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BIODIVERSITY NET GAIN - BIODIVERSITY STATEMENT

At

Land at Pilch Lane

Dovecot
Liverpool
Merseyside
L14 0JG

NGR: SJ 41851 91136

Prepared for:	Andy Garnett, Breck Homes Ltd
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Date:	28 th May 2025
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UES reference:	UES04923/03





CONTENTS

CONTENTS	2
1 INTRODUCTION	3
1.1 Author and qualifications	3
1.2 Proposed development.....	3
1.3 Survey objectives	3
2 PLANNING POLICY	4
3 METHODOLOGY	5
4 RESULTS	6
4.1 Baseline assessment.....	6
4.2 Post-development assessment.....	6
5 EVALUATION AND RECOMMENDATIONS	7
5.1 Biodiversity net gain requirements	7
5.2 Recommendations.....	7
6 CONCLUSION.....	9
APPENDICES.....	10
Appendix 1 – UKHab Plan	10
Appendix 2 – Pre-degradation UKHab Plan.....	11
Appendix 3 – Post Development UKHab Plan	12
Appendix 4 – Photographs	13
Appendix 5 – Condition Assessments.....	14
Appendix 6 – Proposed Development Plan	15



1 INTRODUCTION

1.1 Author and qualifications

This report is compiled and written by Nathaniel Foley MSci and Graduate Ecologist for United Environmental Services (UES) Ltd. Nathaniel holds a level 4 Botanical Society for Britain and Ireland (BSBI) field identification skills certificate (FISC), which certifies him as competent to undertake phase 1 habitat surveys, UKHab and national vegetation classification (NVC) surveys.

1.2 Proposed development

The proposed development is a housing scheme and will include the construction of 34 residential dwellings with associated landscaping.

1.3 Survey objectives

This biodiversity statement has been produced for the proposed development at Pilch Lane, Liverpool. UES was commissioned in March 2025 to prepare the Biodiversity Statement as part of a Biodiversity Net Gain Assessment of the proposed development. This was completed in order to:

- Establish the baseline value of the site by calculating the number of habitat, hedgerow and watercourse units at the site of the proposed development.
- If detailed or indicative plans are available, establish the post development value of the development by calculating the number of habitat, hedgerow and watercourse units which will be created, retained and / or enhanced as part of the proposals.
- Provide guidance on habitat retention, creation and enhancement measures to inform proposed site layout and landscaping proposals and to maximize potential gains in biodiversity.
- Provide details of how offsite compensation will be used when a 10% biodiversity net gain cannot be achieved on site.



2 PLANNING POLICY

Paragraphs 187(d), 192(b) and 193(d) of the National Planning Policy Framework (NPPF) set out requirements for the delivery of BNG. In England, BNG is mandatory under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

Under the statutory framework, subject to some exceptions, every grant of planning permission is granted subject to the condition that the biodiversity gain objective is met (“the biodiversity gain condition”). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitats.

Mandatory BNG only applies for planning permission applications made on or after 12th February 2024. Permissions granted for applications made before this date are not subject to BNG. A temporary exclusion applies for non-major developments whereby mandatory BNG only applies for planning permission applications made on or after 2nd April 2024.

The Environment Act 2021 sets out the following key components to mandatory BNG:

- Minimum 10% gain required calculated using DEFRA Statutory Biodiversity Metric & approval of net gain plan
- Habitat secured for at least 30 years via obligations / conservation covenant
- Habitat can be delivered on-site, off-site or via statutory biodiversity credits
- There is a national register for net gain delivery sites
- The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss
- Also applies to Nationally Significant Infrastructure Projects (NSIPs)
- Does not apply to marine development
- Does not change existing legal environmental and wildlife protections



3 METHODOLOGY

The BNG assessment has been undertaken using the DEFRA Statutory Biodiversity Metric. The metric was used to calculate baseline habitat, hedgerow and watercourse units. An extended UK Habitat Classification survey was undertaken as part of a Preliminary Ecological Appraisal (PEA) of the site, undertaken by UES on 6th May 2025. Surveyors present included:

- Ysobella Cox BSc MBiol, UES Ecologist. Ysobella holds a level 3 Botanical Society for Britain and Ireland (BSBI) field identification skills certificate (FISC), which certifies her as competent to undertake phase 1 habitat and UKHab surveys.

Habitats recorded within the proposed development site were mapped on a UK Habitat Classification (UKHab) plan provided at Appendix 1. Full details of each habitat recorded onsite are provided within the PEA report (reference UES04923/03), which has been submitted as part of this planning application.

Site clearance occurred in 2025, a few months prior to the biodiversity net gain assessment. As such, a detailed assessment of the habitats which would have been present onsite could not be undertaken. Therefore, a precautionary measure has been taken, and the pre-degradation value of the site has been based on aerial imagery and survey data. Where information could not be determined from this source, a higher condition score was assigned as a precautionary measure.

The habitats which are suspected to have been present within the proposed development area prior to clearance have been mapped on a UKHab plan provided at Appendix 2.



4 RESULTS

4.1 Baseline assessment

The proposed development site has an area of approximately 0.75ha and has recently been subject to vegetation clearance works. As such, the majority of the proposed development site comprises bare ground that has been encroached by ephemeral vegetation, with small areas of modified grassland and scattered scrub. The northern section of the site comprises a disused carpark. There are several brash piles throughout the site and chippings from the cleared vegetation.

The baseline value of the site has been calculated as 4.49 habitat units, 0 hedgerow units and 0 watercourse units using DEFRA's Statutory Biodiversity Metric.

The DEFRA Statutory Biodiversity Metric used to calculate the baseline value of the site has been submitted with this report and provides full details of the calculations.

4.2 Post-development assessment

Detailed landscaping plans have been produced by Trevor Bridge Associates Ltd in March 2024 (Drawing number 7649.01; Rev C), upon which the post development value of the site has been calculated.

The post-development value of the site has been calculated as 1.26 habitat units, 0.54 hedgerow units and 0 watercourse units using DEFRA's Statutory Biodiversity Metric.

The DEFRA Statutory Biodiversity Metric used to calculate the post-development value of the site has been submitted with this report and provides full details of the calculations.

5 EVALUATION AND RECOMMENDATIONS

5.1 Biodiversity net gain requirements

The baseline value of the site has been calculated as 4.49 habitat units, 0 hedgerow units and 0 watercourse units. Based on the landscaping plans provided, the proposed development will result in a net loss of 3.22 habitat units (-71.85%), with a net gain of 0.54 hedgerow units (a net gain above 10% due to the baseline value of 0 hedgerow units). There is no net change in watercourse units.

In order to achieve a 10% net gain in biodiversity, a further 3.67 habitat units are required. No additional hedgerow or watercourse units are required due to the baseline value of 0 units.

In addition to providing the 10% net gain in habitat and hedgerow units required to adhere to national planning policy, the metric's trading rules must also be met to provide an acceptable net gain. This is a function of the metric that has been designed to ensure habitats are compensated for sufficiently.

To adhere to the metric's trading rules, losses must be replaced by habitat, hedgerow and watercourse units of the same broad habitat type and distinctiveness, or by units from any habitat with a higher distinctiveness regardless of the broad habitat type. Based on the details provided to UES at this stage, details of additional units required to meet the trading rules are provided in the table below.

- 3.39 habitat units of medium distinctiveness heathland and shrub, or from any habitat of a higher distinctiveness band (from any broad habitat type).
- 0.30 habitat units of any low distinctiveness habitat, or from any habitat of a higher distinctiveness band (from any broad habitat type).

5.2 Recommendations

Where possible, onsite habitat creation and enhancement will be prioritised to maximise net gain within the proposed development site. However, it is considered unlikely that sufficient onsite habitat retention, creation and / or enhancement will be feasible whilst facilitating the proposed development. As such, any deficit in units will be provided through offsite compensation. This will either be secured on land within the developer ownership, or through a payment to a third-party landowner acting as a habitat bank.

All compensatory offsite habitat units secured will need to be registered on the Biodiversity Gain Site Register.

As a last resort and where offsite compensation cannot be secured in the local area, statutory credits will be purchased as compensation.

The information contained within this Biodiversity Statement is considered to be sufficient to allow the local planning authority to grant planning permission, with regards to statutory biodiversity net gain requirements. Following approval of planning permission, the biodiversity gain condition will be applied to the permission, which must be discharged prior to the commencement of works.



A Biodiversity Gain Plan (BGP) must be prepared to discharge this condition. The BGP must include baseline and post-development Statutory Metric calculations based on the finalised site layout and landscaping proposals. It must also contain full details of secured offsite compensation (where necessary) and a Habitat Management and Monitoring Plan (HMMP), detailing the proposed establishment, management and monitoring of all offsite compensation and any significant enhancements onsite.

All retained, created or enhanced habitats that constitute offsite compensation or onsite significant enhancements will need to be managed and monitored for a period of at least 30 years. This can be secured through a section 106 agreement or a conservation covenant.

Following submission of the Biodiversity Gain Plan, the local planning authority will have up to eight weeks to discharge the biodiversity gain condition.



6 CONCLUSION

The proposed development site has an area of approximately 0.75ha and has recently been subject to vegetation clearance works. As such, the majority of the proposed development site comprises bare ground that has been encroached by ephemeral vegetation, with small areas of modified grassland and scattered scrub. The northern section of the site comprises a disused carpark. There are several brash piles throughout the site and chippings from the cleared vegetation.

Based on the landscape plans provided, the proposed development will result in a net loss of 3.22 habitat units (-71.85%), with a net gain of 0.54 hedgerow units (a net gain beyond 10% due to the baseline value of 0 hedgerow units). There will be no net change in watercourse units.

To satisfy the trading rules within the metric, any habitats that are to be lost as part of the proposed development must be compensated for with habitats of the same distinctiveness and same broad habitat type, or any habitat of higher distinctiveness.

Where possible, onsite habitat creation and enhancement will be prioritised to maximise net gain within the proposed development site. It is considered unlikely that sufficient onsite habitat retention, creation and / or enhancement will be feasible whilst facilitating the proposed development. As such, any deficit in units will be provided through offsite compensation.

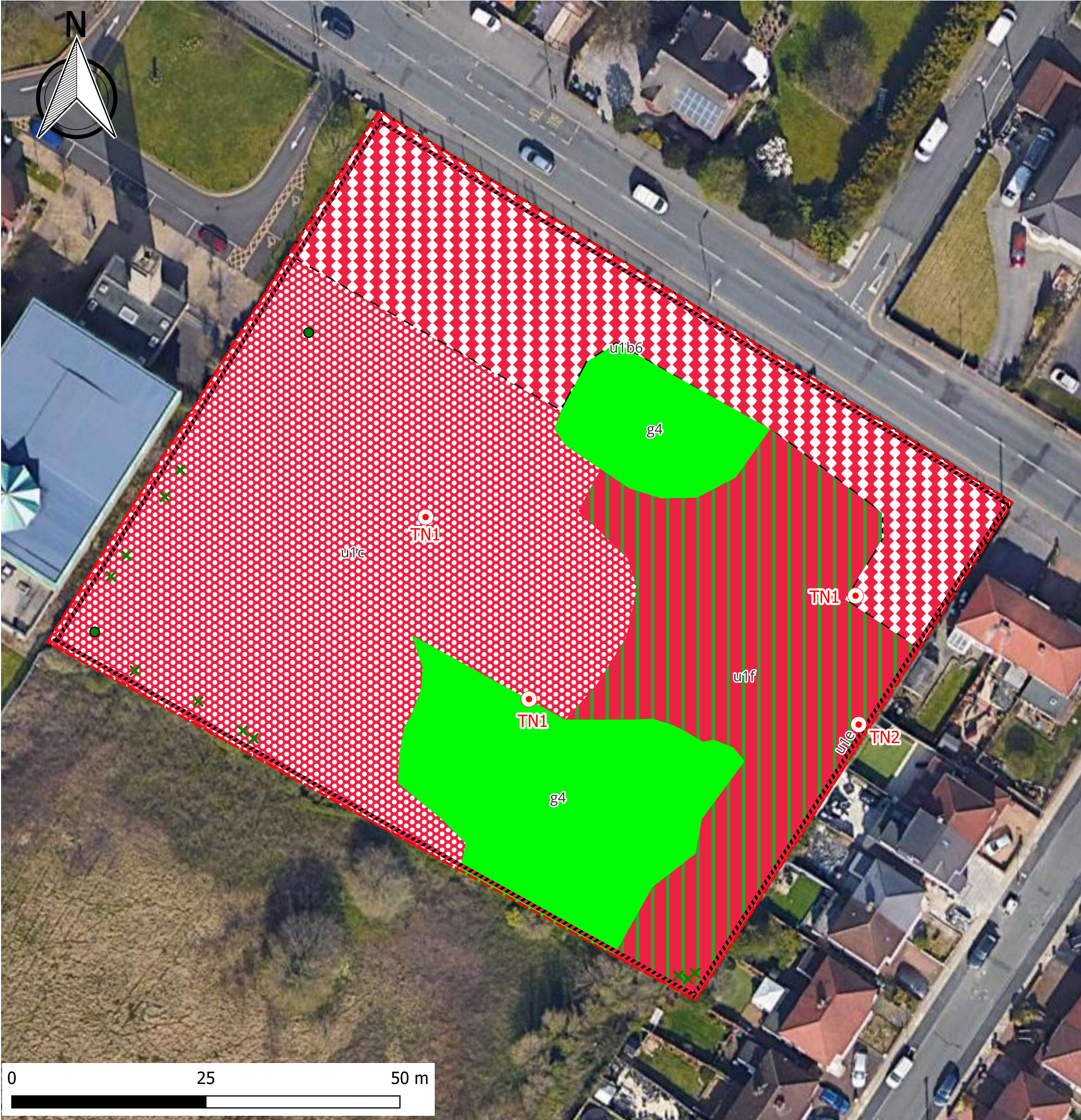


APPENDICES

Appendix 1 – UKHab Plan

Target note 1 – Brash pile

Target note 2 – Cavities within the mortar of a redbrick wall



Preliminary Ecological Appraisal

Site: Land at Pilch Lane,
Liverpool
NGR: SJ 41851 91136
Author: Ysobella Cox
Date: 21/05/2025



Key

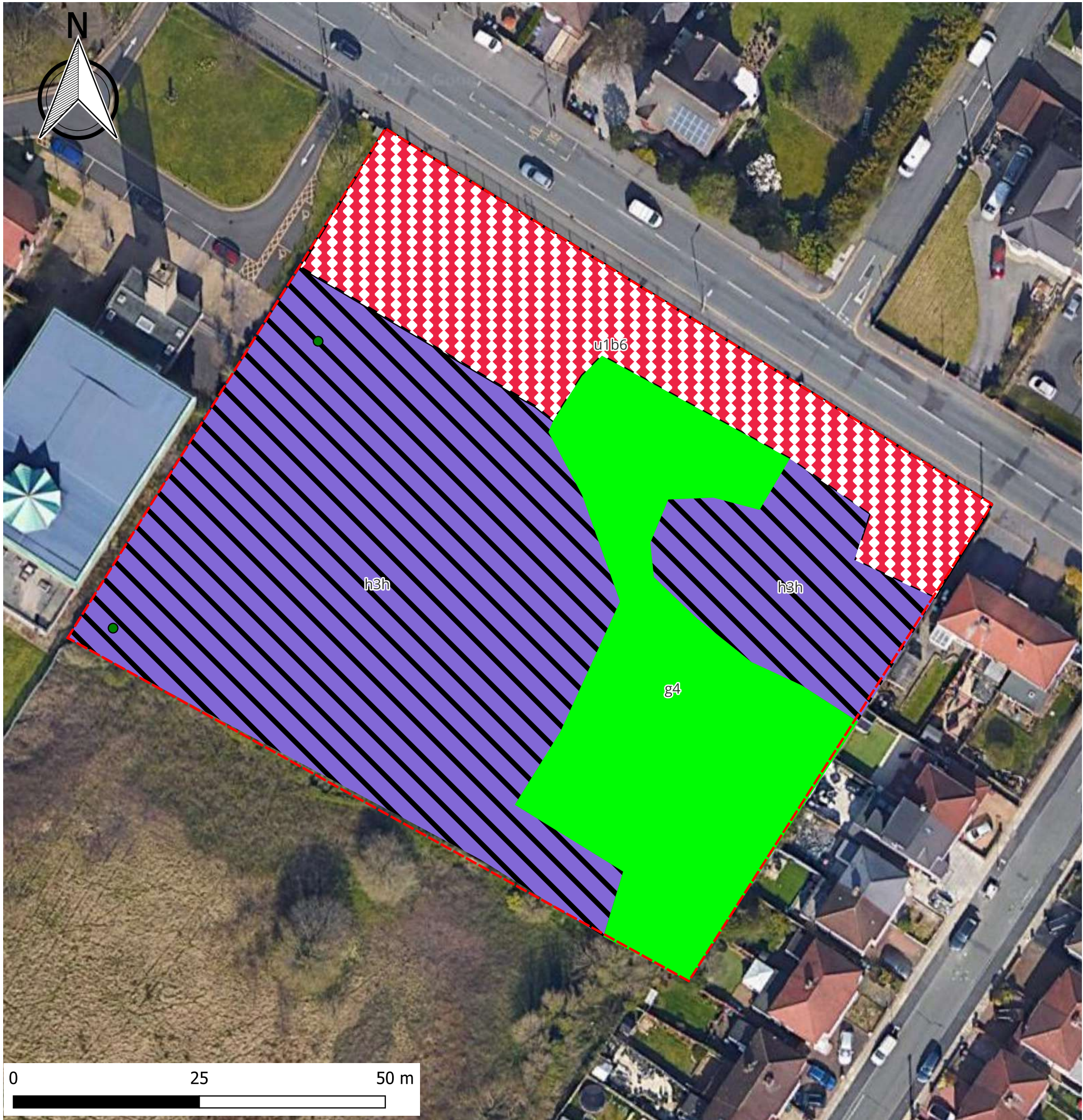
- g4 - modified grassland
- u1b6 - other developed land
- u1c - artificial unvegetated unsealed surface
- u1f - sparsely vegetated urban land
- Survey boundary
- 10 - scattered scrub
- 32 - scattered trees
- Target Notes

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Appendix 2 – Pre-degradation UKHab Plan



UK Habitat Classification Plan (Pre-degradation)

Site: Land at Pilch Lane,
Liverpool
NGR: SJ 41851 91136
Author: Ysobella Cox
Date: 22.05.2025



Key

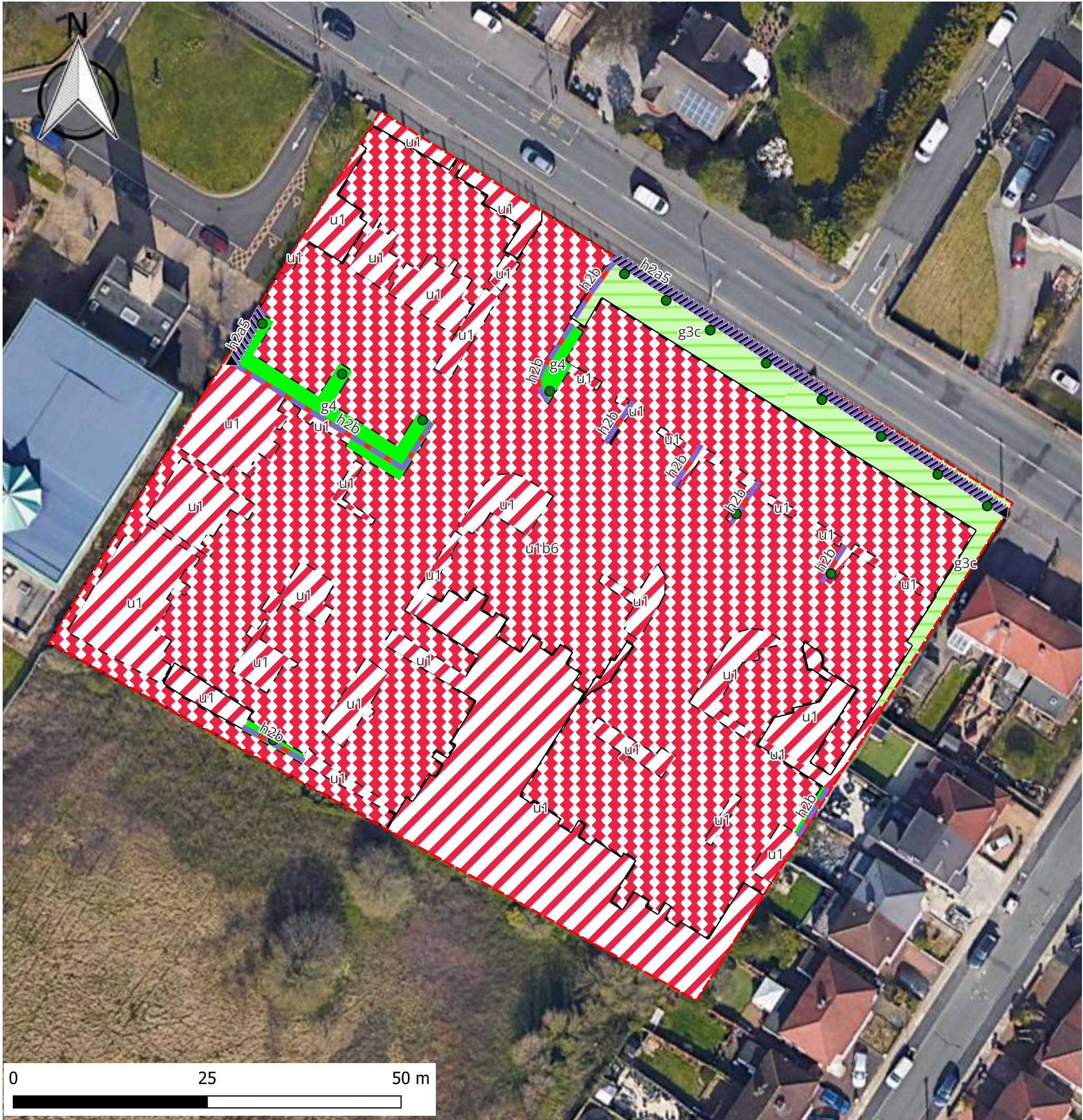
- g4 - modified grassland
- h3h - mixed scrub
- u1b6 - other developed land
- Survey boundary
- 32 - scattered trees

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Appendix 3 – Post Development UKHab Plan



Appendix 3 - Post Development Plan

Site: Land at Pilch Lane,
Liverpool
NGR: SJ 41851 91136
Author: Nathaniel Foley
Date: 19.12.25



Key

- Proposed development boundary
- g3c - other neutral grassland
- g4 - modified grassland
- h2a5 - species-rich native hedgerow
- h2b - non-native and ornamental hedgerow
- u1 - built-up areas and gardens
- u1b6 - other developed land
- 32 - scattered trees

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Appendix 4 – Photographs



Photograph 1. Looking south across the proposed development site.



Photograph 2. Looking southwest across the proposed development site.



Photograph 3. Modified grassland within the northern section of the proposed development site.



Photograph 4. Spoil mounds within the southern section of the site with ruderal species.



Photograph 5. Disused carpark within the northern section of the site.



Photograph 6. Bare ground within the western section of the site.



Photograph 7. Recently cleared scrub.



Photograph 8. Discarded waste within the site and a recently felled tree.



Photograph 9. Example brush pile and cleared scrub.



Photograph 10. Redbrick wall with an ivy *Hedera helix* covering.



Photograph 11. Sparsely vegetated urban land within the eastern section of the site.



Photograph 12. Example of scattered scrub along the boundaries of the site.



Photograph 13. Example of a recently felled tree.



Appendix 5 – Condition Assessments

Condition Sheet: SCRUB Habitat Type			
Habitat Types			
Heathland and shrub - Mixed scrub			
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
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 species², - 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> or box <i>Buxus sempervirens</i>, which can be up to 100% cover).	Yes	As the site had been cleared prior to the biodiversity net gain assessment, species composition could not be determined. Therefore, it is assumed that this criteria would have been passed.
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran ³) shrubs are all present.	No	As the site had been cleared prior to the biodiversity net gain assessment, a drone photograph and aerial imagery was used to determine the age of the scrub. Based on this information, it appears that no mature, ancient or veteran scrub was present and therefore, it is assumed that this criteria would have failed.
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.	Yes	No invasive species were identified during the walkover survey. It is assumed that this criteria would have been passed.
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	Aerial imagery indicates that the edge of the scrub directly connected to an unmanaged grassland. Therefore, it is assumed that this criteria would have been passed.
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Yes	As the site had been cleared prior to the biodiversity net gain assessment, the presence of clearings and glades could not be determined. Therefore, it is assumed that this criteria would have been passed.
Number of criteria passed		4	
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)	X
Passes 2 or fewer criteria		Poor (1)	

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)			
UK Habitat Classification (UKHab) Habitat Type			
Grassland - Modified grassland			
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	There are 6-8 vascular plant species per m² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	Yes	The two remaining grasslands onsite contained an average of either 5 (southern grassland) or 8 species (northern grassland) per sq metre. As such, it is assumed that this criteria would have been passed for both areas, given the disturbed nature of the southern grassland.
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No	Due to the unmanaged nature of the site prior to clearance, it is assumed that the grassland would have had a tall sward height. As such, it is assumed that this criteria would have failed.
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	No	Due to the unmanaged nature of the site prior to clearance and the presence of dense scrub throughout, it is assumed that the grassland would have been encroached by scattered scrub. As such, it is assumed that this criteria would have failed.
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Yes	Due to the unmanaged nature of the site prior to clearance, it is assumed that this criteria would have been passed.
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Yes	Due to the unmanaged nature of the site prior to clearance, it is assumed that this criteria would have been passed.
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes	It is assumed that this criteria would have been passed.
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Yes	No invasive species were identified during the walkover survey. It is assumed that this criteria would have been passed.
Essential criterion achieved (Yes or No)			Yes
Number of criteria passed			5
Condition Assessment	Condition Assessment Score	Score Achieved x/√	
Passes 6 or 7 criteria including	Good (3)		
Passes 4 or 5 criteria including	Moderate (2)	x	
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)		

Condition Sheet: INDIVIDUAL TREES Habitat Type			
Habitat Types			
Individual trees – Urban trees			
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).	Yes	As the two trees have been felled, the species could not be determined. Therefore, it is assumed that this criteria would have been passed.
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	Scattered trees that automatically pass this criteria.
C	The tree is mature (or more than 50% within the block are mature) ¹ .	Yes	As the two trees have been felled, the maturity could not be determined. However, as the tree stumps measured >30cm, it is assumed that this criteria would have been passed.
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	It is assumed that this criteria would have been passed.
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Yes	It is assumed that this criteria would have been passed.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	It is assumed that this criteria would have been passed.
Number of criteria passed		5	
Condition Assessment Result	Condition Assessment Score	Score Achieved x/√	
Passes 5 or 6 criteria	Good (3)	x	
Passes 3 or 4 criteria	Moderate (2)		
Passes 2 or fewer criteria	Poor (1)		



Appendix 6 – Proposed Development Plan

