



GEO-ENVIRONMENTAL CONSULTING

BEK Geo-Environmental Consulting

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Biodiversity Net Gain Feasibility Report - 208 Drake St, Rochdale

SUMMARY

A Biodiversity Net Gain (BNG) baseline calculation is required to meet National Planning Policy Framework (*NPPF, 180(d), 2023*).

A site survey was carried out on 02.02.2026 to determine the baseline habitats, and undertake a Preliminary Ecological Appraisal (PEA). There were no signs of protected species on the site, but habitat for breeding birds and small mammals was present in the form of scrub.

The Statutory Biodiversity Metric (issued 23.07.2024) was used to calculate the baseline and potential proposed habitats on the site.

Using the Statutory Biodiversity Metric Calculation tool, the development shows a baseline habitat unit total of 1.37 hu.

Proposals:

- Multi-unit residential development with associated access and landscaping.

Biodiversity Net Gain Calculation:

- The proposals will not achieve any Biodiversity Net Gain and off-site credits will be purchased to achieve the required 10% Net Gain.
- See calculation below from the Statutory Metric Calculator Tool:



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Area habitat summary	
Total Net Unit Change	-0.86
Total Net % Change	-63.16%
Trading Rules Satisfied	No - check trading summaries ▲
Area Check	Area Acceptable ✓

Credits Required by Tier/Module	
Tier	Credits Required
A1	2.73 ▲
A2	0.00
A3	0.00
A4	0.00
A5	0.00
H	0.00
W	0.00

INTRODUCTION

Background

An evaluation was necessary to ascertain the potential Biodiversity Net Gain of the site at 206 – 208 Drake St, Rochdale OL16 1PF. This assessment was conducted to support a planning application for a residential development, with associated access and landscaping.

Scope of the Report

The assessment takes into consideration the local and national planning policy and strategy relevant to the site, the baseline ecological condition of the site, the proposed development plans and the enhancement plan, and aims to meet the requirements of The National Planning Policy Framework (2023) and standards set in the CIEEM/CIRIA *Biodiversity Net Gain. Good Practice Principles for development a practical guide*.

METHODOLOGY

Desk and Field Study Methods

- Habitats are described using the UK Habitat Classification System methods and codes (converted from JNCC Phase 1 codes where necessary), and condition assessed according to the Statutory Biodiversity Metric Auditing and Accounting for Biodiversity Condition Assessment Sheets.



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- Areas were measured both on-site and online using Google Earth and Open Street Map through QGIS, and dimensions provided by the client from their landscape plans.
- A site survey was carried out on 02.02.2026.
- Surveys and assessment were carried out by C Edmondson MSc MRSB, consultant ecologist with 12yrs field survey experience and Natural England Class 2 bat licence holder.
- Survey methods used follow the UKHab V2.1 guidelines for habitat survey.

Limitations

The habitat survey was carried out early season for most plant growth. However, the experience of the surveyor and lack of site management compensate for this limitation.

Approach to BNG

BNG Principles: BNG is achieved through 10 principles, the first of which is the Mitigation Hierarchy. This Hierarchy will be followed at each stage of the development.

The DEFRA Statutory Biodiversity Net Gain Metric was used to:

- Assess the biodiversity unit value of an area of land.
- Demonstrate biodiversity net gains or losses in a consistent way.
- Measure and account for direct impacts on biodiversity.
- Compare proposals for the site - such as creating or enhancing habitat on-site or off-site.
- Assess existing habitats and planned new habitats created by a development or land change.

BNG Urban tree helper was used to calculate the unit value of any individual trees present on site and post development where appropriate.

BASELINE SITE CONDITIONS

Site Description

The site of the proposed development is an area of approx. .38ha comprising mainly of self-seeded non-native scrub of varying density across the site. Some areas of hard standing have not yet become overgrown.

The wall to the north boundary with the road has a heavy ivy covering. A full site description, photos and species lists included in the Preliminary Ecological Appraisal (*BEK, March 2025*)

Important Ecological Features:

No Priority habitats or mature/veteran trees were present on the site.

Baseline Biodiversity Metric Calculations

Using the Statutory Biodiversity Metric Calculation tool, the development shows a baseline habitat unit total of 1.37 hu.

Table 1 below shows the breakdown of habitat areas and units.

A full Habitat Baseline Plan is included at Annex 2. Proposals plan at Annex 3.

Table 1: Habitats at Baseline Calculation

Ref	Habitat description	Code (UKHABS)	Area ha/length/no.	BNG units
BH1	Developed land; sealed surface	u1b	0.0414	0.00
BH2/3	Mixed Scrub – non-native, some scattered	h3h, 13, 16, 518, 523	0.3413	1.37

BNG GOOD PRACTICE PRINCIPLES FOR DEVELOPMENT

BNG is achieved through 10 principles, the first of which is the Mitigation Hierarchy. This Hierarchy will be followed at each stage of development, through the measures at Table 2.

Principle 1: Mitigation Hierarchy

- 1: Avoid Biodiversity Loss e.g. Finding alternative sites, changing development plans etc
- 2: Minimise any loss
- 3: Mitigate for any loss
- 4: Compensate

Table 2: Hierarchy Measures

1: Avoidance 'Measures taken to anticipate and prevent adverse impacts on biodiversity before actions or decisions are taken that could lead to such impacts'.	Measures to avoid pollution will be implemented according to current EA Pollution Prevention Guidance. Site clearance carried out under a "Reasonable Avoidance Measures" Method statement.
2. Minimise	Containing the development footprint to avoid impacting the wider area.
3. Mitigation	Buying off-site BNG credits
4. Compensation	Replacing lost trees with new tree planting

Principle 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 these proposals

Principle 3: Be Inclusive and Equitable

Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Biodiversity Net Gain. Achieve net gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.

Principle 4: Address Risk

- This is addressed within the metric and methodology set out within this document.

Principle 5: Make a measurable Net Gain Achievement

- This will be achieved through the purchase of off-site credits.

Principle 6: Achieve the best outcomes for biodiversity:

- Including flowering lawn seed mix for community spaces.

Principle 7: Be additional:

- Aiming to achieve over the 10% Statutory Biodiversity Net Gain.

Principle 8: Create a Net Gain legacy:

- Management of grassy areas to maintain appropriate condition.

Principle 9: Optimise sustainability & prioritise biodiversity:

- By implementing the enhancements in the landscaping plan.

Principle 10: Be transparent:

- Communicate all Biodiversity Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

PROPOSED DESIGN & BNG FEASIBILITY

The Site proposals include residential units, with associated access and landscaping.

Biodiversity Net Gain proposals:

- The site will be divided between built areas, some private garden and some shared communal green spaces.
- The proposals will not achieve any Biodiversity Net Gain and off-site credits will be purchased to achieve the required 10% Net Gain.

The following assumptions have been made regarding this calculation:

- **Proposals only**, the final location of new habitats will be included in the full landscape plan & BNG units secured as condition of the LPA decision.
- All hard landscaping areas have been aggregated (all 0 habitat units).
- The area measurements below are taken from Paddock Johnson drawing no. 19146-PJA-00-ZZ-DR-A-1200-K

Table 3: Habitats Enhanced/Created

Created On-site Features:	Code (UKHab)	Area ha/length/no.
Developed land, sealed surface including buildings, access and pathways	u1b	0.1913
Artificial, unsealed, non-vegetated surfaces (car parking spaces)	u1b	0.03
Vegetated garden (under private management)	u1	0.0207
Modified grassland, moderate condition- seeded with flowering lawn species (outside private gardens).	g4	0.0457
Trees planted (outside private gardens)		12no.
Non-native shrub beds (outside private gardens)	u	0.0468
SUDS/Bioswale	u1	0.05
Hedging native– total length (only hedging under full control of the developer).	h2a	29.011metres
Hedging non-native– total length (only hedging under full control of the developer).	h2b	178metres

BIODIVERSITY NET GAIN CALCULATION

- The proposals will not achieve any Biodiversity Net Gain and off-site credits will be purchased to achieve the required 10% Net Gain.
- See calculation below from the Statutory Metric Calculator Tool.

Area habitat summary	
Total Net Unit Change	-0.86
Total Net % Change	-63.16%
Trading Rules Satisfied	No - check trading summaries ▲
Area Check	Area Acceptable ✓

Credits Required by Tier/Module	
Tier	Credits Required
A1	2.73 ▲
A2	0.00
A3	0.00
A4	0.00
A5	0.00
H	0.00
W	0.00

REFERENCES

- CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK.
- CIEEM (2016) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
http://www.cieem.net/data/files/Publications/EcIA_Guidelines_Terrestrial_Freshwater_and_Coastal_Jan_2016.pdf
- CIEEM (2013) Guidelines for Preliminary Ecological Appraisal Institute of Ecology and Environmental Management
http://www.cieem.net/data/files/Resource_Library/Technical_Guidance_Series/GPEA/GPEA_April_2013.pdf
- CIEEM, CIRIA, IEMA (2019) Biodiversity net gain. Good practice principles for development. A practical guide. CIRIA C776a. London, 2019.
- National Planning Policy Framework, 2023
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF/2023.pdf

ANNEX 1

BNG Metric Headline Results Output V.2

204 - 208 Drake Street

Headline Results

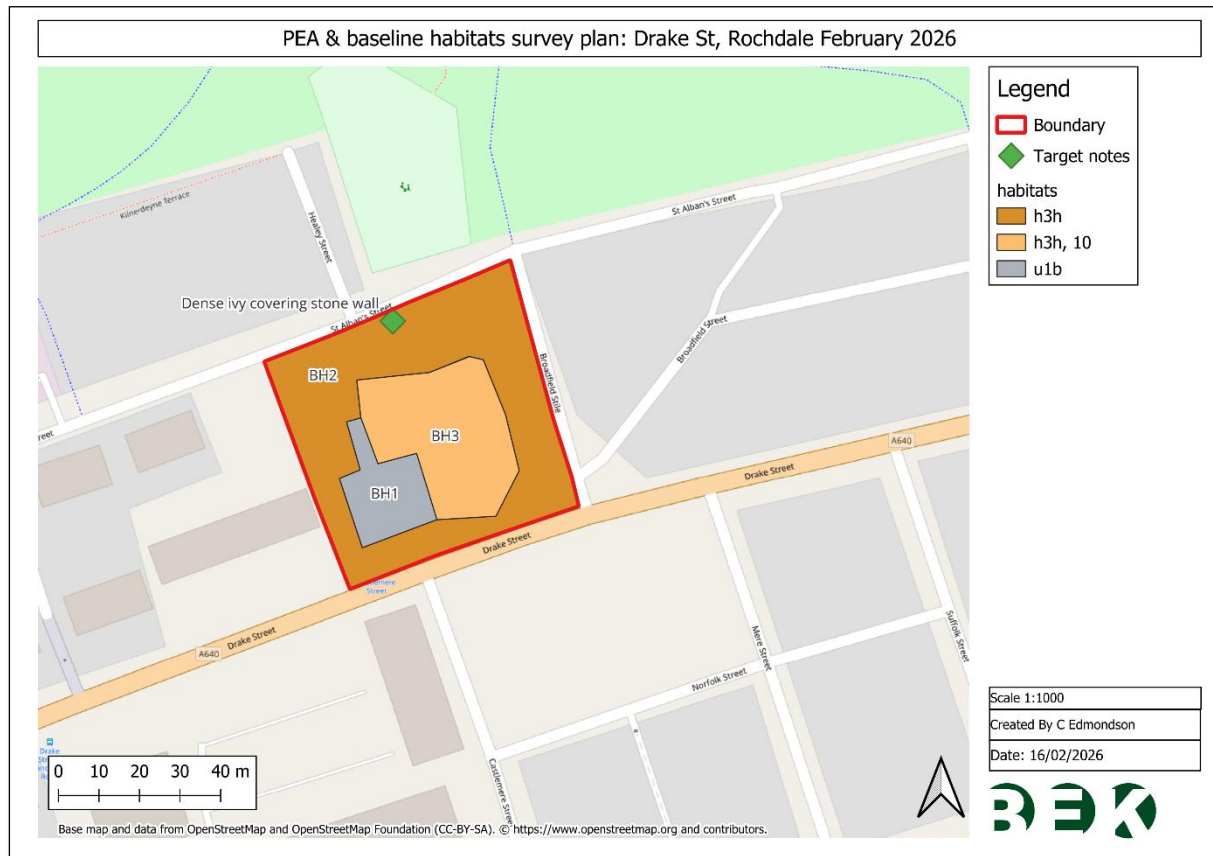
Scroll down for final results ▲

Return to results menu

On-site baseline	Area habitat units	1.37		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.50		
	Hedgerow units	0.02		
	Watercourse units	0.00		
On-site net change (units & percentage)	Area habitat units	-0.86	-63.16%	On-site net gain is less than target set ▲ Zero baseline units - % cannot be calculated
	Hedgerow units	0.02	N/A	
	Watercourse units	0.00	0.00%	
Off-site baseline	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	Area 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)	Area habitat units	-0.86		
	Hedgerow units	0.02		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Area 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)	Area habitat units	-0.86		
	Hedgerow units	0.02		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-63.16%	Total net gain achieved is less than target set ▲	
	Hedgerow units	N/A	0 baseline units - % cannot be calculated	
	Watercourse units	0.00%		
Trading rules satisfied?	No - Check Trading Summaries ▲			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	1.37	1.50	1.00
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00
No additional hedgerow units required to meet target ✓				
No additional watercourse units required to meet target ✓				

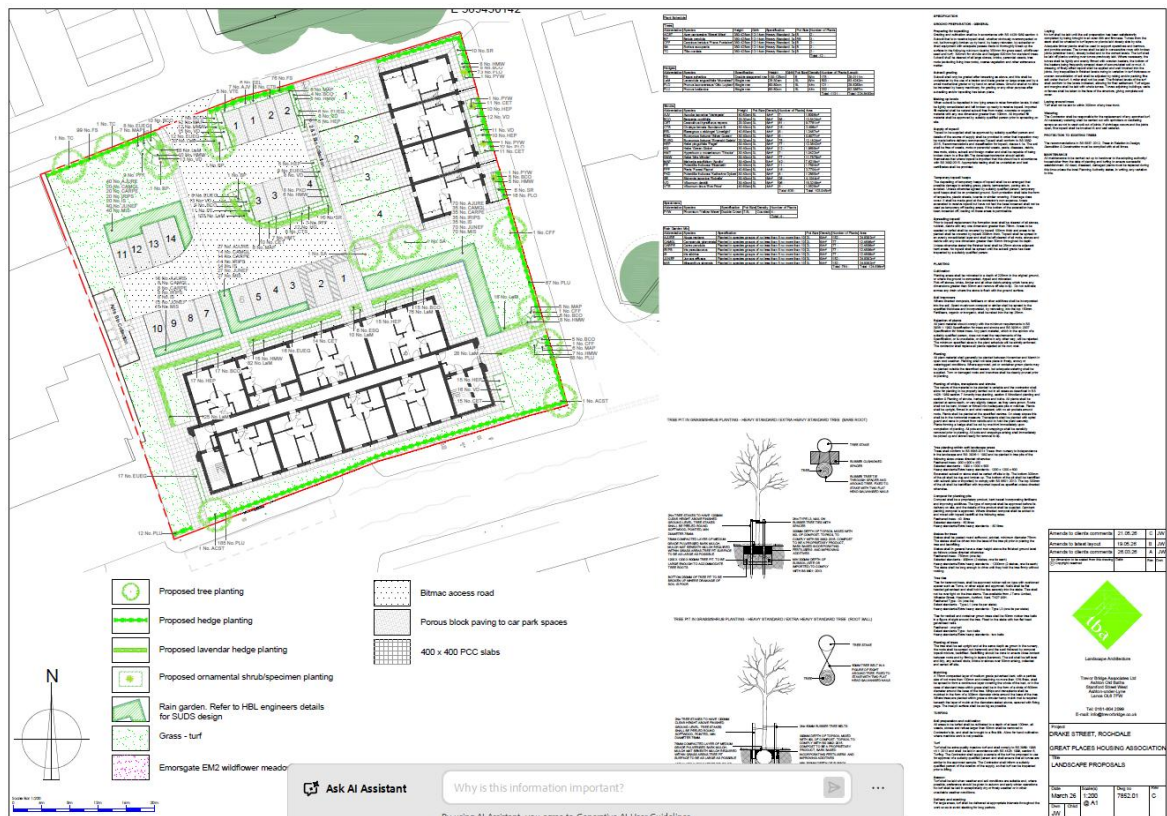
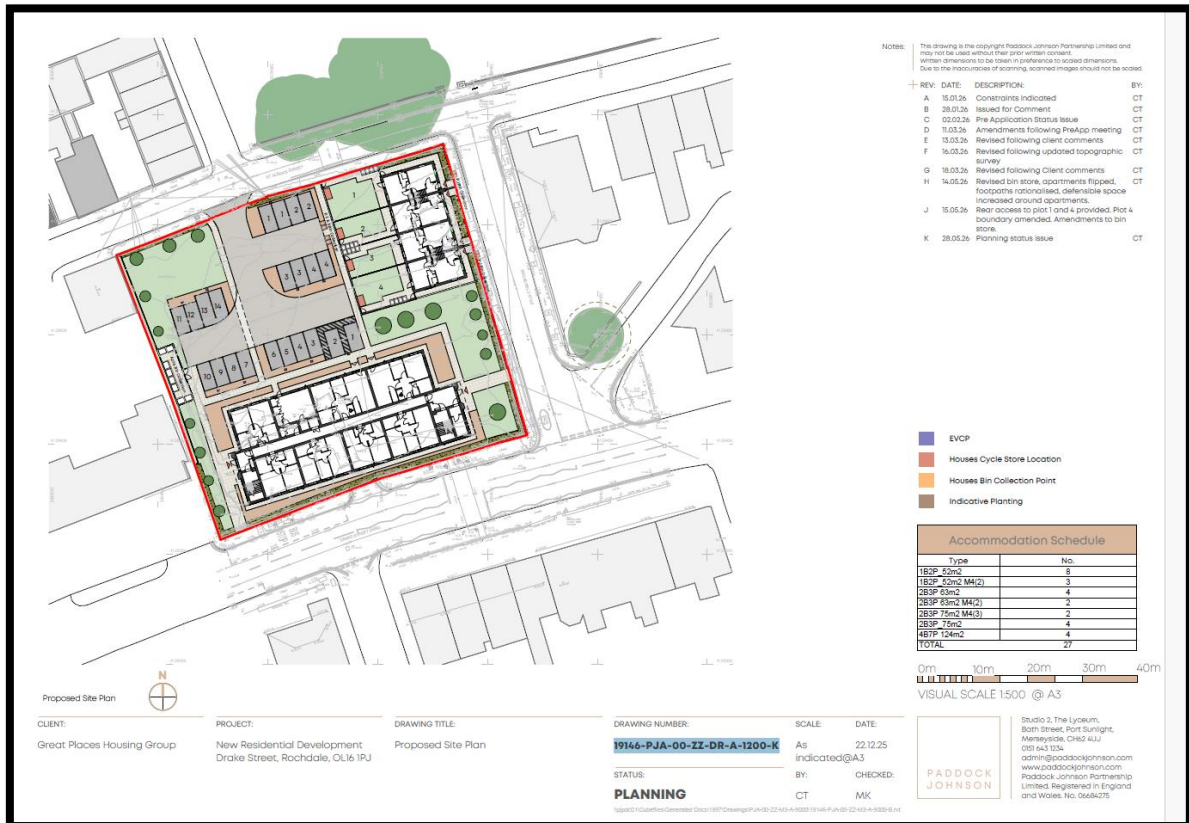
ANNEX 2

Baseline Habitats Plan



ANNEX 3

Proposed Plan



ANNEX 4

Condition Assessments

Condition Sheet: SCRUB Habitat Type													
Habitat Types													
Heathland and shrub - Blackthorn scrub													
Heathland and shrub - Gorse scrub													
Heathland and shrub - Hawthorn scrub													
Heathland and shrub - Hazel scrub													
Heathland and shrub - Mixed scrub													
Heathland and shrub - Dunes with sea buckthorn (H2160)													
Heathland and shrub - Willow scrub													
Habitat Description													
For Dunes with sea buckthorn see: Dunes with sea-buckthorn (Dunes with Hippophae rhamnoides) - Special Areas of Conservation (jncc.gov.uk)													
For other scrub types see: ukhab – UK Habitat Classification													
On-site or off-site, site name and location			Survey date and Surveyor name										
			Survey reference (if relating to a wider survey)										
Limitations (if applicable)			Habitat parcel reference										
			30655 253 - Dense and										
Condition Assessment Criteria			Grid reference										Notes (such as justification)
			SD 89432 12859										
			Criterion passed (Yes or No)										
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). ¹ - At least 80% of scrub is native, - There are at least three native woody species ² , - No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> (only in its restricted native range), or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	No											
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran ³) shrubs are all present.	No											
C	There is an absence of invasive non-native plant species ⁴ (as listed on Schedule 9 of WCA ⁵) and species indicative of suboptimal condition ⁶ make up less than 5% of ground cover.	No											
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Yes											
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Yes											
Number of criteria passed			2										
Condition Assessment Result (out of 5 criteria)		Condition Assessment Score	Score Achieved x/√										
Passes 5 criteria		Good (3)											
Passes 3 or 4 criteria		Moderate (2)											
Passes 2 or fewer criteria		Poor (1)	Yes										
Suggested enhancement interventions to improve condition score													
Footnotes													
Footnote 1 – Professional judgement should be used alongside the UKHab description.													
Footnote 2 – Native woody species as defined and listed in the Hedgerow Survey Handbook: DEFRA (2007) <i>Hedgerow Survey Handbook: A standard procedure for local surveys in the UK</i> . 2nd ed. [online]. Defra, London. PB1195. Available from: Hedgerow Survey Handbook (publishing.service.gov.uk).													
Footnote 3 – See gov.uk standing advice on ancient and veteran species. 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 4 – 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 5 – Wildlife and Countryside Act 1981 (as amended).													
Footnote 6 – Species indicative of suboptimal condition for this habitat type may include: non-native conifers, tree-of-heaven <i>Alnus altissima</i> , holm oak <i>Quercus ilex</i> , European turkey oak <i>Quercus cerris</i> , cherry laurel <i>Prunus laurocerasus</i> , snowberry <i>Symphoricarpos</i> spp., shallon <i>Gaultheria shallon</i> , American skunk cabbage <i>Lysichiton americanus</i> , buddleia <i>Buddleja</i> spp., cotoneaster <i>Cotoneaster</i> spp., Spanish bluebell <i>Hyacinthoides hispanica</i> and hybrid bluebells <i>Hyacinthoides x massartiana</i> . There may be additional relevant species local to the region and or site.													