



## TECHNICAL NOTE: PRELIMINARY BIODIVERSITY NET GAIN (BNG) STRATEGY

<b>SITE NAME &amp; ADDRESS</b>	Land at Twin Brook Business Park (Unit 12), Twin Brook Road, Twin Brook Road, Clitheroe, BB7 1QX
<b>DEVELOPMENT PROPOSAL</b>	Extension of existing unit including access and parking
<b>PLANNING REFERENCE</b>	Not yet registered
<b>DATE</b>	25 March 2026

### 1. INTRODUCTION

Knight Sky Ecology Ltd was commissioned to provide a BNG strategy for the proposed development at Unit 12, Twin Brook Business Park. The BNG strategy includes the submission of the following documents:

- The Statutory Biodiversity Metric calculation tool (hereafter referred to as ‘the Biodiversity Metric’)
- Habitat condition assessment
- UK Habitat Classification map – Baseline (Figure 1)
- UK Habitat Classification map – Post-development (Figure 2)

In England, the primary legislation for the statutory framework for BNG is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and was amended by the Levelling Up and Regeneration Act 2023.

Under the statutory framework for BNG, subject to some exceptions, every planning permission is subject to a 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 on-site habitat. This increase can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or through statutory biodiversity credits.

This document has been produced to provide an overview of the BNG strategy and to provide a clear approach to how the biodiversity gain condition can be met.



## 2. METHODS

The latest version of the Biodiversity Metric and User Guide (3 July 2025) has been accessed from: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

The extent of the baseline habitat map (Figure 1) and post development habitat map are based on the existing and proposed drawings provided by the agent and as submitted with the application. The habitat maps include all areas within the red line boundary.

### **Desk Study**

The Multi-Agency Geographic Information for the Countryside (MAGIC) mapping tool (Available from: <https://magic.defra.gov.uk/>) was used to search for ecological information contained within the following datasets:

- Statutory designated sites for nature conservation (e.g. Sites of Special Scientific Interest (SSSI)) including SSSI Impact Risk Zones - to assess for likely impacts on SSSI.
- Priority habitats (as listed within Section 41 of the Natural Environment and Rural Communities Act 2006) within a 250m radius.

Geospatial datasets for Biological Heritage Sites and the Lancashire Ecological Network were accessed from [here](#).

### **Habitat Assessment**

A site walkover was undertaken on 25<sup>th</sup> February 2026 by Ryan Knight MCIEEM (Full member of the Chartered Institute of Ecology and Environmental Management). All habitats within the site were described and mapped using UK Habitat Classification (UKHab) Version 2 definitions (UKHab Ltd, 2023).

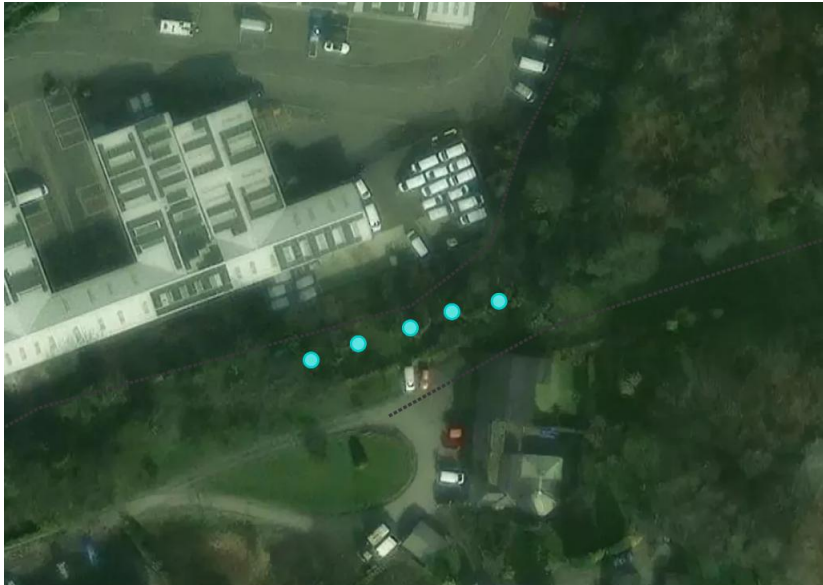
The assessment was undertaken during the winter period. However, the habitats present within the site were very limited with much of the ground having been cleared (see Section 3). The timing of the survey was therefore not considered to constrain the accuracy or reliability of the assessment.

### **Watercourse Assessment**

Mearley Brook runs east to west along the full length of the southern boundary of the development site (approximately 90m). A River Condition Assessment of the watercourse was undertaken using the Modular River Physical (MoRPh) survey methodology. This approach evaluates the physical and ecological characteristics of the riparian corridor, including land up to 10m from the bank edge. It also records the extent of channel and bankside modification, the presence and influence of structures such as bridges, and any invasive non-native species (INNS).

MoRPh guidance requires a minimum of five survey sections (sub-reaches) to be completed in order to cover at least 20% of the total watercourse length. Five assessment points were therefore surveyed along the watercourse, and their locations are shown in Figure 2.1 below.

**Figure 2.1. River condition assessment points**



The baseline survey information for the watercourse was transposed into the Biodiversity Metric. The assessment was undertaken on 25<sup>th</sup> February 2026 by Ryan Knight MCIEEM who is fully qualified to undertake River Condition Assessments for the purposes of BNG.

### **3. BASELINE VALUES**

#### **Designated Sites**

The Impact Risk Zones for SSSI indicate that at the location selected, the proposed development is unlikely to have a harmful effect on terrestrial SSSI and the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin. ]

There are no Biological Heritage Sites (BHS) within or immediately adjacent to the proposal site. The nearest BHS is Salthill Quarry, located approximately 75 m to the north. This site is designated for its artificial habitat features and species-rich grasslands. Potential adverse effects on this BHS can be discounted due to the absence of any functional ecological connectivity between the proposal site and the designated area.

#### **Priority Habitats**

There are no priority habitats within the site. The area of woodland to the direct east is listed as deciduous woodland on the MAGIC database.

#### **Lancashire Ecological Network (Woodland & Grassland)**

The site is not within the network.

#### **Habitat Degradation**

The business unit proposed for extension was constructed between 2016 and 2018. Following completion of the development, a margin of land between Mearley Brook and the southern boundary of the units was retained as open space, within which a Public Right of Way runs adjacent to the river.

At the time of the site visit, the margin of land between the site boundary fence and the river footpath had been cleared of vegetation. Based on the available evidence, it is estimated that this area previously



supported species-poor rank grassland, tall forbs, ruderal vegetation and occasional bramble, representing a typical assemblage associated with footpath margins, ground disturbance and nutrient enrichment. In addition, approximately four small trees appear to have been removed. An uprooted alder located on the site margins was the only remaining physical evidence of this clearance during the survey. However, the approximate locations of these trees are shown on the existing plans and elevations figure along with Google Earth imagery. These trees are assessed to have been small and in moderate condition. Plates 3.1 and 3.2 provide examples of the area from 2020 and 2026.

Schedule 14 of the Environment Act 2021, which sets out the biodiversity gain condition for development, includes measures allowing planning authorities to recognise any habitat degradation occurring since 30 January 2020 and to take the earlier habitat state as the baseline for BNG purposes. In accordance with this requirement, the biodiversity value of the land has been accounted for retrospectively within the Biodiversity Metric.

**Plate 3.1.**

Aerial image from 24/04/2020. Yellow boundary denotes cleared area of vegetation (not the planning boundary).



**Plate 3.2.**  
Photo of cleared  
vegetation from  
25/02/2026.



### Habitats

Photos are provided in Appendix A for context and supporting information for the assessment and Figure 1 in Appendix B provides an overview of the habitat baseline.

#### 81 Ruderal or ephemeral / 16 tall forbs / h3d bramble scrub

This habitat has been assessed retrospectively. It is considered highly likely that the habitat was in poor condition prior to clearance. Remnant and emerging vegetation within the cleared area included frequent bramble, spear thistle, rosebay willowherb, hogweed, common nettle, broadleaved dock, cleavers, cocks-foot, creeping buttercup and Himalayan balsam.

#### Ui1b5 Building / u1b6 Other developed land / u1c Artificial unvegetated, unsealed surface

The existing boundary of the business unit comprises parking areas and general hardstanding. A gravel footpath also runs along the river corridor.

#### 847 Introduced shrubs

A section of low-maintenance ornamental landscaping is present within the development boundary, associated with the business park. These areas support a typical mix of non-native, low-growing shrubs, with woodchip mulch used to suppress weed growth.

#### w1g Other broadleaved woodland / 32 scattered trees

Immediately south of the development boundary, a linear belt of trees follows the course of Mearley Brook. This feature comprises predominantly young to semi-mature sycamore, willow, hawthorn, alder and ash. At the western extent, the tree line broadens slightly, and this wider section appears to fall within the development boundary. Mature trees in this area included a single conifer, hawthorn, ash, willow and alder. Ground flora was dominated by wild garlic, with occasional Lords-and-Ladies and dog's mercury.



In this location, the UKHab category w1g Other broadleaved woodland is considered the most appropriate classification, although both the category and the condition criteria only partially align with the small extent of the habitat. The woodland is assessed to be in poor condition, largely due to its limited size and structural constraints.

Other trees within the site included a small silver birch on the fence line and three very small planted birch trees within the landscaped area. A further four small trees have been included retrospectively in the Biodiversity Metric to account for pre-clearance conditions.

The biodiversity value of the habitats within the site is **0.38 units**.

## **Watercourses**

### R2b Other rivers and streams

The development boundary is located approximately 4–5 m from the bank edge of Mearley Brook. The watercourse is considered to be a Type F river, characterised as a straight to sinuous channel with very few meanders. The banks have been modified through the construction of small earth flood embankments, a short section of concrete wall revetment, and additional bank-strengthening measures including builders' rubble (large stones and bricks, some of which have been washed into the channel). At least two very small drainage outfalls were recorded on the south bank. Collectively, the watercourse encroachment is categorised as major.

When assessing riparian zone encroachment (i.e., land within 0–10 m of the bank top), the Biodiversity Metric user guide states that “*Riparian zone encroachment is any feature or intervention (within the riparian zone) that reduces the quantity, quality or ecological function of the riparian habitat.*”

Within 0–10 m of the south bank (opposite bankside to the development), the presence of roads, a garden lawn and a dwelling constitutes major encroachment.

On the development-side bank, a gravel footpath is located approximately 3–4 m from the bank top. However, in accordance with the Biodiversity Metric user guide, established footpaths within the riparian zone are not recorded as encroachment in the baseline assessment. The user guide does not fully explain this distinction, despite the fact that the presence of a gravel footpath is recorded negatively within the River Condition Assessment criteria (bank-top managed cover). The footpath widens into a larger vehicle access track at the western boundary of the site.

The majority of the existing boundary fence line lies approximately 10–12 m from the bank top, and therefore outside the riparian zone. As described above, vegetation between the bank top and the boundary fence had been cleared prior to the survey. Due to this site clearance, it was very difficult to ascertain the level of habitat management or land use within this margin in order to assess the level of existing encroachment. As a precaution, a no encroachment category has been applied.

Young shoots of Himalayan balsam were observed throughout the riparian zone. This is a non-native invasive species (INNS) listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), making it an offence to plant or otherwise cause it to spread in the wild. It is a highly invasive, capable of dominating riverbanks.

Using the Cartographer database, the watercourse is classified as being **in fairly poor condition, with a score of 0.18**. The biodiversity value of the watercourse is **0.34 units**



## 4. POST DEVELOPMENT VALUES (HABITAT CREATION)

### Habitats

The proposed development includes the extended unit, access and parking. Only a minimal extent of planting areas are designed in the layout. This planting has been assumed to be a typical range of introduced shrubs (as existing in other areas of the business park).

The biodiversity value of the habitats post-development would be **0.03 units**.

### Watercourse

The proposed development will increase encroachment within the riparian zone from *none* to *majoras* there will be buildings and hardstanding within 5-6m of the bank top. Without any interventions, the biodiversity value of the watercourse will be 0.3 units (a loss of 0.05 units – 12.79%).

However, in this instance, the development can offset the biodiversity loss via a simple intervention in the form of completely removing Himalayan balsam from the river margins. With this enhancement measure, the biodiversity value of the watercourse would be **0.41 units** (an increase in 0.05 watercourse units (14.94%).

## 5. CONCLUSIONS

### Habitats

The Biodiversity Metric has calculated that the development proposals will result in a net loss of 0.42 habitat units (- 94%).

The development will therefore not meet the biodiversity net gain condition on-site as the required 10% net gain target would not be achieved. **A total of 0.46 habitat units are required to achieve net gain.**

Please note that the Biodiversity Metric has been completed without reference to an Arboricultural Impact Assessment. As such, it has been assumed that a very small loss of woodland habitat would occur, amounting to 0.06 units. It may be possible to retain the trees within the final design, which could reduce this deficit.

### Watercourse

With the complete removal of Himalayan balsam on the site, the Biodiversity Metric has calculated that the development proposals will result in a net gain of 0.05 units (14.94%). The development will therefore meet the biodiversity net gain condition on-site provided that a management plan for Himalayan balsam is designed and undertaken.



## 6. RECOMMENDATIONS

### Off-site Net Gain (Habitats)

The development can deliver BNG off-site via the following two options:

**1)** The application will not currently achieve net gain within the (red line) development boundary. The applicant may wish to consider setting aside a separate land parcel under their ownership for the purposes of achieving net gain.

Any land proposed for use for off-site net gain must be a registered biodiversity gain site. To be eligible for registration on the biodiversity net gain site register, land must be secured by an appropriate legal mechanism. In order to register a biodiversity site and allocate to the development at the same time, a planning application decision notice is needed along with several other requirements (see – <https://www.gov.uk/guidance/register-a-biodiversity-site-and-allocate-to-a-development> ).

Further details on the baseline habitat value, proposed habitat creation measures, and a Habitat Management and Monitoring Plan (HMMP) are required for any off-site land. Off-site mitigation land must also be secured for a minimum period of 30 years.

**2)** The applicant may wish to consider purchasing of biodiversity units from a habitat bank. This is a very simple process which works as follows:

- The existing Biodiversity Metric (showing a deficit for habitat units) is forwarded to a habitat bank.
- The habitat bank provides a broken-down quote for supplying the required biodiversity units.
- In line with the requirements of Section 100 Environment Act 2021, habitat banks are governed under a standalone Conservation Covenants with a Responsible Body, as designated by Defra/Natural England. Each habitat bank is fully funded for its lifetime, including lease and management payments, habitat creation works, reporting, and monitoring.
- The quote represents the full cost of the units over the required 30-year period, and the habitat bank would take on the liability for all of the maintenance and management. There are no additional charges (e.g. no legal, agency costs) and there are no ongoing recurring payments. The purchase price would be a one-off payment and would provide the applicant with a “clean break”.
- The biodiversity units are fully purchased following planning permission. There is an option to reserve the units via a deposit prior to planning consent. The reservation fee is not refundable if planning permission is refused.
- Once purchased, the applicant would receive a reference number and proof of purchase. This proof of purchase and the number of units would be inputted into the Biodiversity Gain Plan (see below). The Biodiversity Gain Plan and amended Biodiversity Metric must be submitted prior to commencement (as stated in a mandatory planning condition).



### **Invasive Non-native Species Management Plan (Himalayan balsam)**

Himalayan balsam is listed on Schedule 9, Part II of the Wildlife and Countryside Act 1981, making it an offence under Section 14 of the Act to plant or otherwise cause this species to grow in the wild. Any soil or plant material contaminated with Himalayan balsam is classed as controlled waste. The Environmental Protection Act 1990 sets out a number of legal provisions relating to the handling of controlled waste, creating offences for the deposit, treatment, keeping or disposal of such waste without an appropriate permit. Material containing Himalayan balsam must therefore be disposed of safely at a licensed landfill site in accordance with the Environmental Protection Act (Duty of Care) Regulations 1991.

The applicant should be aware of the presence of this species and implement precautionary measures to prevent its spread, particularly off-site. To support delivery of net gain for the watercourse, it is recommended that an INNS Management Plan is prepared as a post-permission requirement, setting out how Himalayan balsam will be treated and removed from the site. A further site visit during the summer months would be beneficial to determine the full extent of the species along the river corridor.

### **Biodiversity Gain Plan**

The statutory framework for biodiversity net gain requires a Biodiversity Gain Plan (BGP) to be submitted and approved by the planning authority to discharge the biodiversity gain condition prior to the commencement of development. The BGP should detail the measures undertaken to achieve the required 10% net gain as stated in this document.



**APPENDIX A: PHOTOS**

**Photos 1.**

View north-east  
from western  
extent of site.



**Photo 2.**

Ornamental  
shrubs and small  
trees on east  
boundary.





**Photo 3.**

View westwards  
along existing  
boundary fence.



**Photo 4.**

View eastwards  
over existing  
footpath and  
cleared site  
margins.





**Photo 5.**

Emerging  
Himalayan  
balsam on site  
margins.



**Photos 6a to 6c.**

Views of river.







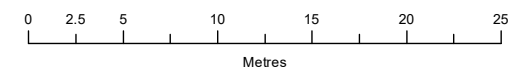
## **APPENDIX B: FIGURES (NEXT PAGE)**

- **FIGURE 1. UK HABITAT CLASSIFICATION MAP (BASELINE)**
- **FIGURE 2. UK HABITAT CLASSIFICATION MAP (POST-DEVELOPMENT)**



Survey Information

	Site boundary (2,080.6m <sup>2</sup> )
UKHab Habitat Survey	
	Mosaic of 81 - ruderal or ephemeral with 16 - tall forbs and h3d - bramble scrub (523.6m <sup>2</sup> )
	u1b5 - Building (486.4m <sup>2</sup> )
	u1b6 - Other developed land (616.5m <sup>2</sup> )
	u1c - Artificial unvegetated, unsealed surface (185.1m <sup>2</sup> )
	w1g - Other broadleaved woodland (139.6m <sup>2</sup> )
	847 - Introduced shrub (129.4m <sup>2</sup> )
	32 - Scattered tree (8)



PROJECT TITLE  
**LAND OFF TWIN BROOK ROAD, CLITHEROE**

DRAWING TITLE  
**Figure 1: UK Habitat Classification Map (Baseline)**

VER	DATE	REMARKS	Drawn	Checked
1.0	19/03/26	UKHab	MP	RK

DRAWING NUMBER:  
KSEcology/TwinBrook/UKHab

SCALE	1:400	PLOT SIZE	A3	DATUM	OSGB	PROJECTION	BNG
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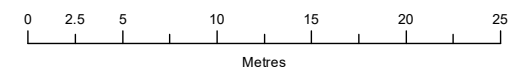
Source:  
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Survey Information

	Site boundary (2,080.6m <sup>2</sup> )
UKHab Habitat Survey	
	u1b5 - Building (1,112.4m <sup>2</sup> )
	u1b6 - Other developed land (836.0m <sup>2</sup> )
	847 - Introduced shrub (132.2m <sup>2</sup> )



PROJECT TITLE  
**LAND OFF TWIN BROOK ROAD, CLITHEROE**

DRAWING TITLE  
**Figure 2: UK Habitat Classification Map (Post-Development)**

VER	DATE	REMARKS	Drawn	Checked
1.0	19/03/26	Post-Development	MP	RK

DRAWING NUMBER:  
KSEcology/TwinBrook/Post-Development

SCALE	1:400	PLOT SIZE	A3	DATUM	OSGB	PROJECTION	BNG
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