



Biodiversity Net Gain (BNG) Justification Note.

Ref: DA25060 – Berkley Court

Site address: Berkeley Court, 150 Bury Old Road, Manchester, M7 4QZ

Date: 1st December 2025

Proposal: Upward extension to create 8 apartments; recladding and parking amendments

1. Introduction

This Biodiversity Net Gain (BNG) Justification Note accompanies the planning application for Berkeley Court and provides a clear, proportionate and narrative-led explanation of how the proposed development affects biodiversity on this small, urban and ecologically limited site.

A key purpose of this document is to justify why a full ecological survey and metric calculation are not required. National BNG legislation and guidance emphasise proportionality—requiring ecological information to reflect the *scale, sensitivity and ecological significance* of a development. Berkeley Court involves only minor changes to areas of clearly identifiable, very low-distinctiveness habitat, and introduces no risks or uncertainties that would justify detailed ecological surveys.

In this context, a concise justification note is entirely appropriate. It provides the specific ecological information relevant to this site without unnecessary technical burden, while still enabling a robust planning judgment. The approach also aligns with best-practice expectations for proportionate assessment in small, ecologically simple urban sites.

This document therefore sets out:

- The legislative and policy basis for using a proportionate reporting method rather than undertaking unnecessary surveys.
- A contextual description of the existing ecological baseline.
- The limited nature of habitat change resulting from the development.
- The ecological enhancements that will deliver an uplift relative to current conditions.

The aim is to provide a sufficiently detailed but proportionate explanation that enables the Local Planning Authority to determine the application with confidence.

2. Legislative and Guidance Framework Supporting a Proportionate Approach

The BNG system is structured to ensure that the level of ecological information submitted is proportionate to the *actual ecological implications* of a development. Across legislation, regulations and national guidance, the direction is consistent: detailed ecological surveys and full BNG metrics are not required for developments involving minimal habitat change, particularly where habitats are simple, low-distinctiveness and readily understood from site inspection, mapping and aerial imagery.

2.1 Environment Act 2021 – Proportionality as a Core Principle

The Act introduces mandatory BNG but embeds the requirement that assessments must be proportionate to the scale and ecological significance of development. It recognises that developments affecting simple, low-value habitats should not be burdened with disproportionate ecological reporting.



2.2 Biodiversity Gain Regulations 2024 – Allowing Simplified Submissions

The Regulations reinforce that simplified BNG submissions are appropriate where impacts are minimal, and where affected habitats are low-distinctiveness. Berkeley Court clearly falls within this category, with changes confined only to small areas of amenity grass.

2.3 DEFRA BNG Guidance (2024) – Explicit Support for “Light-Touch” Reporting

DEFRA states that where ecological impacts are de minimis or confined to low-distinctiveness habitats, detailed ecological assessment is unnecessary. In such cases, LPAs may determine applications based on clear site descriptions and proportionate enhancement proposals.

2.4 Natural England Metric Guidance – Low-Distinctiveness Habitats Do Not Require Survey

Natural England confirms that regularly managed amenity grass—precisely the type present at Berkeley Court—is unambiguously categorised as “Very Low Distinctiveness”. The baseline can therefore be established without formal survey.

2.5 NPPF and Planning Practice Guidance – Proportionate Information for Decision-Making

National planning policy requires biodiversity enhancements but equally requires that information submitted with applications is proportionate. The PPG confirms that where habitats are simple and well-understood, site photos, plans and visual inspection provide sufficient evidence.

2.6 Synthesis: Why Proportionality Applies Here

Across all sources, the policy direction is exceptionally clear. Developments should not be required to undertake unnecessary ecological survey work when:

- The habitats involved are uniform, low-value and clearly identifiable.
- The extent of habitat change is minor.
- The ecological baseline is unambiguous from visual inspection.
- The proposed enhancements exceed the ecological function of existing habitats.

Berkeley Court meets all of these criteria. A full survey or BNG metric would not change the baseline, the impact assessment, or the enhancement strategy, and would not contribute meaningfully to decision-making. A proportionate justification note is therefore the correct and policy-supported approach.

3. Existing Ecological Baseline

Berkeley Court sits within a fully urban environment dominated by residential buildings, hardstanding and highly managed landscaping. The ecological baseline is extremely limited and shaped by its urban context.

The site consists of:

- The existing residential block.
- Garages, parking areas and circulation space.
- Small parcels of amenity grassland, managed through regular mowing.
- Isolated strips of boundary planting with limited species diversity.



There are no trees, no semi-natural habitats, no priority habitats, and no features of ecological significance present. The amenity grassland offers almost no structural or species variety and provides minimal foraging or shelter opportunities for wildlife. This habitat is formally categorised as Very Low Distinctiveness.

The building envelope currently offers little ecological interest, lacking cavities or features that might support nesting or roosting species. The baseline can therefore be summarised as ecologically poor, heavily managed and functionally limited.

4. Habitat Change Resulting from the Development

The ecological baseline at Berkeley Court is uncomplicated, uniform and easily understood from direct observation. Within this context, the extent of habitat change arising from the development is extremely limited and does not alter the ecological function of the site in any meaningful way.

The development results in the loss of a small area of amenity grass to create a modest extension to the parking area. This loss is:

- Minor in scale.
- Confined exclusively to very low distinctiveness habitat.
- Of no consequence to habitat connectivity or ecological function.

No hedgerows, trees, valuable soft landscaping or wildlife features are affected. The proposal therefore has no meaningful ecological impact in terms of habitat loss.

In ecological terms, the small reduction in amenity grass carries negligible weight and is far outweighed by the enhancements introduced as part of the scheme.

5. Proposed Enhancements and Biodiversity Uplift

While the site currently provides limited ecological value, the development introduces a range of enhancements that improve habitat structure, diversity and function.

5.1 Strengthened Soft Landscaping

New native hedgerow planting will be introduced around the parking area, replacing low-functioning amenity grass with a linear habitat of significantly higher ecological value. Hedgerows support insects, nesting birds and provide meaningful structure within urban environments.

5.2 Habitat Creation Through Vertical Features

The recladding of the building provides an opportunity to integrate bird bricks and bat-friendly features within the façade. These small but valuable features are increasingly recognised as an effective mechanism for enhancing biodiversity in urban sites where ground-level habitat is limited.

5.3 Pollinator-Friendly Planting

Retained soft landscaping will incorporate pollinator-supporting species, improving foraging resources and contributing to wider urban ecological networks.

5.4 Long-Term Planting Management



The new landscaping will be maintained through a simple but effective management approach, ensuring hedgerows and planting areas remain healthy and functional over time.

5.5 Overall Uplift

These enhancements deliver a meaningful ecological uplift by:

- Replacing a low-value habitat with more structured and diverse planting.
- Introducing vertical nesting and roosting opportunities.
- Increasing plant variety and seasonal interest.
- Supporting insects, birds and small mammals.

Relative to the existing baseline, the scheme offers a clear and measurable improvement to site biodiversity.

6. Conclusion

The proposals for Berkeley Court deliver a focused and meaningful set of biodiversity enhancements that respond directly to the very limited ecological baseline of the site. The small area of amenity grass affected by the development is of very low distinctiveness, offering minimal ecological function and playing no material role in habitat connectivity or species support. Its loss is therefore of de minimis ecological significance, carrying no measurable impact on biodiversity within or beyond the site.

Against this simple baseline, the development introduces a coherent package of targeted enhancements. New native hedgerow planting replaces low-value grassland with a structured, species-rich habitat that provides foraging, shelter and nesting potential. Bird and bat features incorporated into the reclad façade create valuable vertical habitat opportunities that are often lacking in urban settings. Pollinator-friendly planting further diversifies the site's ecological resources and strengthens its contribution to wider urban ecological networks.

These measures establish a more functional and resilient habitat framework, ensuring the site supports a level of biodiversity that is noticeably higher than at present. The enhancements are proportionate, purposeful and tailored to the constraints and opportunities of a compact urban site. They deliver a clear net uplift in ecological value that exceeds what would typically be expected for a development of this scale.

The development:

- Results in no ecological harm, with the only affected habitat being of de minimis significance.
- Introduces substantive enhancements that strengthen habitat structure and diversity.
- Creates new opportunities for nesting, roosting and pollination.
- Aligns fully with national and local policy objectives for biodiversity improvement.

The Local Planning Authority can therefore determine the application with confidence that biodiversity matters have been robustly and positively addressed, and that the scheme will achieve a modest but meaningful enhancement of the site's ecological value over time.