are used within the wider ownership, appropriate habitat creation and future management measures should be implemented to ensure successful establishment of habitats and their maintenance in a favourable condition. Such measures will be stipulated in a BNG Habitat Management and Monitoring Plan, focused on the delivery of long-term management and monitoring of created or enhanced features.	Achieved
9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	The proposals seek to enhance existing site biodiversity by incorporating integrated bat and bird boxes within the final design.	Achieved
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	The BNG outcome is to be shared with relevant stakeholders through delivery of the Scheme.	Achieved

7 IMPLEMENTATION

A selection of a range of trees and shrub, including flowering and fruiting varieties, alongside species rich grassland mixes, will create some value for invertebrates, herpetofauna, birds and small mammals. This approach to improving biodiversity means that the habitats on site can support a range of species and provide other food sources, which will then provide a benefit to the larger fauna in the local area.

7.1 Source and Species

Flowering vegetation will attract a range of butterflies, moths and insects which will in turn provide a food source for birds, bats, other mammals and amphibians. The linear features of the site will ensure that green corridors are present across the site and that the site is connected to other areas of suitable habitats in the wider area.

New planting within the site will consist of native, locally grown species wherever possible and should be suitable for planting. Should these not be obtainable locally, alternative suppliers shall be identified to provide appropriate specimens grown elsewhere within the UK.

Species planted should mostly comprise of a similar species mix to that found in the local area and surrounding the site. However, the provision of some other native species not common to the area should also be included considering the potential impact of future global warming. **Ash *Fraxinus excelsior* trees should not be planted at present** until a reliable source of this species can be found that is unaffected by Ash dieback disease.

The off-site habitat enhancements will seek to use species of local provenance, to maintain the semi-natural character of these habitats.

7.2 Biodiversity Measures Outside the Metric Calculation

In accordance with BS8683:2021 Process for designing and implementing Biodiversity Net Gain – Specification "Biodiversity enhancement measures that supplement the projects Biodiversity Net Gain Targets and are outside the scope of a metric, should be described and where possible quantified.

In addition to the habitat enhancement and creation measures within this report, it is recommended that bird and bat boxes should be installed within the new buildings. See appendix 9.1 for some example boxes.

7.3 Habitat Management and Monitoring Plan

The BNG Habitat Management and Monitoring plan is a document that focuses on the delivery of long-term management and monitoring of created or enhanced features. For example, a BNG HMMP plan would typically provide detailed management and maintenance information for years 1 – 5 and with broader management aims for the lifetime of the BNG commitment, e.g., the lifetime of the project impacts or 30 years.

- Plans shall be concise, proportionate and SMART. i.e., each target set is Specific to a feature that can be Measured accurately, reasonably achievable within the project scope and time bounded.
- Proposals for monitoring, including methods, frequency and timing should be included, as well as setting out the reporting procedures and options for remedial works, if needed.
- The roles, responsibilities and competency requirements of those involved in implementing the BNG MMP should be clearly stated and secured.
- Legal, financial and other resource requirements for delivery of the BNG MMP should be detailed.

- Maps and drawings should be provided in spatially accurate digital drawings, e.g., using GIS to allow accurate monitoring.

8 CONCLUSION & RECOMMENDATIONS

The conclusion of this Metric is that there will be total net unit change of -0.02 habitat units equating to -37.79%, and 0.01 hedgerow units equating to -100%. Trading rules have not been satisfied under this calculation. The habitats requiring off-set are of low distinctiveness. Habitats of the same or higher distinctiveness can be used to offset these losses.

On-site habitat gains are unlikely to be achieved given the change of use to Residential Garden. There is currently a unit deficit of 0.03 habitat units, and 0.01 hedgerow units required to meet the 10% BNG targets that would require to be off-set through an off-site unit provider. As a last resort government statutory credits could be acquired, at 0.05 habitat units, and 0.03 hedgerow units.

In addition to the habitat enhancement and creation measures within this report, it is recommended that bird and bat boxes should be installed within the new buildings. The inclusion of such features would therefore add further improvements to biodiversity gain than that demonstrated within the calculations outlined within this statement. Some suggested features are shown in appendix 9.1.

9 APPENDICES

9.1 Example Compensatory and Enhancement Features

Habibat Integrated Nest Boxes; Sparrow Terrace (Left) and Swift Bricks (right)

Integrated Bat Roosting/Access Features

3S Integrated Bat Box

Clay Access Tile

9.2 Proposed Development Plan

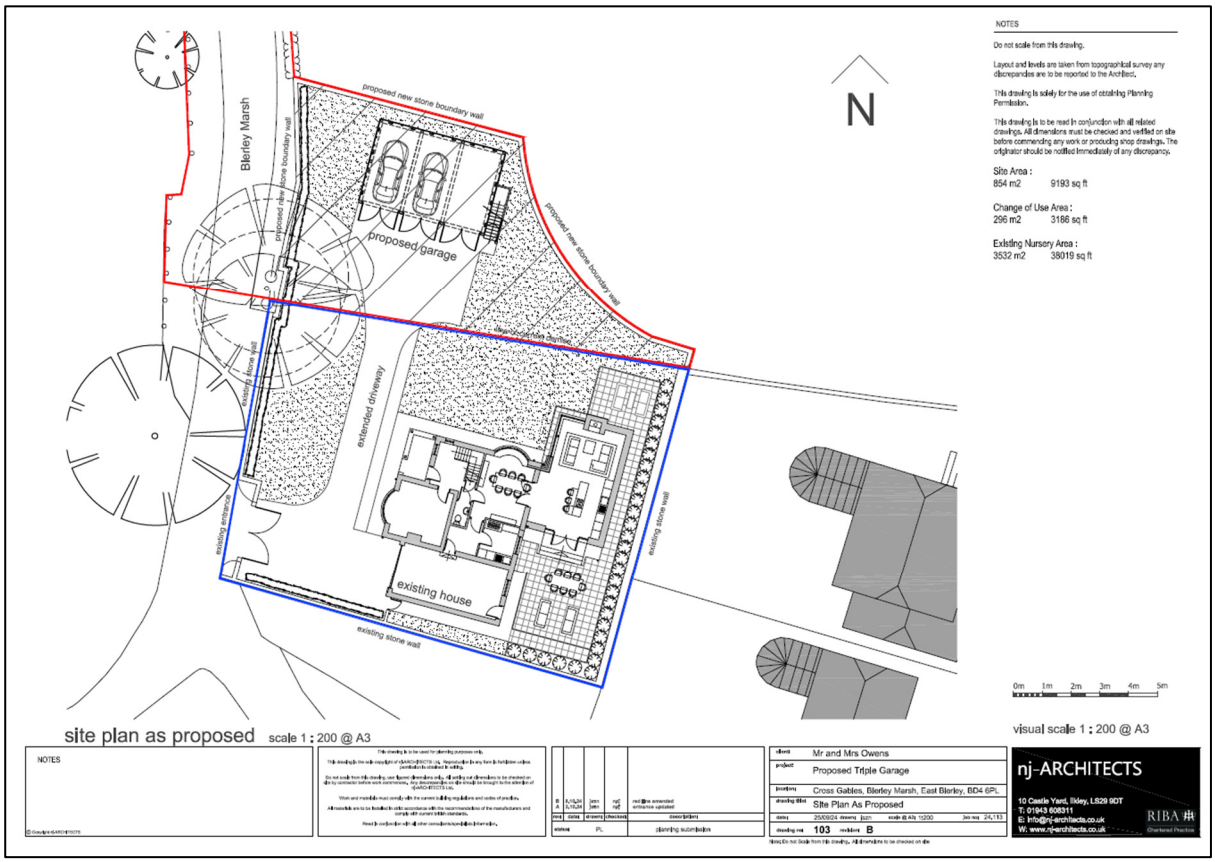


Figure 4. Proposed Development Plan

9.3 Habitat Condition Assessment Summary

Broad Habitat	Habitat Type (ref)	Condition Sheet	A	B	C	D	E	F	G		Total Score	Condition	Notes
Urban	Bare ground	22A. Urban.	F	F	P	-	-	-	-		1/3	Poor	Passed 1/3 criteria.
Urban	Developed land; sealed surface	Not assessed	-	-	-	-	-	-	-		-	N/A - Other	Condition Assessment N/A
Broad Habitat	Habitat Type (ref)	Condition Sheet	A1	A2	B1	B2	C1	C2	D1	D2			
Hedgerows	Native hedgerow	8A. Hedgerow.	F	F	P	F	F	F	P	F	2/8	Poor	Passed 2/8 criteria.