

Biodiversity Net Gain Exemption Statement

Report reference:	WC-395.2
Revision:	a
Client:	BDB Special Projects Ltd
Site address	Church Inn, Castle Hill Road, Bury BL9 6UH
OS Grid reference:	SD 82984 12229
Report prepared by:	Amy Reddick ACIEEM
Date:	12 th March 2026

1. Introduction

1.1. Scope of Report

- 1.1.1.** Woodsage Consulting Ltd has been instructed by BDB Special Projects Ltd, to provide a Biodiversity Net Gain (BNG) Exemption Statement in relation to a proposed development of the Church Inn, Castle Hill Road, Bury BL9 6UH.
- 1.1.2.** The purpose of this report is to demonstrate that the development proposals are exempt from statutory BNG as required by the Environment Act 2021.

1.2. Site Details

- 1.2.1.** The Church Inn - hereafter referred to as 'the site' and shown in **Fig. 1.1**, is located approximately 2.9km to the east of Bury and is centred on OS Grid Reference SD 82984 12229.



Figure 1.1: Aerial imagery showing the approximate boundaries of the site, outlined in red.

- 1.2.2.** The site covers approximately 0.6 ha and currently comprises the Church Inn, associated parking and beer garden and surrounding landscaping and trees.
- 1.2.3.** The site is bound by access road to the north and south and by agricultural fields to the east and west.

1.3. Development Proposals

- 1.3.1.** The development proposals are for a change of use from the existing public house to an office with associated parking and amenities, including a staff garden.

2. Methods

- 2.1.1.** This document should be read in conjunction with the following reports:
 - WC-395.1a Biodiversity Net Gain Assessment: Church Inn, Castle Hill Road, Bury BL9 6UH ¹
 - Preliminary Ecological Appraisal and Roost Assessment: The Church Inn, Castle Hill Road, Rochdale, Bury, Greater Manchester, BL9 6UH ²
- 2.1.2.** A site survey was carried out by Amy Reddick on Sunday the 30th of March 2025.
- 2.1.3.** A walkover survey was carried out at the site, during which the existing habitats were categorised and recorded using the UK Habitat Classification³.
- 2.1.4.** Within the grassland habitats the overall abundance of species was recorded to DAFOR scale during the walkover. In addition, five 1 x 1m quadrats were undertaken during which all of the species present within the quadrat were identified and their relative percentage cover recorded.

¹ Woodsage Consulting Ltd (2025) Biodiversity Net Gain Assessment: Church Inn, Castle Hill Road, Bury BL9 6UH (WC-395.1a). 12 April 2025.

² Arbtech Consulting Ltd (2025) Preliminary Ecological Appraisal and Roost Assessment: The Church Inn, Castle Hill Road, Rochdale, Bury, Greater Manchester, BL9 6UH. 9 April 2025.

³UKHab (2020). UK Habitat Classification Basic Edition: Suggested Symbolology for Maps. [online]. Available at: > <https://ukhab.org/> < [accessed 18th March 2025].

3. BNG Update

3.1. Legislative background

- 3.1.1.** There are specific exemptions from biodiversity net gain for certain types of development. The exemptions are set out in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.
- 3.1.2.** One of these exemptions is development subject to the *de minimis exemption*. This refers to development which does not impact a priority habitat, and which impacts less than 25 square metres (e.g. 5m by 5m) of onsite habitat and 5 metres of linear habitat such as hedgerows.

3.2. Changes to the proposed scheme

- 3.2.1.** Upon submission of the planning application (25/01118/FUL) and following feedback from the Local Planning Authority the proposed scheme has been amended in the following ways relevant to BNG:
- Removal of the large detached storage unit
 - Removal of the detached amenity building
 - Removal of the provision of HGV, plant and large vehicle use and storage
 - Remove hardstanding providing access to detached storage building
 - Increase parking / reinstate parking previously identified for HGV, Plant and large vehicles
 - Retention of the existing garage building with slight extension to west
 - Modification of the red line boundary to correspond with the BNG Assessment.
- 3.2.2.** These amendments to the proposals mean that the majority of development, including the two proposed extensions, will occur within the extents of the existing hardstanding and therefore will not affect any habitat with a biodiversity value higher than 0 according to the Statutory Biodiversity Metric.

3.3. Evidence of exemption

- 3.3.1. The widening of the access to the site will result in the loss of approximately 10.27m² of modified grassland. These areas are depicted below in **Figure 3.1** and in relation to the revised proposed site plan in **Figure 3.2**.

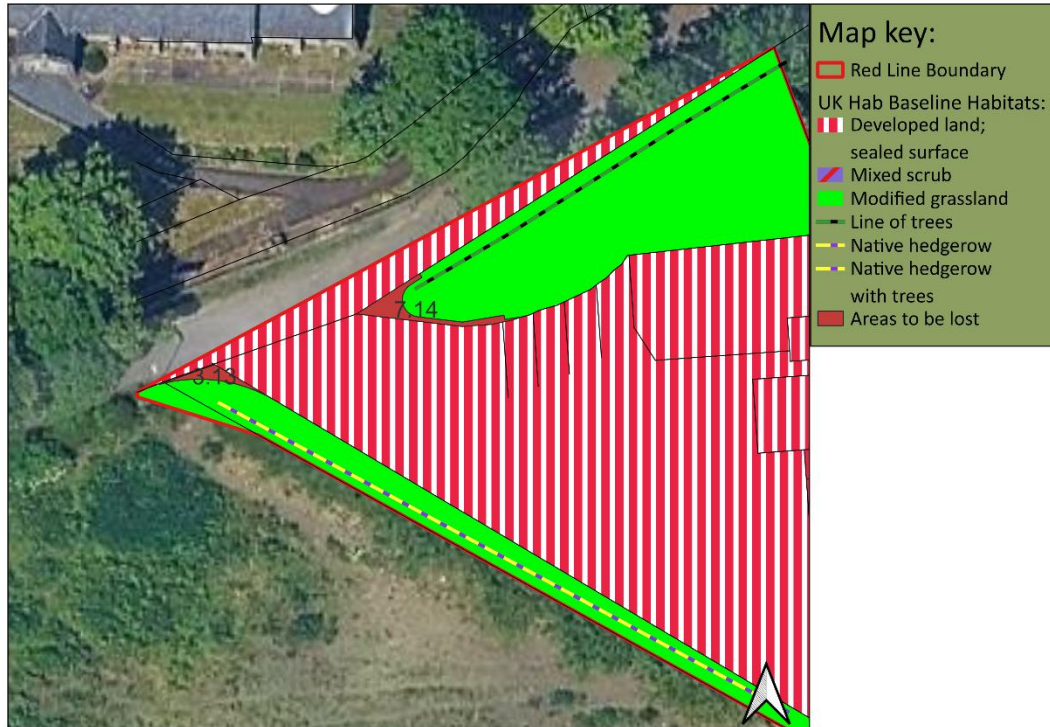


Figure. 3.1 The habitats on-site and the habitats to be removed to facilitate widening the access

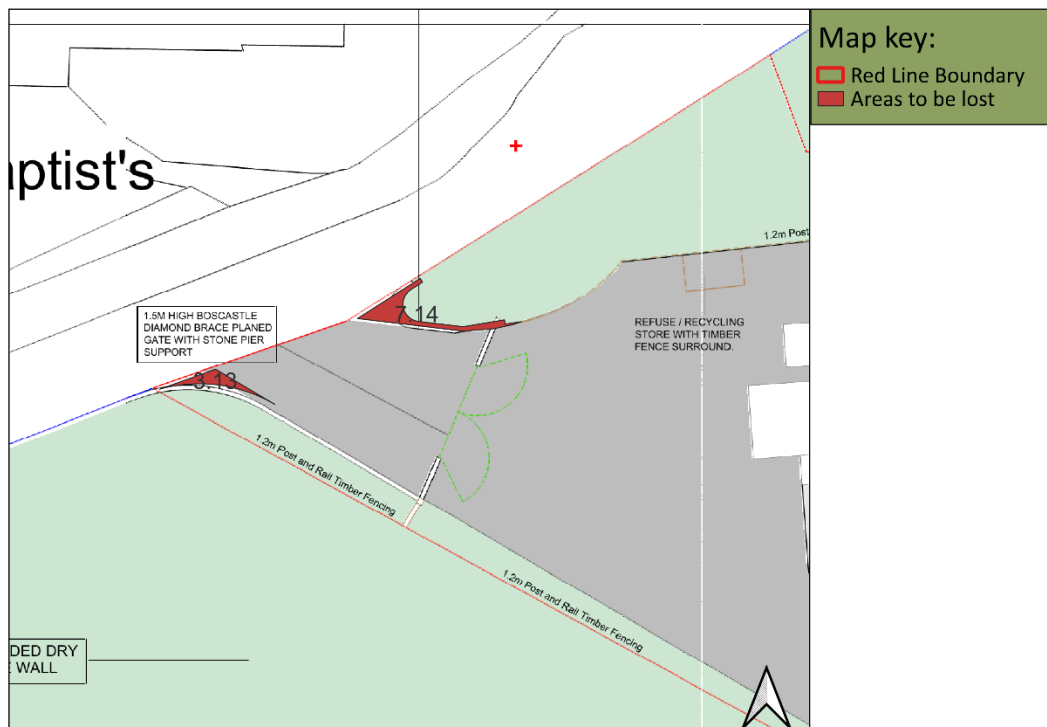


Figure. 3.2 The removed habitats in relation to the updated proposed site plan.

- 3.3.2.** According to the survey conducted to inform the BNG Assessment, the on-site habitat to be removed is categorised as modified grassland in poor condition. An extract from the BNG Assessment is provided below in relation to the habitat parcels affected by the development (MG2 and MG3):

Three parcels of modified grassland are present on the site comprising the pub beer garden (MG1), and car park verges (MG2 & 3). All three grasslands are relatively similar in composition with a short frequently mown sward and sown with hard wearing grass mixtures. Species present include Yorkshire fog Holcus lanatus (F), Perennial ryegrass Lolium perenne (A), ribwort plantain Plantago lanceolata (F), white clover Trifolium repens (O), common daisy Bellis perennis (O) annual meadowgrass Poa annua (O), field wood-rush Luzula campestris (O), common mouse-ear Cerastium fontanum (O), willowherb species Epilobium sp (O), broadleaf plantain Plantago major (O) common dandelion Taraxacum officinale agg. (O), creeping buttercup Ranunculus repens (R), common sorrel Rumex acetosa (R), creeping thistle Cirsium arvense (R), common nettle Urtica dioica (R), common ragwort Jacobaea vulgaris (R), cat's ear Hypochaeris radicata (R). Several introduced species are also present within the car park verges (MG2 & 3) including ornamental daffodil species Narcissus sp, tulip species Tulipa sp and common field speedwell Veronica persica. Areas of bare ground were observed within MG2 on a banking close to the pub building. All of the modified grassland is considered to be poor condition due to failing essential criterion A.

- 3.3.3.** It is noted that the accompanying PEA broadly categorised these habitats as upland acid grassland, along with the adjacent fields. However, neither of these habitats would be considered to be a priority habitat as listed by the Secretary of State for Environment, Food and Rural Affairs under section 41 of the Natural Environment and Rural Communities Act 2006. Additional photographs of the grassland are provided in **Appendix 1**.

3.4. Conclusion

- 3.4.1.** Given the loss of habitat as a result of the updated proposals is less than 25m², equating to 10.27m², and that these are not priority habitats it is considered the development is within the scope of the de minimis exemption.
- 3.4.2.** This exemption statement therefore supersedes the previously submitted BNG Assessment and is considered valid provided the proposals are not amended further.

Appendix 1: Photographs

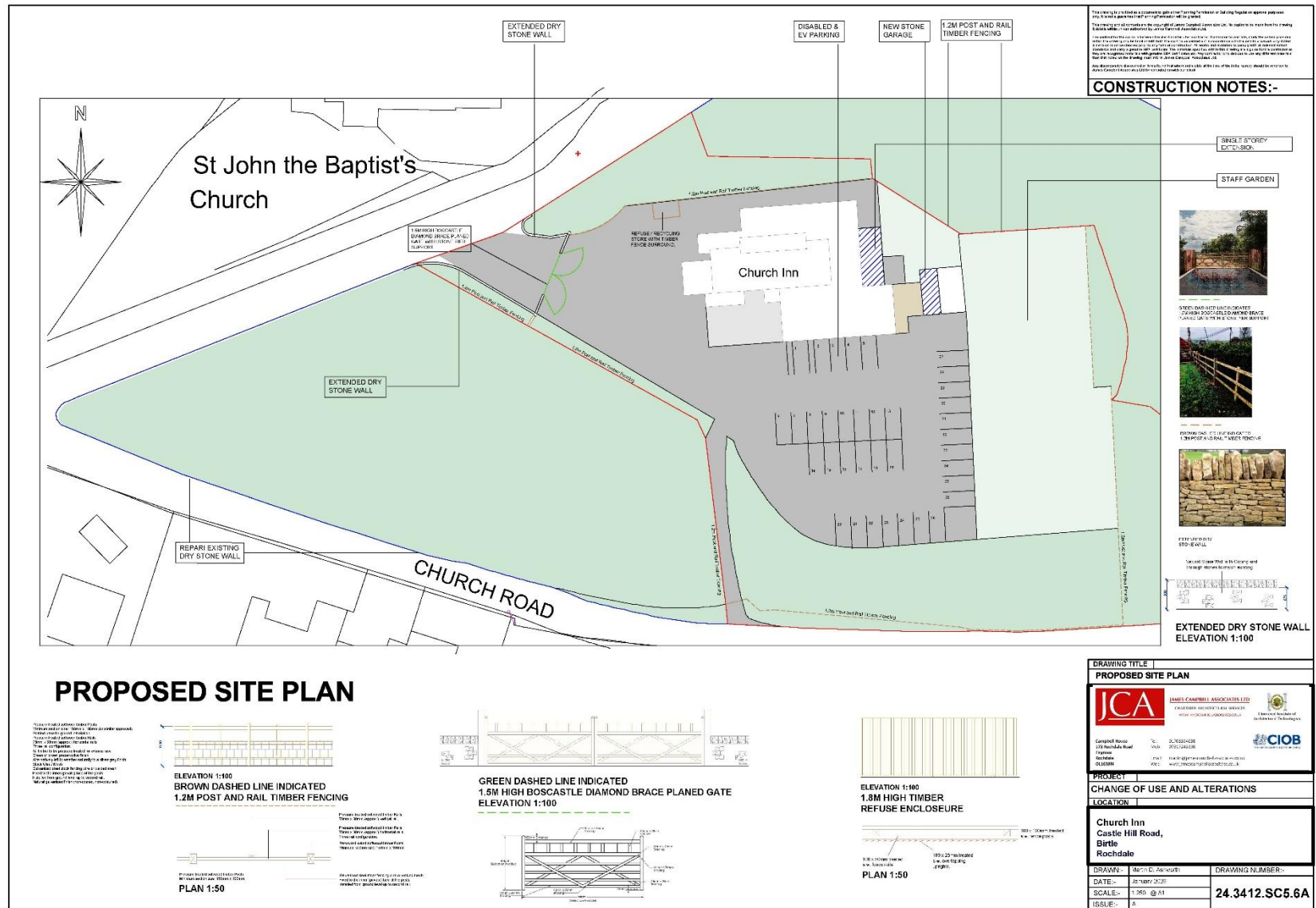


Photo 1 From the site access towards the east of the site and MG2



Photo 2 Further photo of the character of MG2

Appendix 2: Revised proposed site layout



Appendix 3: Baseline Habitat Map

Site Name:	Church Inn
Drawing No.:	WC 395.2a 1
Client:	BDB Special Projects Ltd
Revision:	1
Drawn by:	Amy Reddick
Date:	13/03/2025
Scale:	1:800 @ A4

Map key:

 Red Line Boundary

UK Hab Baseline Habitats:

 Developed land; sealed surface

 Mixed scrub

 Modified grassland

 Line of trees

 Native hedgerow

 Native hedgerow with trees