



Biodiversity Net Gain Report

Land off Fog Lane, Manchester

May 2025



Styles Ecology Ltd



Prepared for: Dalcour Maclaren

Survey date: 26th June 2024

Version	Purpose	Originator	Authorised	Date
00	For client comment	Jonathan Pescod & Daniel Burrows	Joshua Styles	22 nd July 2024
01	For client comment	Jonathan Pescod & Daniel Burrows	Joshua Styles	9 th August 2024
02	For client comment	Jonathan Pescod & Daniel Burrows	Joshua Styles	16 th April 2025
03	For client comment	Jonathan Pescod & Daniel Burrows	Joshua Styles	12 th May 2025
04	For issue	Jonathan Pescod & Daniel Burrows	Joshua Styles	26 th May 2025

Notice

This report has been prepared by Styles Ecology Ltd, with all reasonable care, skill and diligence within the terms of the contract with the client and with due regard to available best-practice guidance. The contents contained within this report must not be copied or reproduced without the express permission of Styles Ecology Ltd. This is with the exception for the collection of biological records data which may be gathered by the Local Records Centre and other recording groups as appropriate.

This document has been prepared by a botanical specialist and does not purport to provide legal advice.

Styles Ecology Ltd is registered in England and Wales under Company Number 15229405 and its registered office is situated at 47 Langshaw Lea, Liverpool, L27 4YE.



Table of Contents

1.0 Introduction	4
2.0 The Statutory Biodiversity Metric tool	9
3.0 Limitations.....	12
4.0 Habitat survey	13
5.0 Conclusions & recommendations	15
Appendix I – Condition assessment tables	17
Appendix II – Baseline habitats plan	19
Appendix III – Post-development plan	20



1.0 Introduction

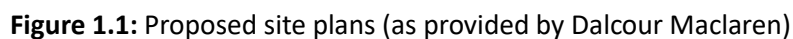
1.1 As part of a proposed planning application with Manchester City Council concerning a plot of land at Fog Lane Park in Manchester, Styles Ecology Ltd were commissioned to carry out a Preliminary Ecological Appraisal (PEA) and Biodiversity Net-gain (BNG) Assessment by Dalcour Maclaren.

1.2 Proposals are understood to involve the erection of a new gas governor kiosk with associated parking and fencing; existing access from Parkville Road to the north is to be retained. See **Figure 1.1** below for a proposed site plan with red line boundary and temporary access/construction area and Figure 1.2 for the existing access track to be retained.

1.3 This BNG Assessment relies on third-party information gathered during the baseline assessment as well as from plans associated with the scheme (see **section 2.7** of this report for key third-party data sources).

1.4 As part of the Local Planning Authorities (LPA) planning policies and obligations to the Planning Framework, ecological surveys are generally required prior to planning permission being granted, particularly where protected / priority habitats or species are, or may be present, that could be affected by the proposals for which the application seeks consent.

1.5 This assessment uses the Statutory Biodiversity Metric as this tool is the most appropriate metric for the proposed scheme versus alternatives available. This metric can be used or specified by any development project, consenting body or landowner that needs to calculate biodiversity losses and gains for terrestrial and / or intertidal habitats and has been extensively tested.



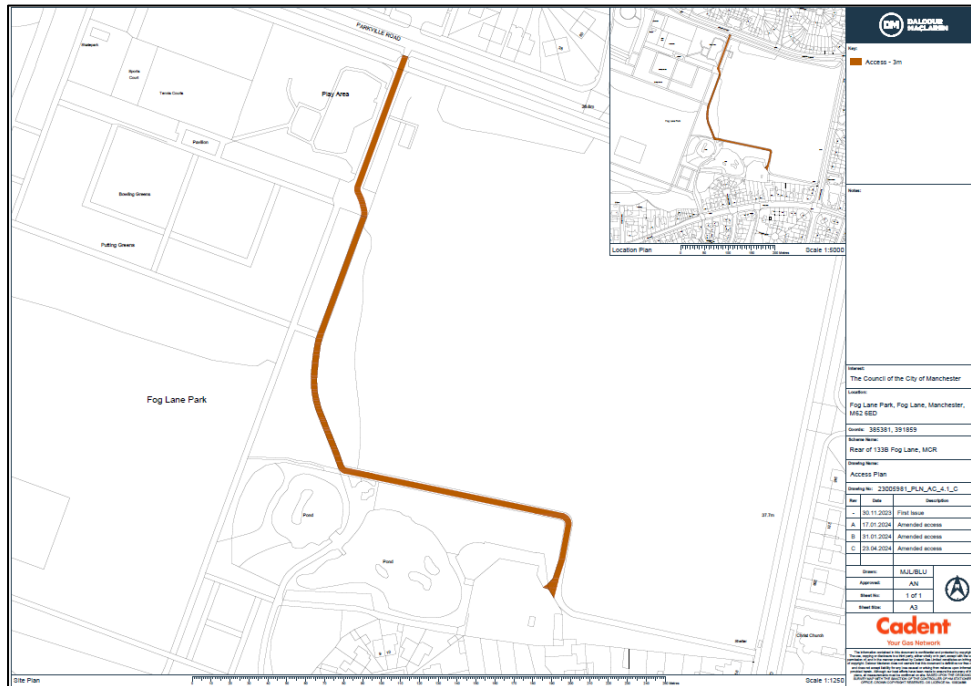


Figure 1.1: Existing access route to be retained (as provided by Dalcour Maclaren)

Policy and good practice for BNG

1.6 The National Planning Policy Framework (NPPF), revised in December 2023, mandates net gain in biodiversity from developments through paragraphs 180(d), 185(b) and 186(d). An effort should be made, therefore, through the development design to provide ecological enhancement in order to deliver an overall increase in biodiversity, and opportunities to incorporate biodiversity in and around developments should be encouraged.

1.7 The Environment Act 2021 ('The Act') came into force in November 2021. Aspects of the Act relating to BNG came into force on the 12th February 2024, whereby BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

1.8 The Act is supported by secondary legislation, consisting of six statutory instruments laid within law, of which the relevant legislation includes:

- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024¹
- The Biodiversity Gain Site Register Regulations 2024²
- The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024³
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024⁴

¹ <https://www.legislation.gov.uk/uksi/2024/44/contents/made>

² <https://www.legislation.gov.uk/uksi/2024/45/contents/made>

³ <https://www.legislation.gov.uk/uksi/2024/45/contents/made>

⁴ <https://www.legislation.gov.uk/uksi/2024/47/contents/made>



- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024⁵
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024⁶

1.9 Other legislature considered relevant for the purposes of this report includes the following:

- Biodiversity Net Gain: Good practice principles for development (2019),
- Natural Environment and Rural Communities (NERC) Act (2006) Section 41.

1.10 The 'Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan 2022 To 2039' (March 2024), Policy JP-G8: 'A Net Enhancement of Biodiversity and Geodiversity' states:

"Through local planning and associated activities a net enhancement of biodiversity resources will be sought, including, where relevant, by:

- 1. Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and those that support priority species;*
- 2. Improving connections between habitats, to protect and enhance the provision of corridors, ecological networks (including Nature Recovery Networks) and steppingstones that enable the movement of species, especially as the climate changes;*
- 3. Enhancing the management of existing habitats, including through habitat restoration, avoiding habitat fragmentation and combating invasive species;*
- 4. Protecting sites designated for their nature conservation and/or geological importance, with the highest level of protection given to international and then national designations;*
- 5. Facilitating greater access to nature, particularly within urban areas;*
- 6. Supporting the development and implementation of the Great Manchester Wetlands Nature Recovery Network; and*
- 7. Safeguarding, restoring and sustainably managing our most valuable soil resources, tackling soil degradation/erosion and recovering soil fertility, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land.*

Development will be expected to:

- a. Follow the mitigation hierarchy of:*
 - i. Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts, then*
 - ii. Adequately mitigating any harm to biodiversity, then*
 - iii. Adequately compensating for any remaining harm to biodiversity*
- b. Avoid fragmenting or severing connectivity between habitats;*

⁵ <https://www.legislation.gov.uk/uksi/2024/48/contents/made>

⁶ <https://www.legislation.gov.uk/uksi/2024/50/contents/made>



- c. Achieve a measurable net gain in biodiversity of no less than 10%*
- d. Make appropriate provision for long-term management of habitats and geological features connected to the development;*
- e. Where appropriate, development should: mitigate air pollution impacts on Manchester Mosses SAC; mitigate urban edge, functionally linked land and recreation disturbance impacts on the South Pennine Moors SAC/SPAs, and assess and potentially mitigate boat movement, water pollution, and light spillage and sharding impacts on the Rochdale Canal SAC; and*
- f. Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s) in the PfE evidence base and/or any updated or appropriate biodiversity/ecological assessments submitted as part of the planning applications process.”*



2.0 The Statutory Biodiversity Metric tool

2.1 Biodiversity Net Gain is specified as “an approach to development which aims to leave the natural environment in a measurably better state than before”. The Statutory Biodiversity Metric Calculation Tool is a quantitative tool used to calculate how development projects impact upon the biodiversity value of a site and allows for the scale of mitigative / compensatory measures to be calculated by a suitably qualified individual.

2.2 Application of use follows the Biodiversity Net Gain Principles and Rules (DEFRA, February 2024) covered in the most recent User Guide⁷ (see **Tables 2.1 – 2.2**), whilst also taking into account the Biodiversity Net Gain: Good practice principles⁸, developed by **CIRIA** (Construction Industry Research and Information Association), **CIEEM** (Chartered Institute of Ecology and Environmental Management) and **IEMA** (Institute of Environmental Management and Assessment).

2.3 It is a legal requirement that the four BNG Rules are met, whilst the Principles provide guidance for application of use.

Table 2.1 – Biodiversity Metric Rules

Rule Number	Rule Detail
1	The trading rules of this biodiversity metric must be followed.
2	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applied to each unit type.
3	To accurately apply the biodiversity metric formula, you must use the biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.
4	In exceptional circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

Table 2.2 – Biodiversity Metric Principles

Principle Number	Principle Detail
1	The metric assessment should be completed by a competent person.
2	The use of the biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirement. This includes consenting or licencing processes, for example woodlands.
3	The biodiversity metric should be used in accordance with established good practice guidelines and professional codes.
4	The biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
5	Biodiversity units are a proxy for biodiversity and should be treated as relative values.
6	This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.

⁷ See: https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf

⁸ See: <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>



7	Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
8	Created and enhanced habitats should seek, where practical and reasonable, to be local to any impact and deliver strategically important outcomes for nature conservation.
9	The metric does not enforce a minimum habitat size ratio for compensation of losses. However, proposals should aim to: • maintain habitat extent (supporting more, bigger, better and more joined up ecological networks) and • ensure that proposed or retained habitat parcels are of sufficient size for ecological function

2.4 Using the available baseline ecological information gathered and supported by the design information as has been communicated, the Statutory Biodiversity Metric Tool was completed by the following assessor (see **Table 2.3** overleaf):

Table 2.3 – BNG Assessor credentials

Name	Description of most relevant credentials
Mr. J. Pescod Qualifying CIEEM	• MRes Advanced Biological Sciences, BSc (Hons) Senior Ecologist, with 6 years extensive training and experience; • FISC 4 botanist; • Attended external webinars and training courses in applying the Metric, • Undertaken a number of BNG assessments, utilising both the SSM Beta's and full BNG tool, v3.0, v3.1, v4.0 & Statutory; • Managed extensive projects carrying out BNG baseline assessments of Council landholdings in the north-west.

2.5 This report was subsequently reviewed by Joshua Styles MSc AMRSB MCIEEM FISC Level 6, Director, Principal Ecologist and Botanical Specialist at Styles Ecology Ltd.

2.6 Assessment of baseline/post-development Area/ Hedge/ River units have been carried out and assessed separately in accordance with the guidance, principles, and rules – where present on site. Any revisions required following the issue of this report will use The Statutory Biodiversity Metric in accordance with the rules of use for that version.

2.7 Measurement of habitats was carried out using a combination of desktop software – QGIS, Google Earth and MAGiC maps 2023/24, whilst physical habitat measurements were also taken in the field during ground truthing, where necessary.

2.8 At the time of writing, no Local Nature Recovery Strategy has been produced for Greater Manchester. The Manchester City Council Local Development Framework Area Map Browser⁹ was therefore accessed and used, along with the GM BAP, to assess the strategic significance of the site and habitats present. The site falls within no map layers considered relevant to strategic significance.

⁹ See: <https://mcr-council.maps.arcgis.com/apps/webappviewer/index.html?id=565a33eaba904b2dabf4c3dd8685db80>



2.9 Key third-party data sources and / or information used to inform this BNG assessment include:

- Planning Draft – Fingleton White (Revision 21/03/2025).
- **Information Plan** – Dalcour Maclaren (Revision D, 23/04/2024).
- **Access plan** – Dalcour Maclaren (Revision C, 23/04/2024).



3.0 Limitations

3.1 Third-party information was utilised in the completion of the Biodiversity Net-gain assessment (see **Section 2.7**), therefore Styles Ecology Ltd cannot be held accountable for any possible discrepancies within supporting information.

3.2 The habitat codes of UK Habitats are not, at present, fully aligned with the Biodiversity Metric Calculator. Translations have, therefore, been made between the two categorisations by the assessor, who aims to most accurately represent the biodiversity value of the site and the habitats present.

3.3 Measurements have been calculated utilising software such as 'QGIS' (a Geographic Information System or GIS), aerial imagery and third-party plans provided by the applicant, all of which may have varying levels of inaccuracy, and as such Styles Ecology Ltd cannot be held accountable for any discrepancies between habitat areas (ha) or linear features (km) stated in this report and other documentation pertaining to the site.

3.4 The Statutory Biodiversity Metric allows for an area / length accuracy to any number of decimal places, however 'Total area' / 'Total length' is displayed to two decimal places, this may result in small rounding discrepancies on large sites with many small parcels of habitat. However, the metric uses the true value entered into each row to calculate the overall unit change of the site, thus while rounding discrepancies may be displayed under 'Total area' / 'Total length' these discrepancies do not impact the results of the calculation tool; these discrepancies should be taken into account by both the practitioner and reviewer in line with the above.

3.5 In considering possible limitations, no significant constraints were experienced which might adversely influence the results, conclusions, and recommendations of this BNG assessment, the results of which have been presented in accordance with the rules and principles of use to the satisfaction of the assessor.

4.0 Habitat survey

4.1 The reader is referred to the 'Hard copy' of the Metric¹⁰, which will accompany this report when issued and should be read in conjunction with this section. See **Tables 4.1** below for **baseline habitat information** as extracted from the Hard copy of the Metric. **Table 4.2** displays **post-development habitat information** based on the proposals provided to the author.

4.2 Please refer to **Appendix I** for specific scoring of the condition analyses carried out at the site on a per-habitat basis.

4.3 Proposals entail the erection of a new gas governor kiosk with associated parking and fencing.

4.4 The current proposals result in the loss of a small area of mixed scrub; see **Figures 4.1 – 4.2** overleaf for UK Habitats maps of the on-site habitats at the baseline and post-development stage.

Table 4.1 – Baseline Habitat information for Area habitats

Habitat Type	Area (hectares)	Condition	Assessor comments	Habitat Units
h3h Mixed scrub	0.0128	Poor	Much of the site comprises mixed scrub, with saplings and young trees, bramble (<i>Rubus fruticosus</i> agg.) and butterfly-bush (<i>Buddleja davidii</i>).	0.05
u1b6 Other developed land	0.1273	Condition Assessment N/A	An area of partially vegetated hardstanding with mosses, grasses, and ruderals, and the existing access track.	0.00
Total Habitat area (excl. urban trees)	0.14		Total Habitat Units (incl. urban trees)	0.05

Table 4.2 – Post-development Habitat information for Area habitats

Habitat Type	Area (hectares)	Condition	Assessor comments	Habitat Units
u1b5 Buildings	0.0022	Condition Assessment N/A	The new gas governor unit.	0.00
u1b6 Other developed land	0.1397	Condition Assessment N/A	The parking and area surrounding the gas governor, and existing access track.	0.00
Total Habitat area (excl. urban trees)	0.14		Total Habitat Units (incl. urban trees)	0.00

¹⁰This section of the report should be read in conjunction with the hard copy of the Statutory Biodiversity Metric tool – external Appendix.

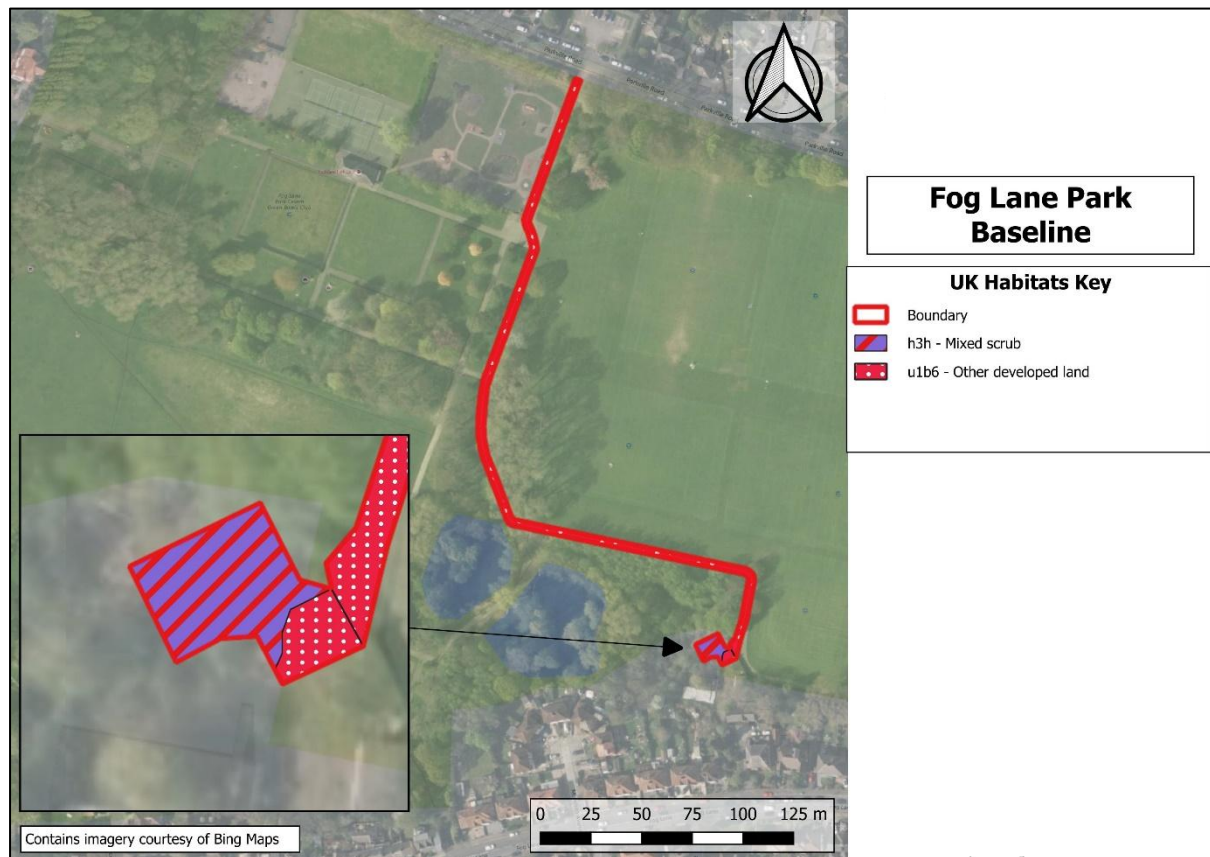


Figure 4.1: Baseline UK Habitats Map

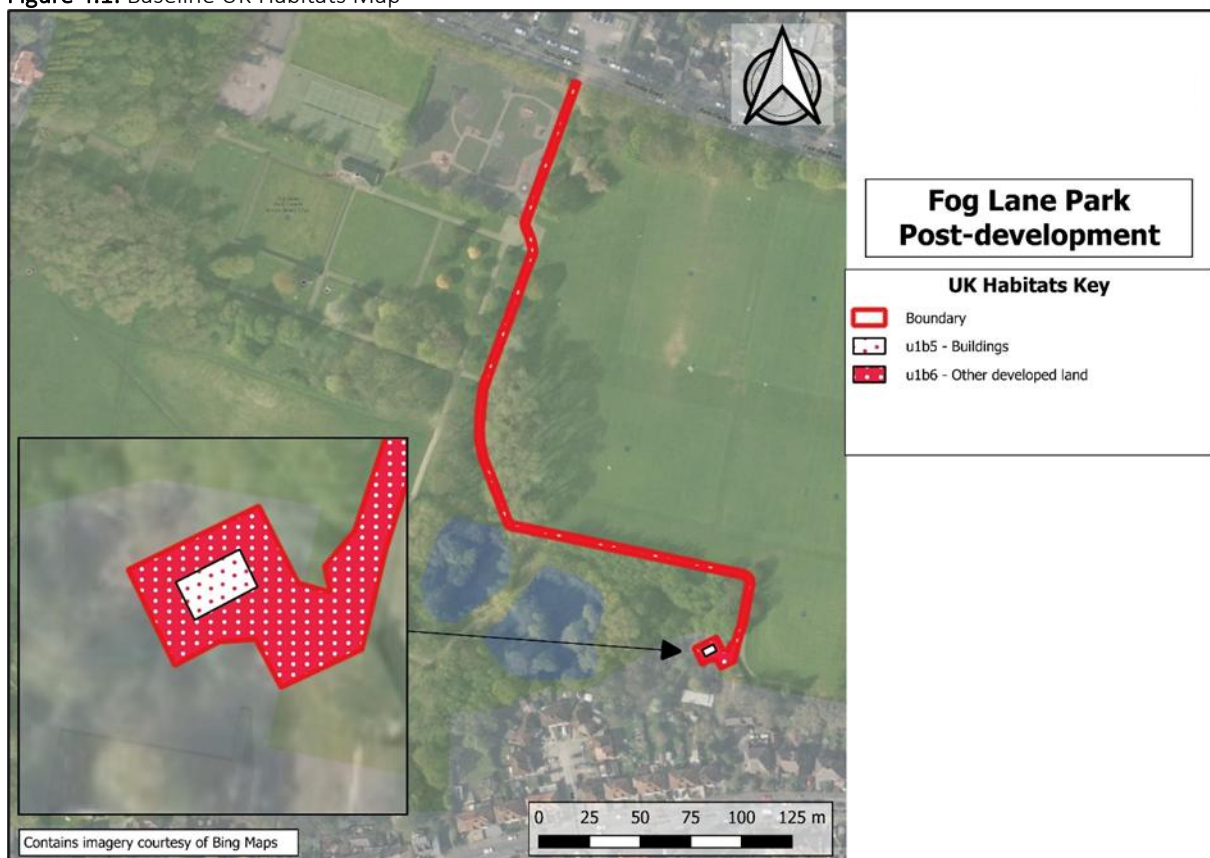


Figure 4.2: Post-development On-site UK Habitats Map

5.0 Conclusions & recommendations

5.1 Based on the results of the Statutory Metric, the scheme will result in a **100% net loss** in **Habitat Units**, and no change in Hedgerow Units.

5.2 In terms of specific unit changes, the metric output indicates a loss of **0.05 Habitat Units** and a change of **0.00 Hedgerow Units**.

5.3 The **trading rules are not satisfied** for the site.

5.4 See **Figure 5.1** below for Headline results summary of projections as outputted by the Statutory Biodiversity Net-gain Metric tool.

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-0.05
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-100.00%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

Figure 5.1: Headline results summary of projections output by the Statutory Biodiversity Metric Tool

5.5 As the proposed development will result in an on-site loss in habitat units, below the required legally mandated 10% net-gain, mitigation measure pertaining to habitat enhancement or creation will be required.

5.6 On-site enhancement is not possible, will the full footprint of the development being utilised to make the proposals feasible. Consideration to enhancement within the wider site has been given, in line with the mitigation hierarchy; however, the applicant has decided to source off-site biodiversity units from an appropriate habitat bank/register.

Next steps

5.7 The applicant will need to identify and contact an appropriate habitat bank. The bank should be located within the Manchester City Council boundary; should no such bank be available, a bank within an adjacent Local Planning Authority (LPA) or Natural Character Area (NCA) should be selected. As a last resort, a bank from a non-adjacent LPA or NCA can be utilised; however, the applicant should be aware that spatial risk multipliers will be applied to increase the number of units required for off-setting the further the bank is from the application site.



5.8 The applicant will supply the chosen habitat bank with the completed Statutory Metric calculation; the bank will identify the number of units required to achieve the mandated 10% net-gain. The current unit shortfall to 10% is **0.06 Habitat units**, though the spatial risk multiplier may inflate this figure.

5.9 Once the purchase of units has been organised with a suitable habitat banking company, a legal agreement will be entered between the applicant and the company, detailing 30 years of management.

5.10 There are 2 types of legal agreement for BNG:

- planning obligation (section 106) with an LPA,
- conservation covenant agreement with a responsible body.

5.11 As part of the legal agreement, the habitat banking company will need to commit to:

- creating or enhancing habitats,
- managing the habitats for at least 30 years.

5.12 The legal agreement must be in writing and signed by all parties ('executed as a deed'). For more information, see: <https://www.gov.uk/guidance/legal-agreements-to-secure-your-biodiversity-net-gain>.



Appendix I – Condition assessment tables

Condition Assessment Score – Mixed scrub

Condition Assessment Criteria		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). - At least 80% of scrub is native, - There are at least three native woody species, - 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).	Y
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	N
C	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA) and species indicative of suboptimal condition make up less than 5% of ground cover.	N
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	N
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	N
Total Score		1
Condition Assessment Result		Condition Assessment Score
Passes 5 criteria		Good
Passes 3 or 4 criteria		Moderate
Passes 2 or fewer criteria		Poor



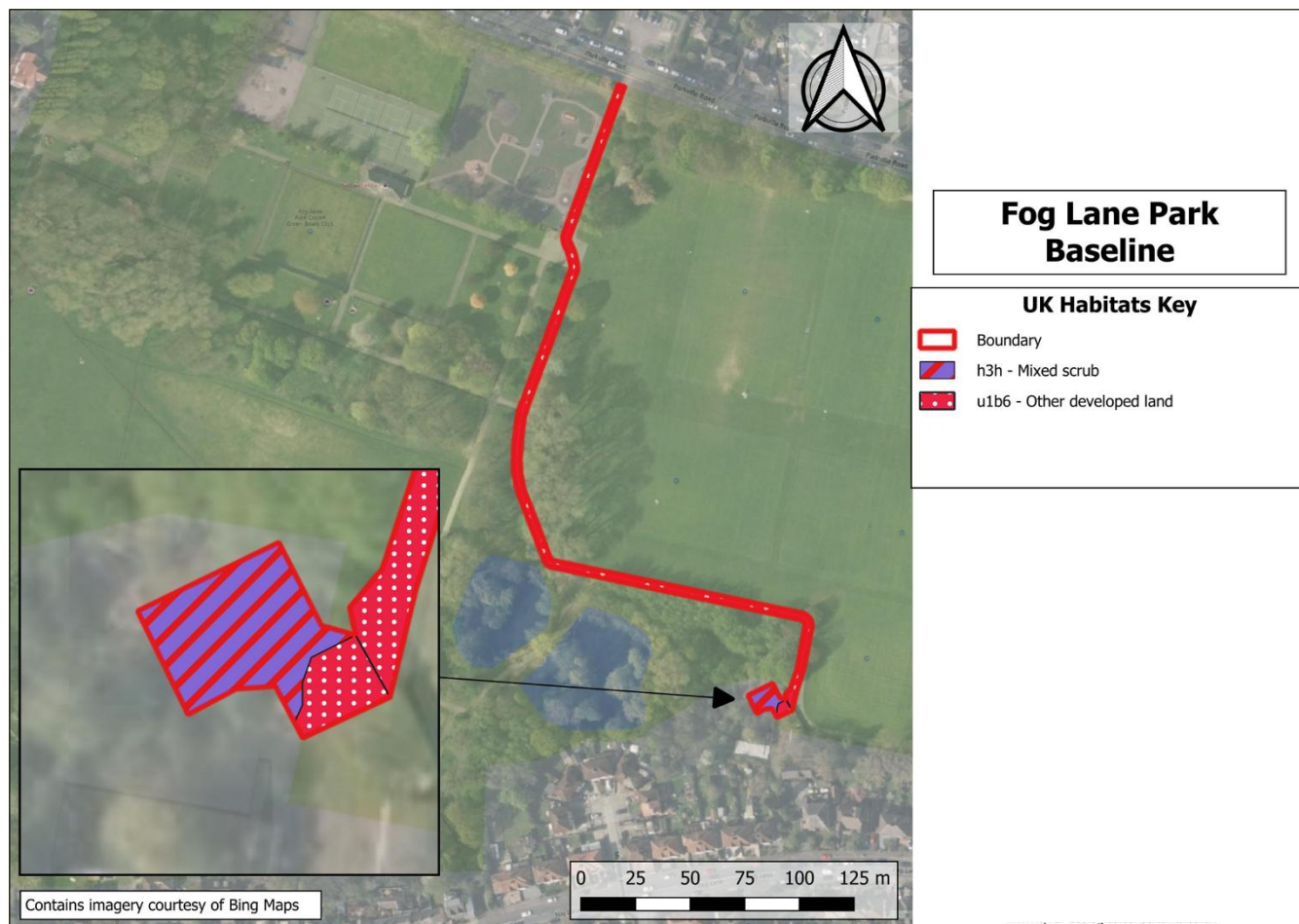
Post-development – Off-site (indicative)

Condition Assessment Score – Mixed scrub

Condition Assessment Criteria		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). - At least 80% of scrub is native, - There are at least three native woody species, - 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).	Y
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	Y
C	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA) and species indicative of suboptimal condition make up less than 5% of ground cover.	Y
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	N
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Y
Total Score		4
Condition Assessment Result		Condition Assessment Score
Passes 5 criteria		Good
Passes 3 or 4 criteria		Moderate
Passes 2 or fewer criteria		Poor

Appendix II – Baseline habitats plan

OS base map location plan with survey boundary indicated by red outline and off-site area demarcated by wider blue outline (courtesy of Dalcour Maclaren)



Appendix III – Post-development plan

