

Pendle Road, Clitheroe



Biodiversity Net Gain Assessment

Report Ref. ER-8455-04A

19/12/2025

Richborough Estates

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Report duration				In accordance with CIEEM (2019), unless otherwise stated the findings of this report remain valid for a period of 18 months. After this period advice should be sought on the scope of any updating work required.
Amendment	Date	Author	QA	Summary of changes
ER-8455-04A	19/12/2025	JAR	RH	Tree T44 accorded non-veteran status



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Introduction

1. Brooks Ecological Ltd was commissioned by Richborough Estates to carry out a Biodiversity Net Gain (BNG) Assessment of the proposed development Site at Pendle Road, Clitheroe.
2. The assessment applies to the parcel of land shown in Figure 1 opposite.
3. The assessment is informed by a Preliminary Ecological Appraisal Survey of the Site detailed in our report ER-8455-01C and a River Condition Assessment detailed in our report ER-8455-02B.
4. At this time Brooks Ecological also carried out an assessment of the baseline value of the Site in relation to BNG, and presented this alongside advice on achieving the best BNG position in our report ER-8455-03B. This current report supersedes ER-8455-03B and reproduces the relevant information on the Site's baseline.
5. Biodiversity Accounting metrics are used to quantify the value of a site in Biodiversity Units. This helps in assessing the ecological impacts of the proposed development and can help to inform avoidance, or on-Site mitigation levels required; or as a last resort can translate to a direct monetary value where compensation (off-Site) is required.
6. For the purposes of metric calculations, the Site area has been measured using GIS against the provided red line boundary as 8.93ha.
7. Our assessment has made use of the Statutory Biodiversity Metric Calculation Tool, and extracts from this have been used throughout the report. The full spreadsheet has been provided digitally as file BM-8455-01B, and should be submitted as part of the application.

Limitations

8. The red line boundary has been produced through georeferencing the supplied plans to the highest accuracy achievable. Positional accuracy cannot be fully verified; mapped features should be interpreted as spatial estimates rather than exact on-ground locations.

Figure 1 Extent of BNG assessment (red line boundary).



Pre-development baseline

Habitats identified

9. Habitats present on-Site are outlined in Table 1, overleaf. These are shown in relation to location and extent in Figure 2 overleaf.

Condition Assessment

10. Habitat condition has been assessed as part of the Preliminary Ecological Appraisal of the Site.
11. Information on condition assessments is provided in the Excel spreadsheet CA-8455-01 provided alongside this report.

Strategic Significance

12. None of the habitats on-Site fall within or close to the WHN, and so all are mapped as 'area/compensation not in local strategy/ no local strategy'.

13. Irreplaceable habitats have been found on-Site; these are indicated in Table 1, overleaf. These habitats do not have a BNG requirement as they are too valuable to be compensated for. As such, any losses to irreplaceable habitats cannot be calculated by the metric and they are removed from the baseline. These will require consideration outside of biodiversity net gain, which must comply with policy, legislation and regulations. Bespoke compensation for any loss or deterioration of irreplaceable habitats will be required.

Habitat Degradation¹

14. There is no evidence on Site or in aerial mapping of the Site which suggests that it has been deliberately degraded.

Biodiversity Metric

15. Habitat types, conditions, and areas have been entered into the Statutory Biodiversity Metric Calculation Tool, alongside information on their strategic significance.
16. The Statutory Biodiversity Metric Calculation Tool (published 03/07/2025), is provided alongside this assessment, in Excel spreadsheet BM-8455-01B, and may be useful in investigating design options for the Site.

¹ See [Appendices](#) for further information on degradation.

Table 1 Habitat Types.

Habitat	Label ref.	Irreplaceable?	Distinctiveness	Condition	See Condition Assessment sheet
Modified grassland	G1-G6	No	Low	Poor	5B
	G10	No		Good*	N/A*
Other neutral grassland	G7	No	Medium	Poor	6A
	G8-9, G11-12	No		Good*	N/A*
Hawthorn scrub	S1	No	Medium	Moderate	20B
Mixed scrub	S2	No	Medium	Good	20B
Artificial unvegetated, unsealed surface	U1, U5	No	Very Low	N/A	N/A
Developed land; sealed surface	U2-4, U6	No	Very Low	N/A	N/A
Rural tree**	T34-36, T45	Yes	N/A	Good	9A-E
	T1, T3, T4, G13d, T43, T44, T46, T47	No	Medium	Good	
	T2, T5, T9, T10-14, G13a-c, T24, T30, T48	No		Moderate	
Species-rich native hedgerow with trees	H01, H08	No	High	Good	8A-B
	H05	No		Moderate	
Native hedgerow with trees	H03	No	Medium	Moderate	
Species-rich native hedgerow	H06	No	Medium	Moderate	
Native hedgerow	H07, H09	No	Low	Good	
	H02, H04, H10	No		Moderate	
Other rivers and streams	R1, R2	No	High	Fairly Good	26A, B
	R3	No		Fairly Poor	26C

* Habitats marked with an asterisk were not covered in the original Site survey. Habitat types and condition scores presented here have been based on Google Street View imagery and are precautionarily high.

** Rural trees within hedgerows H01, H03 and H08 ("with trees"-type hedgerows) will be retained post-development, and so are not counted within the Site baseline, per Metric rules.

Figure 2 The Site's habitats assigned to types used in the Biodiversity Metric. Labelled codes cross-reference to our condition assessment and description in the PEAR, which should be read in conjunction with this report.



Trading Rules

17. As part of delivering a Net Gain for biodiversity, the BNG process requires that trading rules are complied with, such that loss of habitats is compensated for in a like-for-like or like-for-better fashion. This is based on habitat distinctiveness.
18. Once trading rules are complied with, the 'gain' component can come from any distinctiveness category.

Habitat Unit Score

19. The Site has been assessed as having a baseline score of 24.93 Habitat Units. These break down as shown in Table 2, below.

Table 2 Habitat Units broken down by distinctiveness at this Site.

Distinctiveness	Units	Approach to compensation if lost
Very Low	0	No compensation required.
Low	16.65	Losses must be replaced with area habitat units of the same or higher distinctiveness.
Medium	8.29	Losses must be replaced by area habitat units of either medium distinctiveness habitats within the same broad habitat type, or any habitat from a higher distinctiveness from any broad habitat type.
High	0	Losses must be replaced with area habitat units of the same habitat type.
Very High	0	Priority should be given to replacing losses with area habitat units of the same habitat type.
Irreplaceable	0*	Cannot be compensated for.

Hedgerow Unit Score

20. The Site has been assessed as having a baseline score of 10.98 Hedgerow Units. These break down as shown in Table 3, below.

Table 3 Hedgerow Units broken down by distinctiveness at this Site.

Distinctiveness	Units	Approach to compensation if lost
Very Low	0	Losses must be replaced with hedgerow units of the same or of a higher distinctiveness.
Low	3.41	Losses must be replaced with hedgerow units of the same or of a higher distinctiveness.
Medium	1.39	Losses must be replaced with hedgerow units of the same or of a higher distinctiveness.
High	6.18	Losses must be replaced with hedgerow units of the same habitat type or of a higher distinctiveness.
Very High	0	Losses must be replaced with hedgerow units of the same habitat type.

Watercourse Unit Score

21. The Site has been assessed as having a baseline score of 3.29 Watercourse Units. These break down as shown in Table 4, below.

Table 4 Watercourse Units broken down by distinctiveness at this Site.

Distinctiveness	Units	Approach to compensation if lost
Low	0	Losses must be replaced with watercourse units of a higher distinctiveness.
Medium	0	Losses must be replaced with watercourse units of the same habitat type.
High	3.29	Losses must be replaced with watercourse units of the same habitat type.
Very High	0	Priority should be given to replacing losses with watercourse units of the same habitat type.

Post-development value²

22. This section calculates the Biodiversity Unit value of the post-development Site and quantifies any gain or shortfall in Units.

Proposed habitats

23. Habitats present on-Site post-development have been based on the Illustrative Landscape Masterplan (Figure 3, opposite) dwg. P25_2353_EN_07A rev. A (Pegasus Group, December 2025).
24. Planting types specified in the Illustrative Landscape Masterplan have been assigned a UK Habitat Classification description that best fits the target habitat.
25. Habitats assigned are shown in Figure 4 overleaf.

Condition assessment

26. The condition assessment for each proposed habitat is based on what is realistic and achievable for the Site, based on the Illustrative Landscape Masterplan.
27. Achieving these conditions scores will be reliant on specific, ecologically-driven management recommendations. These can be outlined in a Biodiversity Enhancement and Management Plan (BEMP) and/or will be set out in a Habitat Management and Monitoring Plan (HMMP), which will be required as a standard condition of planning.

Figure 3 Illustrative Landscape Masterplan dwg. P25_2353_EN_07A rev. A (Pegasus Group, December 2025).



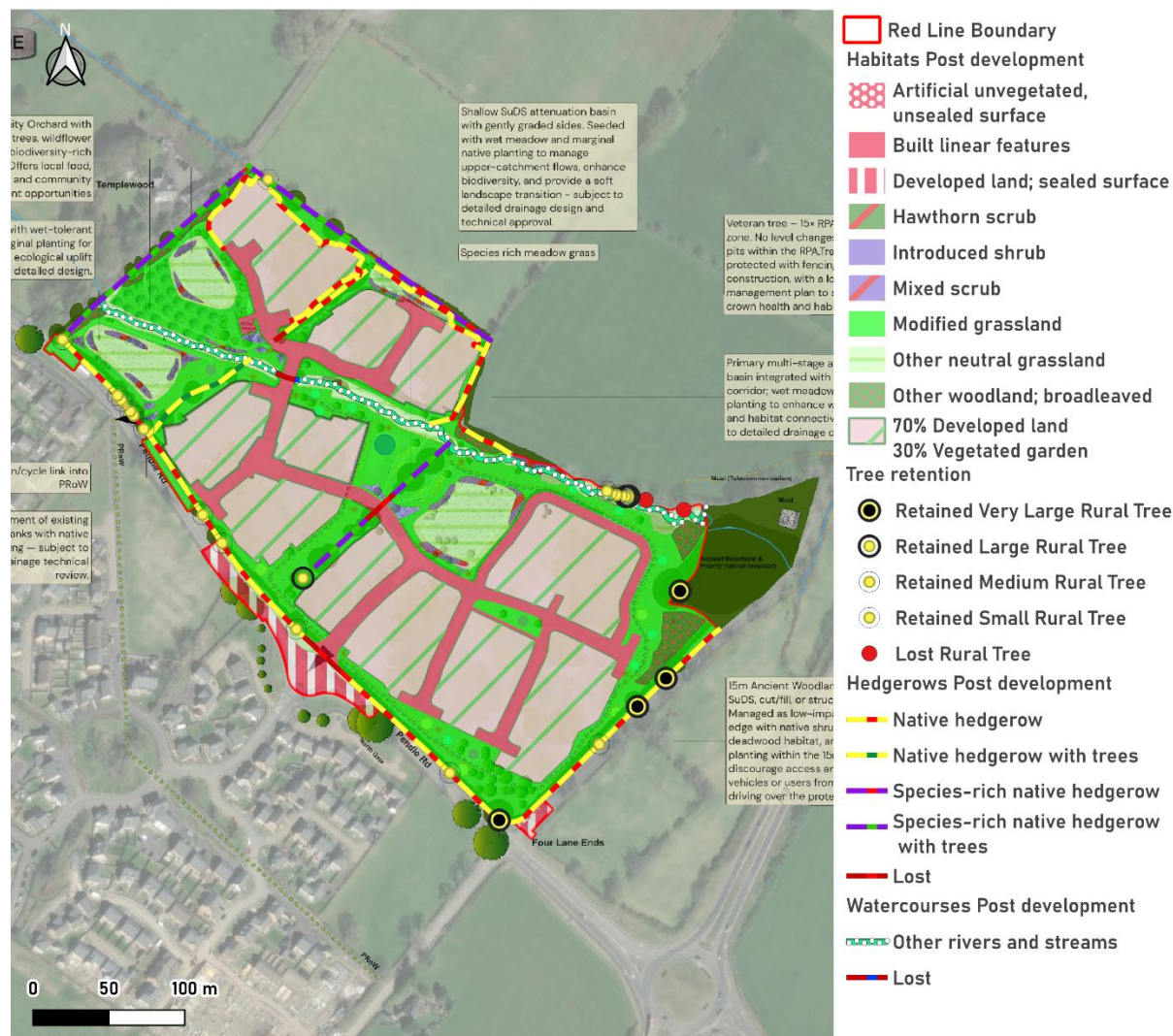
² Please see assumptions section at end of report

Post-development habitats

Habitat Score

28. The Site has been assessed as having a post-development score of 24.52 Habitat Units, 12.49 hedgerow Units and 3.41 Watercourse Units.
29. This score is based on our interpretation of the Illustrative Landscape Masterplan, as shown in Figure 4 opposite.
30. Calculations for the change in Habitat Units have been based on most of the Site being cleared of existing habitats and land reprofiled, which results in the loss of 18.21 Habitat Units, 0.56 Hedgerow Units and 0.04 Watercourse Units present pre-development.
31. Post-development calculations include Habitat Units gained through the creation of areas of amenity grassland consisting of other neutral grassland and modified grassland planted in moderate condition.
32. At this point it has been assumed that 70% of the area designated for housing development will consist of developed land sealed surface, and 30% vegetated garden.
33. New hedgerows are to be planted and are classed here as *species-rich native hedgerows* in Moderate condition. This satisfies the Metric in terms of Hedgerow Units.
34. For this indicative plan it has been assumed there will be 50 new trees planted in moderate condition across the Site, as street trees and in POS.
35. It may be possible to enhance the northwestern section of the stream from Fairly Poor to Moderate condition through works in the riparian zone. This offsets watercourse units lost through the creation of a culvert.

Figure 4 Post-development habitats.



Habitat Retention

- 36. The plan opposite shows the areas of the Site which it will be possible to retain without impact. This information allows us to see which areas can be identified as retained or enhanced in the metric calculations.
- 37. This plan is based on information provided by the developer who will have considered / consulted their team on requirements to provide (amongst other things) Site compounds, to store and move materials, to install drainage, flood storage, access and services – all with suitable easements.
- 38. At this stage metric calculations assume that it will be possible to fence off and protect the areas shown opposite from any impacts of Site clearance and construction and that any enhancement can be carried out alongside relevant phases of the proposed development.

The BNG Hierarchy

- 39. The project’s engagement with the Mitigation Hierarchy is set out in Appendix 1.

Figure 5 Habitat retention.



Change in Unit Value

- 40. The Statutory Metric has been used to calculate the net unit change for the Site; this has been predicted an overall net loss of 0.41 Habitat Units (-1.64%), and a gain of 1.51 Hedgerow Units (+13.77%)³ and 0.11 Watercourse Units (+3.48%).
- 41. A copy of the Statutory Biodiversity Metric Calculation Tool Excel spreadsheet (ref. BM-8455-01B) and Condition Assessment sheets (CA-8455-01) have been provided with this report and should be submitted digitally as part of the application.

Trading Rules

- 42. Habitat types are separated out into distinctiveness categories (Very Low to Very High) which dictate what mitigation/compensation is required for their loss. This is assessment is separate to the 'net unit change' score quoted above.
- 43. To satisfy Trading Rules, specific mitigation is only required for the loss of Medium distinctiveness habitat types and above. Trading Rules will automatically be satisfied for the loss of any Low distinctiveness habitat types once a no net loss position is reached. For the scheme assessed here, no such compensatory Units are required.

Requirements for Planning

- 44. There is mandatory requirement for all developments to demonstrate at least a 10% net gain in each unit measurement, as well as to satisfy Trading rules. A standard planning condition will be imposed on all decision notices to ensure this is met.
- 45. To achieve this here, a further **2.90 Habitat Units** and **0.21 Watercourse Units** will need to be secured.
- 46. These Units will need to be secured through offsetting, with offsite land Registered with Natural England. Once this offsetting has been secured, the Biodiversity Metric will need to be finalised before submission to the LPA.
- 47. A Net Gain Plan and Habitat Monitoring and Management Plan are likely to be required to discharge relevant pre-start planning conditions.

³Our report provides an estimate of the Site's value in Biodiversity Units. This is based on thorough assessment at the time of survey and using the information available at this time. In this assessment we have used the latest version of DEFRA's Biodiversity Metric Tool, the UK Habitats Classification, and relevant guidance. This assessment requires subjective judgments to be made in terms of habitat type and condition and could be

- 48. Provision should be made by the LPA and developer to secure the necessary gains through legal agreement - planning condition (for on Site gains), planning obligation or conservation covenant (for off-Site gains) - see further information section at the end of the report for more information on this.
- 49. A 30-year Habitat Monitoring and Management Plan (HMMP) may be required to discharge relevant pre-start planning conditions.

Figure 6 Biodiversity Metric Summary.

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.41		
	Hedgerow units	1.51		
	Watercourse units	0.11		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-1.64%		
	Hedgerow units	13.77%		
	Watercourse units	3.48%		
Trading rules satisfied?	No - Check Trading Summaries ▲			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	24.93	27.43	2.90
Hedgerow units	10.00%	10.98	12.08	0.00
Watercourse units	10.00%	3.29	3.62	0.21

open to other interpretations. Reliance on the Unit Score, or conversion of this into a monetary value, would be at the developer's own risk. Where conversion to monetary value is required, it is always advisable to get calculations checked independently.

Assumptions

50. Establishment of the post development value of the Site at this stage is necessarily based on several assumptions which we have set out below, please provide the additional information required against each if this is available:

	Factor	Information Required
1	<u>Timing</u> The BNG metric includes options to identify habitat creation which is deferred (by x years after it is lost) or habitat which is created in advance (elsewhere prior to its loss from Site). These are subject to multipliers and will affect your ultimate BNG score. Unless you have told us otherwise, we have assumed a 2-year build programme and a delay of 2 years between loss of habitat and creation of new. Calculations will need to be re-run if changes to the project plan result in a change to this figure.	Please provide a realistic timescale for the period between loss of habitat (Site clearance) and the completion of new on-Site habitat areas.
2	<u>Phasing</u> Unless you have told us otherwise, we have assumed that development will not be phased (in planning terms) and that habitat will be lost and created in a single phase.	Please confirm whether development will be phased.
3	<u>Habitat Retention</u> Unless you have provided a habitat retention plan showing areas where habitat can be retained undisturbed, we have assumed that all mapped habitat will be lost from the Site and then replaced.	Please provide a habitat retention plan showing area which can be retained unaffected by clearance, excavation, storage, compounds etc. Identify also any areas of temporary impacts - these may be impacted by the above but can be returned to the same habitat within 2 years.
4	<u>Other limiting factors</u> Ecological conditions are likely to be the primary factors determining the potential of the site to deliver Biodiversity Units, these would normally be established through a Preliminary Ecological Appraisal (PEA). Where a PEA has not been carried out, we have assumed that ecological factors are not limiting. Where a PEA has been carried out by a third party, we have assumed that the information provided is suitable and accurate. There are other limiting factors falling outside of the remit of ecological assessment which could also affect delivery, these may not be apparent to us at this stage. As part of any future management plans produced to deliver Biodiversity Units it will be necessary to assess information on (though not limited to) the following factors - any of which could have a bearing on the site's potential: • Designated Sites (these may have been considered if desk-study has been part of the scope) • Protected and Notable Species (these may have been considered if desk-study has been part of the scope)	Provide information and reports or references any of the factors which you know will be, or could be, limiting in terms of habitat creation.

	Factor	Information Required
	• Invasive and Non-native Species • Land tenure and public access • Climate • Geology / topography • Agricultural land status • Soils and substrates • Contaminated Land • Hydrology and Drainage • Flood Risk • Landscape Character and Designations • Historic Environment and Earth Heritage • Services and Infrastructure • Land ownership These factors may be outside of the remit of this report (especially where a PEA has not been produced) and the expertise of an ecologist. We cannot be responsible for the impact of any of these factors on the potential of the site to deliver Biodiversity Units. Where other information is not made available, we have assumed they are not limiting	

References

Chartered Institute of Ecology and Environmental Management (CIEEM). 2019. *Advice note: on the lifespan of ecological reports and surveys*. Winchester: Chartered Institute of Ecology and Environmental Management. [Online]. Available from: <https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/>

Ministry of Housing, Communities & Local Government. 2024. *National Planning and Policy Framework*. London: Her Majesty's Government. [Online]. Available from: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

The Statutory Biodiversity Metric User Guide. 2025. London: Department for Environment, Food and Rural Affairs (Defra). [Online]. Available from: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

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The Statutory Biodiversity Metric Condition Assessments. 2025. London: Department for Environment, Food and Rural Affairs (Defra). [Online]. Available from: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

Appendices

The following reports/digital documents have been provided alongside this report and should be read in conjunction with it:

- BM-8455-01B – Statutory Biodiversity Metric Calculation Tool
- CA-8455-01 – Statutory Biodiversity Metric Condition Assessments
- ER-8455-01C – Preliminary Ecological Appraisal

Habitat degradation

Within Schedule 14 of the Environment Act, which sets out the biodiversity gain condition for development, measures are included that allow planning authorities to recognise any habitat degradation since **30th January 2020** and to take the earlier habitat state as the baseline for the purposes of biodiversity net gain. In order to ascertain the habitats present and their condition on 30th January 2020, aerial imagery or data sets from that time could be used. 30th January 2020 is the relevant date as it was the day the Bill entered Parliament.

In 2023, the Levelling Up and Regeneration Act 2023 (LURA), introduced additional wording further tightening the law regarding degradation by extending the circumstances in which degradation can be addressed. This wording covered both authorised and unauthorised activity on onsite and offsite habitats, on or after **25th August 2023**.

Further information

Further useful information is available on legal agreements to secure Biodiversity Gains at:

- <https://www.gov.uk/guidance/legal-agreements-to-secure-your-biodiversity-net-gain>
- <https://naturalengland.blog.gov.uk/2024/03/04/securing-off-site-biodiversity-net-gain-expert-legal-perspectives/>

Appendix 1 - BNG Hierarchy

Level of Hierarchy	Advice provided at PEA/BNG Baseline Stage	Response in designs	Linked documents / plans
<i>First</i> Avoid	Clearance of the Medium-distinctiveness habitats - namely hawthorn scrub, mixed scrub and individual trees - should be avoided wherever possible, and minimised where it is not avoidable.	Almost all trees on-Site have been retained, with only two (T43 and T44) on the northern boundary mapped as removed. A large proportion of both scrub areas has also been retained.	Illustrative Landscape Masterplan dwg. P25_2353_EN_07A rev. A (Pegasus Group, December 2025)
<i>then</i> Enhance	Retained habitats on-Site should be enhanced where possible as an important source of Habitat Units post-development. The majority of the modified grassland (poor and moderate condition) and mixed scrub (poor condition), present the greatest opportunities for enhancement.	For the purposes of these calculations, small areas of modified and other neutral grassland surrounding the stream have been mapped as enhanced, as has the downstream (R3) section of the stream.	Illustrative Landscape Masterplan dwg. P25_2353_EN_07A rev. A (Pegasus Group, December 2025)
<i>then</i> Create	Where possible residual loss of Units should be made up for with Habitat Units generated through the creation of new habitats on-Site. Units may be generated through specific ecologically targeted habitat creation, such as wildflower grassland, and standard amenity habitats, such as amenity grassland and ornamental shrub. Woodland buffering could contribute to this process.	Given the stage of the development, no specific response has yet been made.	N/A
<i>then</i> Offset	If a 10% Net Gain cannot be achieved on-Site, any remaining deficit will need to be compensated for off-Site.	Given the stage of the development, no specific response has yet been made.	N/A