

NEW PLANNING APPLICATION

**Updated Biodiversity Net Gain Calculation and updates on
Alien Invasive Species**

**for a garden plot at 1 Lister Road,
Rhodes, Middleton, Rochdale District
Greater Manchester**

By

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1 INTRODUCTION

- 1.1 The garden plot at 1 Lister Road, Rhodes, Middleton, Rochdale District (SD 8475 0499) was given planning consent for a new dwelling and this has now been built. However there is a change to the red line of the development, increasing its size, and including a new annexe building, an increased hard yard surfaces, and a change to the gardens and shrub planting scheme. This report is provided to give a revised Biodiversity Net Gain (BNG) figure for the development as it now is. The site was revisited by Dave Bentley Ecology Services on 28/04/2026.
- 1.2 The site was originally surveyed to the CIEEM Guidelines for Preliminary Ecological Appraisals Second Edition 2017 and for Biodiversity Net Gain by Dave Bentley Entomology and Ecology Services on 18th June 2024. The large end-terrace garden plot was being considered for a planning application to construct an additional detached house. The plot for the new development now measures 450 square metres (figure provided by the architect April 2026) and this takes in additional land to the east as far as the western base of the hedgerow/tree line on the lane and also includes the rear garden of the end terrace 1 Lister Road, as opposed to just the side garden, and adds in a new carriage crossing location. The development is all but complete.
- 1.3 This is what the red line area of extended plot included at the relevant time prior to clearance for the building project:
- A paved and concrete pad area and a shed area amounting 85.8 square metres;
 - A rough vegetated side garden at 156.8 square metres;
 - An area of permanently bare soil under the abandoned rear caravan of 11.4 square metres;
 - The additional rear vegetated garden of 105 square metres;
 - A carriage crossing at the north east corner of the property, with a curved corner, of 8 square metres approximately;
 - The balance, an area of tall herbs, notably Nettles, between the side garden and the hedge/treeline base of 83 square metres.
 - The project required the removal of 3 Sycamore trees from the treeline/hedge, these being Medium Trees for BNG. There were two trees on the roadside, and another halfway down the hedge-line and offset. Each of these are large mature trees with a Diameter at Breast Height (1.5m) considered to lie between 30 and 60 cm making them Medium Trees, judging from photos on Google Streetview and from the site sale photographs.
- 1.4 The proposal (450 square metres) is to create a house of 74 square metres, and annexe to the rear of 34.326 square metres, and a tarmac driveway with concrete slab paved paths as appropriate of 303.34629 square metres. The total hard area amounts to 411.67229 square metres, this being the relevant BNG figure. To the rear and west side of the annex is elevated timber decking of 13.168715 square metres with tall herb beneath so technically not at loss, rather a reduction in value.

- 1.5 The project will create (in addition to planters) four vegetated garden areas – the front rectangle of 4.656 square metres, an ornamental hedge strip west of the front path of 3.3927 square metres and an ornamental hedge strip east of the front path of 5.8003 square metres, and a rear garden rectangle of 11.31 square metres. The total area for these is 25.159 square metres, the relevant BNG figure for retained vegetated garden.
- 1.6 In 2024 we examined the site and site photographs dating to the land purchase and to images found on Google Earth (using clock function) to plot the paving and shed, the boat and the two caravans, all of which lay in situ for many years. This allowed us to measure hard developed surfaces and actual vegetated garden with confidence.
- 1.7 David Bentley conducted both surveys. He has been in conservation since 1983 and has been a professional ecologist since 1993.
- 1.8 The CIEEM Guidelines are explicit in what is required to be assessed and provided. These can be found in the earlier planning application ecology report. This can be found at this link: [1 Lister Road Rhodes Ecology Report V2 Dave Bentley.pdf](#)
- 1.5 Completion of the Statutory Metric attached has shown a 98.35% loss in habitats leaving 0.01 unit on site. There were 0.7 baseline units which required a 10% uplift to 0.77 units. We are 0.75 units short (figures from Metric which lose 0.01 habitat units). The developer should show the Metric to a Habitat Bank who will cost the loss and arrange to provide habitats for the developer. If the developer owns land that they themselves can enhance with tree planting, the LPA will explain how they can do this. This will become a legal requirement of the development and the LPA will explain the next steps. Whilst trees, tall forbs and unvegetated garden were lost the development it would be simpler to use tree planting to overcome the deficit.

2 METHODS 2026

- 2.1 A site visit was made by Dave Bentley to examine the ground and to measure with a tape measure various features, especially the soft areas of garden. Photographs were taken.
- 2.2 The photographs from 2024 and from the plot sale documents were compared to examine tree loss and habitat loss in the hedge/tree-line fringe. A species list for the remains of the fringe is given in the earlier report. It is also given below, given it is relevant to the additional habitat loss.

3 RESULTS OF FIELD SURVEY

- 3.1 A Habitat Survey Map of the 2026 layout is appended below.
- 3.2 In 2024 15 higher plant species and 2 moss were recorded along the inner edges of the shuttered building site, alongside the fencelines. Most of these were outside the actual ownership area.

- 3.3 All of the species are common in England and Greater Manchester. None of the species inside the shutter fencing are alien species - none are Schedule 9 Alien Invasives. As the ground has been machine-scraped it is not possible to say what may be in the seed bank. The species lists are given below (D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare, V = Very, L = Locally):

Ivy	O
Stinging Nettle	O
Cow Parsley	R
Herb Robert	O
Broad Buckler Fern	R
Common Male Fern	R
Bindweed (non-flowering)	O
Field Horsetail	O
Bramble	O
Cleavers	R
Common Hogweed	R
Bittersweet	R
Holly sapling	R
Hawthorn sapling	R
Sycamore sapling	VO
Privet sapling	R
<i>Brachythecium rutabulum</i>	O
<i>Kindbergia praelonga</i>	VLF

- 3.4 The treeline/hedge outside the site has:

Sycamore (large tree at south west corner of site which may or may not be in site which still remains in 2026)
 Sycamore (several)
 Ash (large multi-stemmed) and another
 Elder (c2)
 Holly
 Garden Privet
 Hawthorn (c2)
Rhododendron ponticum (Schedule 9 Invasive Alien)
 Hornbeam sapling
 Ivy
 Bramble
 Raspberry
 Stinging Nettle
 Himalayan Balsam VLO near the farm gate SD 84759 04982

In the rear garden of no 3 Lister Road, outside the development, the tree that can be seen in images is a Scots Pine.

- 3.5 By examining site photographs we can see that three Sycamore trees (two clad in Ivy) have been removed to extend the yard area and build the driveway entrance. This is a potential loss to nesting birds and roosting bats which will need mitigating. Medium size Good Condition
- 3.6 The site does not contain any Priority Habitats. The adjacent treeline/hedge could be classed as a Priority Habitat hedgerow on the basis it is native mixed species and once stood in the countryside. The presence of a Schedule 9 Alien Invasive *Rhododendron ponticum* and Himalayan Balsam, both at a single point, shows the condition of this habitat is compromised.
- 3.7 We give advice below on how to destroy the alien invasive species Himalayan Balsam and *Rhododendron ponticum*. This is what the GMEU requested for the earlier consent: "Prior to any earthworks a method statement detailing biosecurity measures for Himalayan Balsam should be supplied to and agreed in writing to the LPA. The agreed method statement shall be adhered to and implemented in full unless otherwise agreed in writing by the LPA."

3.8 **UPDATE ON INVASIVE SPECIES 2026**

The remains of the *Rhododendron* was found at the foot of the slope from the development rear yard. Whilst most is gone some is still alive and flowering (28/04/2026). That area, where the Himalayan Balsam was recorded in 2024, has been tipped with soil from the development and the Himalayan Balsam has spread with now hundreds of small plants crowding the otherwise bare tipped soil at the foot of the slope (see photographs). The developer will need to arrange to kill both species with herbicide. A licenced operative should be brought in to spray the plants in 2026, repeating in late summer 2026 and again in 2027. Nothing should be removed from site as it would be illegal. This will need to be enforced by Planning Conditions.

4 DEVELOPMENT CONSTRAINTS

- 4.1 We have provided a new Full BNG metric which accompanies this report.
- 4.2 No planning condition relating to breeding birds and land CLEARANCE is needed for this new application.
- 4.3 The destruction of the alien invasive plants should be conditioned and carried out as set out above.
- 4.4 The developer has elected not to plant native shrub species and has bought in and planted three sections of *Leylandii* Leyland Cypress hedge. This does not mitigate any ecological impact on the site. No native shrub planting is now proposed by the developer.
- 4.5 The new fencing constructed on the south, west and east sides should incorporate hedgehog passage. The new timber fencing should be modified by removing small piece of wood from the fence base no less than the size of CD box. This needs to be adjusted so as to function correctly as the new fence has a timber footer at the base. The locations are indicated on the architect's plan.
- 4.6 Rochdale LPA may have a policy relating to tree loss and compensation. As three trees have been removed the LPA will need to apply this policy, if they have one.

- 4.7 Due to the loss of tree habitat, ivy-clad tree habitat and tall herb habitat it is necessary to propose the use of bat boxes and bird boxes. The property is now built without swift bricks. So we are proposing the following which will need to be conditioned. NB those chosen are long lasting boxes and not cheap garden ornaments that will fall apart in one season:

4.8 **BAT BOXES**

For Bat boxes a recommended supplier is [greenwoodsecohabitats.co.uk](https://www.greenwoodsecohabitats.co.uk). SIX "SMALL single crevice bat box for trees" should be selected in brown. To fix securely at height increase the number of attachments to cover any eventuality over time (NB only two are supplied in the standard box). Place on south, south-east or south west face of adjacent trees. The boxes need to be ordered in advance as they are made to order.

<https://www.greenwoodsecohabitats.co.uk/shop>

4.9 **SINGLE HOLE BIRD BOXES**

For bird boxes 6 of these long-lasting next boxes should be hung in adjacent trees.:

X 6 Woodstone Neville Nest Box Green (order 3 with hole size 28mm and 3 at hole size 32mm)

https://www.arkwildlife.co.uk/products/woodstone-nest-box?variant=44984516673753&country=GB&gad_source=1&gad_campaignid=17182013905&gbraid=0AAAAAD_f3t4y4Lp2azTuNtJeNkK13HaFn&gclid=Cj0KCQiA5I_NBhDVARIsAOrqlsbnfyfr8A_IkSBixLKO7B6FlzpGB1guq3aYCY57jOuW3kRyAuFVDoaAoG3EALw_wcB

4.10 **HOUSE MARTIN BOXES**

These are durable cup shaped boxes fixed to the walls of houses, under the eaves, away from fixed phone lines, on the northern side of a house to avoid direct sunlight. Again use extra fixings so the hang safely for a long time.

2 total Double Bowl variants fixed to the centre of each house (new house and end terrace house) on the north face of the house under the eaves should be appropriate.

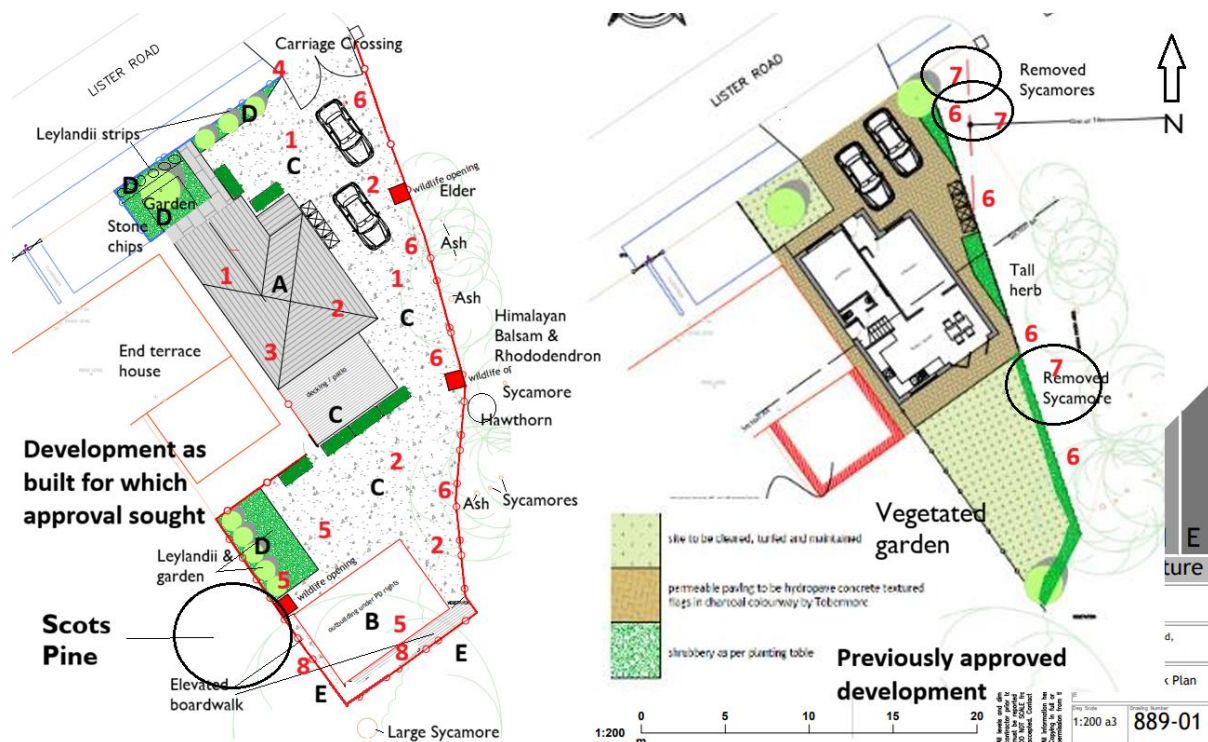
<https://www.arkwildlife.co.uk/products/house-martin-nest-box-bowl?variant=45167676391641>

- 4.11 Biodiversity Net Gain is an additional requirement on top of any other existing or new legal or local policy requirement for nature conservation.

5 **STATEMENT OF MITIGATION HIERARCHY AND BIODIVERSITY NET GAIN AND BIODIVERSITY GAIN PLAN**

- 5.1 There are no area-based Priority Habitats and no Sites of Biological Importance on or adjacent the site, the site is not in a wildlife corridor though is adjacent one (whether designated or not), and there are no Irreplaceable Habitats.
- 5.2 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.

- 5.3 It is not possible to AVOID without scrapping the development. To mitigate the impact on biodiversity we have proposed measures for birds and Hedgehogs the LPA may condition what is set out in this Ecology Report. We have suggested Hedgehog passes are used and the LPA will need to condition them. We have proposed the placement of bird boxes, House Martin boxes and bat boxes. The LPA will need to condition these and ensure the condition is complied with.
- 5.4 Completion of the Statutory Metric attached has shown a 98.35% loss in habitats leaving 0.01 unit on site. There were 0.7 baseline units which required a 10% uplift to 0.77 units. We are 0.75 units short (figures from Metric which lose 0.01 habitat units). The developer should show the Metric to a Habitat Bank who will cost the loss and arrange to provide habitats for the developer. If the developer owns land that they themselves can enhance with tree planting, the LPA will explain how they can do this. This will become a legal requirement of the development and the LPA will explain the next steps. Whilst trees, tall forbs and unvegetated garden were lost the development it would be simpler to use tree planting to overcome the deficit.



Existing site as built 2026 (above)

Plans from 2024 (above)



The site (above) after clearance and removal of 3 trees





Rear garden of end terrace house in 2024 (above)
Scots Pine in garden next door still present.



Composite image of new soil and spreading Himalayan Balsam 2026 (above)



Himalayan Balsam locations (above) red arrows (2024)



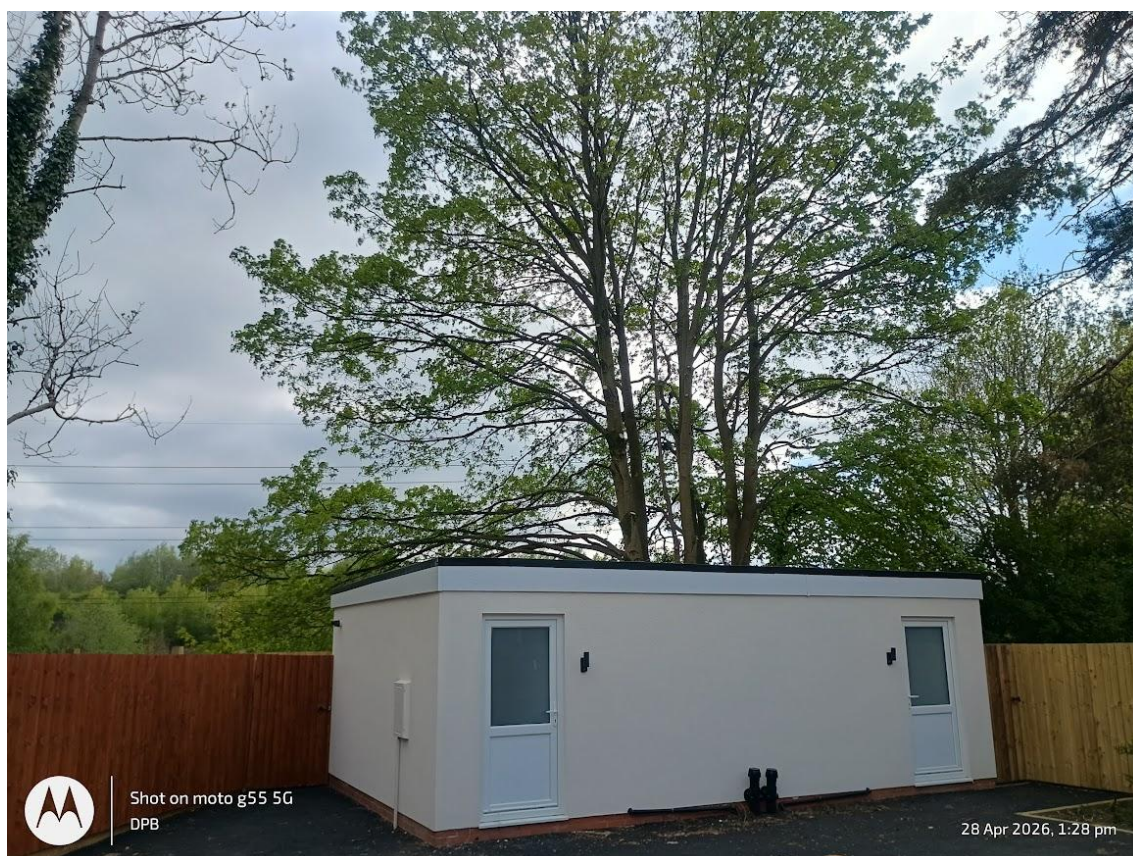
New front garden to new house (above)



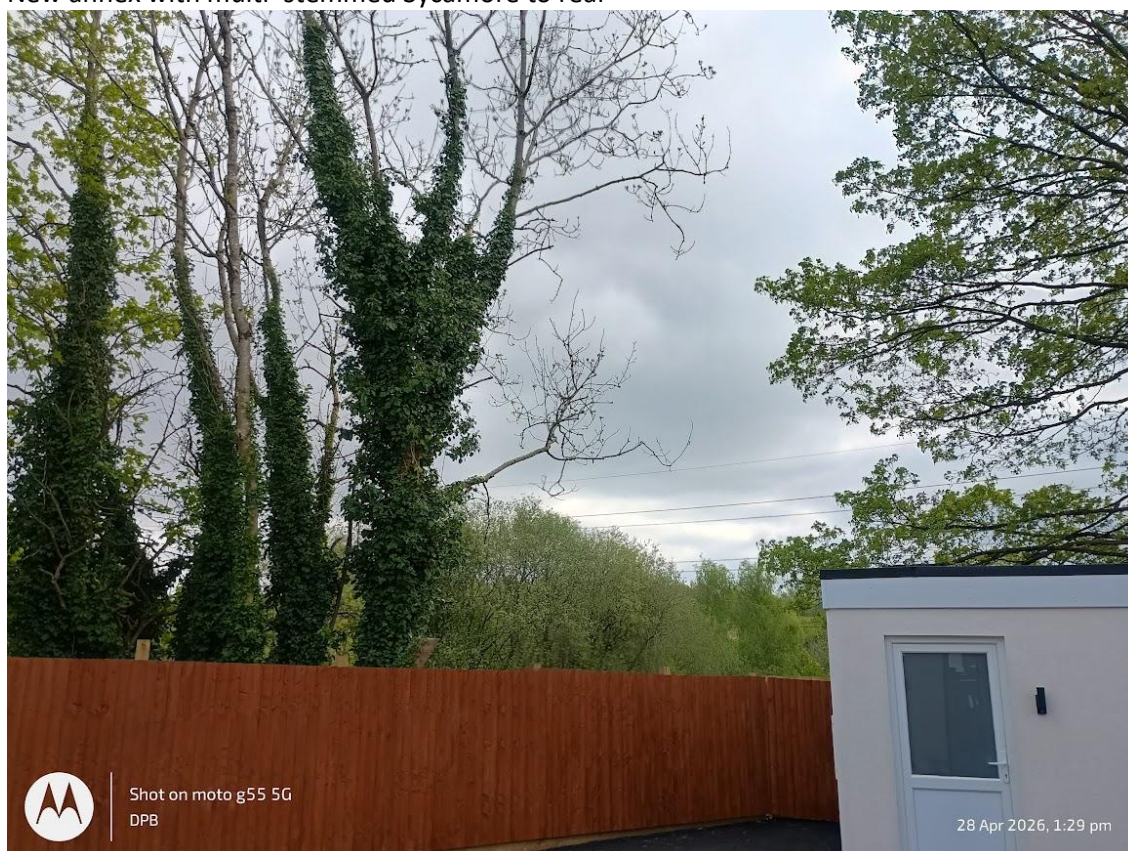
New Leylandii hedges and garden strips (above)



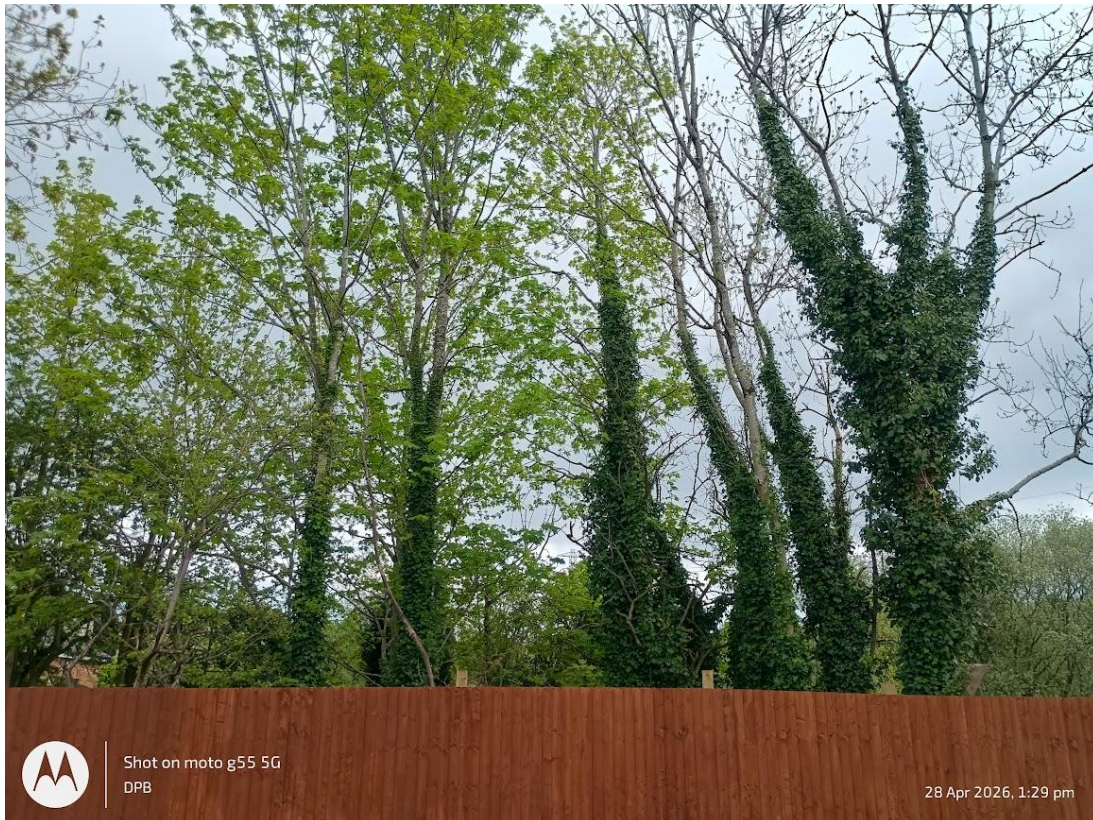
New rear vegetated garden and Leylandii hedge (rear of end terrace)(above)



New annex with multi-stemmed Sycamore to rear



Tree line (south part) (above)



Tree line (middle part) (above)



Tree line (north part) (above)

CONDITION ASSESSMENT FOR EASTERN TALL HERB STRIP IN 2024

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			
See the Statutory Biodiversity Metric User Guide for green roofs and UK Habitat Classification (UKHab) for other habitats:			UKHab – UK Habitat Classification
On-site or off-site, site name and location	1 Lister Road, Rhodes, Middleton	Survey date and Surveyor name	Dave Bentley 18/6/2024 and 28/4/2026
Limitations (if applicable)		Survey reference (if relating to a wider survey)	
Grid reference		Habitat parcel reference	Tall forb adjacent hedgerow/treeline
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.	Yes	See species list of surviving recorded species in report.
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	See species list of surviving recorded species in report.
C	Invasive non-native plant species (listed on Schedule 9 of WCA¹) and others which are to the detriment of native wildlife (using professional judgement)² cover less than 5% of the total vegetated area³. Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Yes.	Yes. Himalayan Balsam nearby as small patch but not known to have been in parcel
Additional Criterion - must be assessed for Open mosaic habitat on previously developed land only:			
D	The parcel shows spatial variation and forms a mosaic of bare substrate PLUS: - At least four early successional communities (a) to (i); Communities: (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland, (i) pools.	NA	
Additional Criteria - must be assessed for Bioswale and SuDS habitat types only:			

E1	Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife ⁴ .	NA	
E2	The vegetation is comprised of plant species suited to wetland or riparian situations.		
Additional Criterion - must be assessed for Intensive green roofs only:			
F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation (including water features).	NA	
Additional Criterion - must be assessed for Biodiverse green roofs only:			
G	The roof has a varied depth of 80 – 150 mm; at least 50% is at 150 mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. Note – to achieve Good condition some additional habitat, such as sand piles, stones, logs etc. are present.	NA	
Essential criteria relevant for habitat type achieved (Yes or No)			
Number of criteria passed			
Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓	
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)	Yes	
• 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)		

• Passes 0 or 1 of 3 core criteria.	Poor (1)	
Results for Green roofs and Open mosaic habitat on previously developed land (requiring assessment of 4 criteria only - core criteria plus additional criterion specified for habitat type):		
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes additional criterion relevant to specific habitat type (D, F or G).	Good (3)	NA
• Passes 2 or 3 of 4 criteria; OR • Passes 4 of 4 criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	
• Passes 0 or 1 of 4 criteria.	Poor (1)	
Results for Bioswale or SuDS (requiring assessment of 5 criteria - core criteria plus additional criteria specified for habitat type):		
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes all additional criteria relevant to specific habitat type (Group E)	Good (3)	NA
• Passes 3 or 4 of 5 criteria; OR • Passes 5 of 5 criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	
• Passes 2 or fewer of 5 criteria.	Poor (1)	
Suggested enhancement interventions to improve condition score		
Mostly under a new fence and tarmac. It is not hard to achieve good condition status.		
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 *Buddleja davidii* 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: [Alternative plants » NNSS](#) (nonnativespecies.org)

CONDITION ASSESSMENT FOR THREE REMOVED SYCAMORE TREES

Condition Sheet: INDIVIDUAL TREES Habitat Type

Habitat Types

Individual trees – Urban trees

Individual trees – Rural trees

Complete a condition sheet for each tree or block of trees.

Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.

Habitat Description

Three Sycamore trees, judged fairly at Medium sized, two with dense Ivy

Individual trees (description applied to the urban or rural environment):

Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.

Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):

Groups or stands of trees (size requirement as defined above) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously. Groups of urban trees that don't match the descriptions for woodland may be assessed within this category.

On-site or off-site, site name and location	1 Lister Road Rhodes Middleton Rochdale District 2026 application	Survey date and Surveyor name	Dave Bentley . Used photographs.
Limitations (if applicable)	Tree removed so used photographs	Survey reference (if relating to a wider survey)	
Grid reference	SD 8475 0499	Habitat parcel reference	
Condition Assessment Criteria		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).	No	Sycamore " be treated as an archaeophyte" according to UK Hab.
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).	Yes	All part of a treeline
C	The tree is mature (or more than 50% within the block are mature) ¹ .	Yes	
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.	Yes	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Yes Ivy on 2 of three	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	

Number of criteria passed			
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved ×/✓	
Passes 5 or 6 criteria	Good (3)	Yes	
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 score ²			
Tree have been removed. Due to their removal Condition would be enhanced to Good Condition, but the trees achieve that in any case.			
Footnotes			
Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from: Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk) and: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.			