



# Substation Relocation, North Manchester General Hospital Manchester Biodiversity Net Gain (BNG) Report

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TEP  
401 Faraday Street  
Birchwood Park  
Warrington  
WA3 6GA

Tel: 01925 844004  
Email: [tep@tep.uk.com](mailto:tep@tep.uk.com)

Offices in Warrington, Market Harborough, Gateshead, London and Cornwall

|                 |                                                          |
|-----------------|----------------------------------------------------------|
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| Office:         | Warrington                                               |
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Nothing in this report constitutes legal opinion. If legal opinion is required, the advice of a qualified legal professional should be secured.

## Contents

## Page

|     |                                                 |    |
|-----|-------------------------------------------------|----|
| 1.0 | INTRODUCTION .....                              | 2  |
|     | Commission.....                                 | 2  |
|     | Background .....                                | 2  |
|     | Relevant Legislation .....                      | 2  |
|     | Local Policy .....                              | 4  |
|     | Site Description.....                           | 5  |
|     | Proposed Development .....                      | 5  |
|     | Objectives.....                                 | 6  |
| 2.0 | METHODS .....                                   | 7  |
|     | Ecological and Survey Reference Documents ..... | 7  |
|     | Survey Methods.....                             | 7  |
|     | BNG Assessment.....                             | 8  |
| 3.0 | BASELINE CONDITIONS .....                       | 11 |
|     | On-Site Baseline.....                           | 11 |
|     | Post Development Habitats .....                 | 11 |
| 4.0 | CHANGE IN ECOLOGICAL VALUE.....                 | 13 |
|     | Summary of Biodiversity Impact.....             | 13 |
|     | BNG Unit Net Change.....                        | 13 |
|     | Biodiversity Net Gain .....                     | 15 |
| 5.0 | IMPLEMENTATION, MANAGEMENT AND MONITORING ..... | 19 |
| 6.0 | BNG GOOD PRACTICE PRINCIPLES .....              | 20 |
| 7.0 | CONCLUSION .....                                | 22 |

## Figures

|                                                                                         |   |
|-----------------------------------------------------------------------------------------|---|
| Figure 1: Images showing northern (left) and southern (right) aspects of the site ..... | 5 |
|-----------------------------------------------------------------------------------------|---|

|                                                                                    |    |
|------------------------------------------------------------------------------------|----|
| Figure 2: Headline Results page from completed Statutory Biodiversity Metric ..... | 14 |
| Figure 3: BNG unit deficit to attain 10% Net gain .....                            | 15 |

## Tables

|                                                              |    |
|--------------------------------------------------------------|----|
| Table 1: Appraisal against Ten Good Practice Principles..... | 20 |
|--------------------------------------------------------------|----|

## Appendices

- Appendix A: Statutory Biodiversity Metric (provided as separate document)
- Appendix B: Baseline Condition Assessment

## Drawings

- Drawing 1: G10823.002: Baseline UK Habitats
- Drawing 2: G10823.003: Baseline Condition & Significance
- Drawing 3: G10823.004: Proposed UK Habitats
- Drawing 4: G10823.005: Proposed Condition & Significance
- Drawing 5: G10823.006: Habitat Impact
- Drawing 6: Proposed Site Plan (Sheppard Robson Ref: 23135-SRA-NM172-00-DR-A-02002, Rev. P02)

# Executive Summary

|                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Introduction               | The Environment Partnership (TEP) was commissioned by Manchester University NHS Foundation Trust to undertake a Biodiversity Net Gain (BNG) assessment to inform a proposed full planning application for the relocation of a substation within North Manchester General Hospital, Delaunays Road, Manchester, M8 5RB. The new substation location will hereafter be referred to as the "site".                                                                                                                                                                                                                                                                 |
| Surveys                    | <ul style="list-style-type: none"> <li>UK Habitat Classification Survey – TEP 2024</li> <li>Habitat Condition Assessment – TEP 2024</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Baseline Assessment        | <p>The site measures approximately 0.26ha and contains:</p> <ul style="list-style-type: none"> <li>0.20ha of Developed land; sealed surface worth 0 area habitat units;</li> <li>0.04ha of Modified grassland in Poor condition worth 0.07 area habitat units;</li> <li>0.01ha of Modified grassland in Moderate condition worth 0.05 area habitat units;</li> <li>0.02ha of Other neutral grassland in Poor condition worth 0.06 area habitat units; and</li> <li>Four medium-sized urban trees and one small-sized urban tree, all in Good condition worth 0.83 area habitat units.</li> </ul> <p>The habitats on site are of Low strategic significance.</p> |
| Post Development           | All habitats within the site boundary will be lost, except for 0.02ha of other neutral grassland (G2), which will be retained. The only habitat to be provided within the post development proposals will consist of 0.25ha of developed land; sealed surface.                                                                                                                                                                                                                                                                                                                                                                                                  |
| Change in Ecological value | Based on the current assessment of the site and the latest proposals, a net loss of -94.08% (-0.95 area habitat units) would be delivered by the post-development proposals and the trading rules would not be satisfied. Post-development proposals must demonstrate an additional 1.05 area habitat units to achieve a 10% net gain.                                                                                                                                                                                                                                                                                                                          |
| Biodiversity Net Gain      | Due to the size of the site and the nature of the proposals, biodiversity net gain cannot be achieved on site. Therefore, an off-site mitigation strategy will be required. This report provides, at Chapter 4, various scenarios to deliver the off-site BNG at the NMGH campus. The final details of the off-site mitigation strategy including 30 year management arrangements, will be evidenced within a Biodiversity Gain Plan, which can be secured using the standard national planning condition attached to the application's decision notice.                                                                                                        |

This Executive Summary is not a substitute for the full report. Refer to the full text of this report for further detail.

# 1.0 Introduction

## Commission

- 1.1 The Environment Partnership (TEP) was commissioned by Manchester University NHS Foundation Trust to undertake a Biodiversity Net Gain (BNG) assessment to inform a proposed full planning application for the relocation of a substation within North Manchester General Hospital, Delaunays Road, Manchester, M8 5RB. The new location of the substation will hereafter be referred to as the "site".
- 1.2 The Statutory Biodiversity Metric published by Defra<sup>1</sup> has been used to assess the net gain output.

## Background

- 1.3 North Manchester General Hospital is proposing to relocate a substation. To facilitate these works, an existing building at the proposed location of the new substation is required to be demolished. A prior notification for demolition application (Ref: 141365/DEM/2024) was submitted to Manchester City Council covering several locations, including this location.

## Relevant Legislation

- 1.4 In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act (TCPA) 1990 (as inserted by Schedule 14 of the Environment Act 2021)<sup>2</sup>. A 10% net biodiversity net gain requirement is mandatory under the Environment Act 2021 for major and minor developments made under the TCPA 1990, subject to the confirmed exemptions. The 10% net gain is expected to become mandatory for Nationally Significant Infrastructure Projects in November 2025.
- 1.5 The BNG Regulations most directly relevant to planning are:
  - The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 - commence BNG for most types of new planning applications and provides transitional arrangements for section 73 permissions;

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<sup>1</sup> <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

<sup>2</sup> Environment Act 2021, 2021 CHAPTER 30 - <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 - prescribe exemptions for categories of development to which BNG does not apply;
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 which set out the modifications for irreplaceable habitat; and
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 - amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions in respect of applications for planning permission and the submission and determination of Biodiversity Gain Plans, as well as modifications of Schedule 7A of the Town and Country Planning Act 1990 for phased development.

1.6 National Planning Policy Guidance for BNG<sup>3</sup> details the statutory framework for net gain and advises how BNG should be applied through the planning process, including:

- consideration of the Biodiversity Gain Hierarchy<sup>4</sup> during site selection and design, prior to submission of a planning application
- conformance with National Planning Policy Framework 2024 (NPPF) and the mitigation hierarchy;
- how the Biodiversity Gain Objective of at least 10% gain should be proven using the statutory biodiversity metric<sup>5</sup>;
- advice regarding exemptions and examples of de minimis exemptions;
- approval of a Biodiversity Gain Plan once planning permission has been granted; and
- enforcement and monitoring.

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<sup>3</sup> Guidance Biodiversity net gain - <https://www.gov.uk/guidance/biodiversity-net-gain>

<sup>4</sup> As set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

<sup>5</sup> Guidance Calculate biodiversity value with the statutory biodiversity metric <https://www.gov.uk/guidance/biodiversity-metric-calculate-the-biodiversity-net-gain-of-a-project-or-development>

- 1.7 The Biodiversity Gain Hierarchy is distinct from the mitigation hierarchy. The Biodiversity Gain Hierarchy sets out a list of priority actions (which are not applicable to irreplaceable habitats):
- In relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
  - In relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.
- 1.8 The mitigation hierarchy is set out in the NPPF at Paragraph 193(a)<sup>6</sup>, which states that a planning application should be refused if significant harm to biodiversity resulting from the development cannot be:
1. avoided (through locating on an alternative site with less harmful impacts);
  2. adequately mitigated; or, as a last resort,
  3. compensated for.

## Local Policy

- 1.9 Aligning with the National Planning Policy Framework (NPPF) and Environment Act 2021, Manchester City Council explain their implementation of biodiversity net gain within Policy JP-G8 of the Places for Everyone Joint Development Plan<sup>7</sup>.
- 1.10 There are no specific references to a target requirement of biodiversity net gain within the Local Plan, so it is expected that the Mandatory 10% net gain has been adopted for this development. The strategy enforces that developments present no net loss and 10% net gain of biodiversity following the completion of planning projects and that planning applications can only be granted if the planning officer has received evidence that measurable net gains of biodiversity will be met.

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<sup>6</sup> NPPF Paragraph 193(a) <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>

<sup>7</sup> <https://www.greatermanchester-ca.gov.uk/media/2drduk0t/places-for-everyone-joint-development-plan-dec24.pdf>

## Site Description

- 1.11 The site lies within North Manchester General Hospital, Manchester and falls within the administrative area of Manchester City Council. The footprint of the site boundary measures 0.26ha and the approximate central grid reference is SD 84951 02421.
- 1.12 The site is dominated by developed land; sealed surface in the form of an antenatal centre, substations, generators, and associated paths. Additionally, the site contains small areas of modified and other neutral grassland, and five urban trees. The southern, western and eastern aspects of the site are enclosed by buildings, while the northern boundary adjoins a road. The wider landscape is dominated by buildings and road networks, with occasional green space.



*Figure 1: Images showing northern (left) and southern (right) aspects of the site*

## Proposed Development

- 1.13 It is proposed to relocate a substation to the site. This will involve the demolition of the existing antenatal centre, for which a prior notification has already been submitted (Ref: 141365/DEM/2024), and the loss of most of the existing soft landscaping and five urban trees. The proposed development plans are detailed in the Proposed Site Plan produced by Sheppard Robson (Sheppard Robson Ref: 23135-SRA-NM172-00-DR-A-02002, Rev P02).

## Objectives

- 1.14 This report details the ecological surveys undertaken to establish a baseline position, and what the anticipated impacts are.
- 1.15 The aims of this report are to:
- Set out the methods used to assess the habitat baseline of the Scheme.
  - Set out the methods and assumptions used to assess the post development habitat scoring of the Scheme.
  - Determine if the BNG Objective (at least 10% gains) is delivered as a result of the Scheme designs and any offsetting proposed;
  - Identify any outstanding BNG shortfalls and how these could be overcome to deliver the BNG Objective; and
  - Demonstrate how the BNG good practice principles for development have been addressed.

## 2.0 Methods

### Ecological and Survey Reference Documents

2.1 To support this assessment the following ecological survey reports were reviewed:

- Preliminary Ecological Appraisal Report – RSK 2021<sup>8</sup>
- Environmental Impact Assessment Screening Report – Turley 2024<sup>9</sup>
- Biodiversity Net Gain Feasibility Report – RSK 2024<sup>10</sup>
- Site Tree Constraints Appraisal – RTS 2024<sup>11</sup>

### Survey Methods

#### Desk Study

2.2 Information regarding planning policies, historic species records and protected sites was collated from a variety of sources. The potential presence of irreplaceable habitats<sup>12</sup> was reviewed using Natural England's Priority Habitat Inventory layers and other open source data available to view on Magic<sup>13</sup>.

#### UK Habitat Survey

2.3 The updated UK Habitat survey was undertaken by a suitably qualified and experienced TEP Ecologist (FISC Level 4) on 11th December 2024 using the standard UK Habitat Classification (UKHab) assessment method and Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017b). This method records the habitat types present on site, based

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8 RSK (2021) North Manchester General Hospital - Preliminary Ecological Appraisal Report, REV01, 2481604. Helsby: RSK Biocensus.

9 Turley (2024) Environmental Impact Assessment (EIA) Screening Report – North Manchester General Hospital North Zone Demolition Works, CENM3005. Manchester: Turley.

10 RSK (2024) North Manchester General Hospital – Biodiversity Net Gain Feasibility Report, 2481796. Helsby: RSK Biocensus.

11 Rowbottoms Tree Services Ltd. (2024) Site Tree Constraints Appraisal – North Manchester General Hospital, Delaunay's Road, Crumpsall, M8 5RB, Rev. 6, RTS/14052024-006. Manchester: Rowbottoms Tree Service Ltd.

12 Irreplaceable habitats include: ancient woodland; ancient and veteran trees; blanket bog; limestone pavements; coastal sand dunes; spartina saltmarsh swards; mediterranean saltmarsh scrub; lowland fens - <https://www.gov.uk/guidance/irreplaceable-habitats>

13 [www.magic.gov.uk](http://www.magic.gov.uk)

on the UK Habitat Classification Field Key<sup>14</sup>. Plant species are identified in accordance with Stace (2010)<sup>15</sup> and recorded as target notes using the DAFOR scale<sup>16</sup>.

## Condition Assessment

- 2.4 Condition assessment surveys of the area-based habitats present pre-development were undertaken by a suitably experienced and qualified TEP Ecologist (FISC Level 4) on 11th December 2024. The condition assessments were undertaken using guidance presented in the Statutory Biodiversity Metric User Guide<sup>17</sup> and the Statutory Biodiversity Metric condition assessments<sup>18</sup>.

### Limitations

- 2.5 The latest UK Habitat survey and Condition assessment took place outside of the optimal survey season (April-mid-October). Therefore, reference has been made to historical habitat surveys performed for the site to inform the previous BNG report (2024, RSK Ref: 2481796) and the PEA report (2021, RSK Ref: 2481604). Furthermore, a precautionary approach to habitat classification and condition assessment has been taken.

## BNG Assessment

- 2.6 The site was assessed in December 2024 using the Statutory Biodiversity Metric calculator tool<sup>19</sup> and condition assessments following the User Guide.
- 2.7 The principles of biodiversity net gain as set out in the BNG Good Practice Guidelines<sup>20</sup> have been considered throughout this process.

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14 UK Hab Field Key V2.1 July 2023

15 Stace, C. (2010) New Flora of the British Isles. 3rd Ed. Cambridge University Press

16 DAFOR = Dominant, Abundant, Frequent, Occasional & Rare

17 Statutory biodiversity metric: *user guide* (August 2024)

18 Statutory biodiversity metric: *condition assessments* (August 2024)

19 Statutory biodiversity metric: *calculation tool (macro enabled)*

20 CIEEM, IEMA & CIRIA (2019). Biodiversity Net Gain. Good Practice Principles for Development. A Practical Guide

## Determining Strategic Significance

- 2.8 Strategic significance was determined through a thorough desktop review of local planning policy and other relevant documentation. The desk-based assessment provides full details of local policy and legislation covering the site. This includes biodiversity policies and the policies map within the Manchester City Council Local Plan - Core Strategy (adopted 11<sup>th</sup> July 2012) and the Places for Everyone Joint Development Plan (adopted 21<sup>st</sup> March 2024).
- 2.9 For the purpose of the BNG Assessment particular reference has been paid to the relevant green infrastructure and other ecology specific policies within the Manchester City Council Local Plan – Core Strategy:
- EN9 – Green Infrastructure
  - EN11 – Quantity of Open Space, Sport and Recreation
- 2.10 The following relevant policies have also been considered within the Places for Everyone Joint Development Plan:
- JP-G7 – Trees and Woodland
  - JP-G8 – A Net Enhancement of Biodiversity and Geodiversity
- 2.11 Consideration has also been given to the location of Local Wildlife Sites, as well as county wide and nationally designated wildlife sites, specifically where they are referenced in local policy as providing important connectivity.
- 2.12 Strategic significance utilises published local strategies and objectives to identify local priorities for targeting biodiversity and nature improvement. Strategic significance will be high if the habitat location is identified in local plans, strategies, or policies. Medium strategic significance should be used where habitat was deemed ecologically desirable for a particular habitat type such as acting as a wildlife corridor or buffer.
- 2.13 When assigning high, medium, and low strategic significance to habitats in both the baseline and the post development calculations for this site, the lack of proximity to high ecological value areas such as local wildlife sites, and the lack of ecologically valuable habitats ascertains that all habitats on the site were assigned low strategic significance.

## Post-Development Calculations

- 2.14 Post-development calculations have been based on the Proposed Site Plan (Sheppard Robson Ref: 23125-SRA-NM172-00-DR-A-02002, Rev P02).

- 2.15 The most appropriate UK Habitat Classification type for each post-development habitat parcel was assigned based on the site plan and discussions with the client, and a target condition was assigned based upon the condition assessment criteria for habitats within the Statutory Biodiversity Metric draft user guide and condition assessment instructions.
- 2.16 It is understood that the new areas of soft landscaping illustrated within the Proposed Site Plan are not expected to be maintained for thirty years. Therefore, for the purposes of calculating biodiversity net gain, these have been classified as developed land; sealed surface; other than one parcel of other neutral grassland (G2 on G10823.002) which is shown as retained within the Proposed Site Plan (Sheppard Robson Ref: 23125-SRA-NM172-00-DR-A-02002, Rev P02). It has been assumed that this parcel will be maintained for thirty years post-development.
- 2.17 Some areas of the baseline developed land; sealed surface, such as existing substations and paths, may be retained post-development. However, as this detail will not impact the outcome of the BNG Assessment, all of the baseline developed land; sealed surface has been treated as lost for the sake of clarity.

## 3.0 Baseline conditions

### On-Site Baseline

- 3.1 Details regarding the baseline habitats are provided in the following drawings:
- Baseline UK Habitats (TEP Ref: G10823.002)
  - Baseline Habitat Condition & Significance (TEP Ref: G10823.003)
- 3.2 The site measures approximately 0.26ha and is dominated by developed land; sealed surface. This habitat is surrounded by 0.01ha of modified grassland to the north (G3 on drawing G10823.002), 0.04ha of modified grassland to the south (G1), and 0.02ha of other neutral grassland to the south-east (G2). G1 and G2 were assessed to be in Poor condition, while G3 was assessed to be in Moderate condition.
- 3.3 Five urban trees are present within the site boundary (T1, T303, T304, T305.1 and T305.2). Four of these were Medium in size (T303, T304, T305.1 and T305.2) and one was Small (T1), with all of the trees assessed to be in Good condition. Please note: all tree identification numbers have been cross-referenced to match those within the previous Site Tree Constraints Appraisal (RTS Ref: RTS/14052024-006), with the exception of T1. T1 is a new tree identification number created for this report, as this tree had not previously been identified due to a lack of access at the time of the previous tree survey.
- 3.4 Full details regarding the classification of the habitats on site can be found in the Assessor Comments column within the completed Statutory Biodiversity Metric (provided as a separate document, TEP Ref: x10823.001) and a full account of the Condition Assessment of the habitats can be found within Appendix B.

### Post Development Habitats

- 3.5 Details regarding post-development habitats are provided in the following drawings:
- Proposed UK Habitats (TEP Ref: G10823.004)
  - Proposed Habitat Condition & Significance (TEP Ref: G10823.005)
  - Habitat Impact (TEP Ref: G10823.006)
  - Proposed Site Plan (Sheppard Robson Ref: 23125-SRA-NM172-00-DR-A-02002, Rev P02)

- 3.6 All habitats within the site boundary will be lost, except for the single 0.02ha parcel of other neutral grassland (G2), which will be retained. The only habitat to be provided within the post development proposals will consist of 0.25ha of developed land; sealed surface.
- 3.7 Details of the conversion from the masterplan to the UK Habitat classification along with the target condition are provided in the Assessor Comments within the completed Statutory Biodiversity Metric (provided as a separate document, TEP Ref: x10823.001).

## 4.0 Change in Ecological Value

- 4.1 A biodiversity assessment has been undertaken, using the Statutory Biodiversity Metric calculator, to quantify the change in biodiversity units for the planning application area between the pre-development baseline and post-development retained, enhanced, and created habitats. Detailed results of the assessment are provided in the Statutory Biodiversity Metric (provided as a separate document, TEP Ref: x10823.001)

### Summary of Biodiversity Impact

- 4.2 The site area totals 0.26ha, of which 0.02ha will be retained, which will be existing other neutral grassland (G2).
- 4.3 Permanent losses include 0.20ha of developed land; sealed surface and 0.05ha of modified grassland.

### BNG Unit Net Change

- 4.4 Figure 2 below illustrates the final headline result in unit net change for the site.

North Manchester General Hospital - Sub

Headline Results

Scroll down for final results ▲

Return to results menu

|                                                                                                          |                                |         |                                                   |
|----------------------------------------------------------------------------------------------------------|--------------------------------|---------|---------------------------------------------------|
| On-site baseline                                                                                         | Habitat units                  | 1.01    |                                                   |
|                                                                                                          | Hedgerow units                 | 0.00    |                                                   |
|                                                                                                          | Watercourse units              | 0.00    |                                                   |
| On-site post-intervention<br>(Including habitat retention, creation & enhancement)                       | Habitat units                  | 0.06    |                                                   |
|                                                                                                          | Hedgerow units                 | 0.00    |                                                   |
|                                                                                                          | Watercourse units              | 0.00    |                                                   |
| On-site net change<br>(units & percentage)                                                               | Habitat units                  | -0.95   | -94.08%                                           |
|                                                                                                          | Hedgerow units                 | 0.00    | 0.00%                                             |
|                                                                                                          | Watercourse units              | 0.00    | 0.00%                                             |
| On-site net gain is less than target set ▲                                                               |                                |         |                                                   |
| Off-site baseline                                                                                        | Habitat units                  | 0.00    |                                                   |
|                                                                                                          | Hedgerow units                 | 0.00    |                                                   |
|                                                                                                          | Watercourse units              | 0.00    |                                                   |
| Off-site post-intervention<br>(Including habitat retention, creation & enhancement)                      | Habitat units                  | 0.00    |                                                   |
|                                                                                                          | Hedgerow units                 | 0.00    |                                                   |
|                                                                                                          | Watercourse units              | 0.00    |                                                   |
| Off-site net change<br>(units & percentage)                                                              | Habitat units                  | 0.00    | 0.00%                                             |
|                                                                                                          | Hedgerow units                 | 0.00    | 0.00%                                             |
|                                                                                                          | Watercourse units              | 0.00    | 0.00%                                             |
| Combined net unit change<br>(Including all on-site & off-site habitat retention, creation & enhancement) | Habitat units                  | -0.95   |                                                   |
|                                                                                                          | Hedgerow units                 | 0.00    |                                                   |
|                                                                                                          | Watercourse units              | 0.00    |                                                   |
| Spatial risk multiplier (SRM) deductions                                                                 | Habitat units                  | 0.00    |                                                   |
|                                                                                                          | Hedgerow units                 | 0.00    |                                                   |
|                                                                                                          | Watercourse units              | 0.00    |                                                   |
| FINAL RESULTS                                                                                            |                                |         |                                                   |
| Total net unit change<br>(Including all on-site & off-site habitat retention, creation & enhancement)    | Habitat units                  | -0.95   |                                                   |
|                                                                                                          | Hedgerow units                 | 0.00    |                                                   |
|                                                                                                          | Watercourse units              | 0.00    |                                                   |
| Total net % change<br>(Including all on-site & off-site habitat retention, creation & enhancement)       | Habitat units                  | -94.08% | Total net gain achieved is less than target set ▲ |
|                                                                                                          | Hedgerow units                 | 0.00%   |                                                   |
|                                                                                                          | Watercourse units              | 0.00%   |                                                   |
| Trading rules satisfied?                                                                                 | No - Check Trading Summaries ▲ |         |                                                   |

| Unit Type                                                 | Target | Baseline Units | Units Required | Unit Deficit |
|-----------------------------------------------------------|--------|----------------|----------------|--------------|
| Habitat units                                             | 10.00% | 1.01           | 1.11           | 1.05         |
| Hedgerow units                                            | 10.00% | 0.00           | 0.00           | 0.00         |
| Watercourse units                                         | 10.00% | 0.00           | 0.00           | 0.00         |
| No additional hedgerow units required to meet target ✓    |        |                |                |              |
| No additional watercourse units required to meet target ✓ |        |                |                |              |

Figure 2: Headline Results page from completed Statutory Biodiversity Metric

- 4.5 The headline results show that there will be an overall net loss of -0.95 area habitat units (-94.08%) which is not compensated for within the post-development proposals.

## Trading Rules Summary

- 4.6 Due to a net loss of 0.12 area habitat units of modified grassland of low distinctiveness and five urban trees of medium distinctiveness worth 0.83 area habitat units, the trading rules cannot be satisfied.

## Biodiversity Net Gain

- 4.7 Based on the current assessment of the site and the latest proposals, a net loss of -94.08% (-0.95 area habitat units) would be delivered by the post-development proposals and the trading rules would not be satisfied. Figure 3 shows that the post-development proposals must demonstrate an additional 1.05 area habitat units to achieve a 10% net gain.

| Unit Type                | Target | Baseline Units | Units Required | Unit Deficit |
|--------------------------|--------|----------------|----------------|--------------|
| <i>Habitat units</i>     | 10.00% | 1.01           | 1.11           | 1.05         |
| <i>Hedgerow units</i>    | 10.00% | 0.00           | 0.00           | 0.00         |
| <i>Watercourse units</i> | 10.00% | 0.00           | 0.00           | 0.00         |

Figure 3: BNG unit deficit to attain 10% Net gain

- 4.8 Due to the size of the site and the nature of the proposals, it is considered unlikely that biodiversity net gain can be achieved on site. Therefore, an off-site mitigation strategy will be implemented.
- 4.9 It is understood that the full details of the off-site mitigation strategy will be committed to and evidenced within a Biodiversity Gain Plan, which can be captured via planning condition. Nevertheless, scenarios for off-site mitigation are provided below.

## Off-site habitat creation and enhancement

- 4.10 Where it has not been possible to achieve BNG on site, an off-site solution will be required. Off-site land could potentially be used to provide off-site units (outside of the application area) to deliver biodiversity net gain and satisfy the trading rules that on-site (within the application area) landscaping cannot.
- 4.11 In order to avoid negative spatial risk multipliers, off-setting will aim to take place within the Manchester City Council area and/or Manchester Conurbation National Character area, ideally within the NMGH campus. Where sufficient land can be allocated within these areas, the following scenarios would deliver a 10% net gain and satisfy the trading rules:

- Scenario 1 – The planting of 70 small urban trees in Moderate condition and the enhancement of 0.08ha of modified grassland from Poor to Good condition would satisfy the trading rules and achieve an overall net gain of +10.77% (+0.11 area habitat units).
- Scenario 2 – The planting of 85 small urban trees in Moderate condition would satisfy the trading rules and achieve an overall net gain of +10.95% (+0.11 area habitat units).
- Scenario 3 – A high distinctiveness habitat could be created. For example, if 0.27ha of modified grassland in Poor condition were lost and replaced with 0.27ha of traditional orchards in Moderate condition, this would satisfy the trading rules and achieve an overall net gain of +10.03% (+0.10 area habitat units).
- Scenario 4 – An existing high distinctiveness habitat could be enhanced from Poor to Moderate or Moderate to Good condition. For example, if 1.1ha of lowland mixed deciduous woodland is enhanced by one condition grade, this would satisfy the trading rules and achieve an overall net gain of +11.94% (+0.12 area habitat units).
- Mix of Scenarios – depending on the amount of off-site land available and its existing habitats, a mix of the above approaches could be used.

- 4.12 All of the above scenarios assume that off-site land will be of Low strategic significance. If the off-site land is in an area of High strategic significance, a smaller area of new habitat could deliver the 10% net gain, because the BNG process incentivises habitat creation in areas of high strategic significance.
- 4.13 An area along Delaunays Road to the north of the site was explored for its offsetting potential. This area is of High strategic significance as the majority of the land falls within the Irk River Valley, which is allocated under Policy BM2 of the MCC Local Plan – Core Strategy (adopted 11<sup>th</sup> July 2012).
- 4.14 Although this land does contain opportunities for habitat creation and enhancement, it is not considered feasible to plant a high number of individual trees in this area. This is because the number of trees required would cover more than 25% of the area and thus trigger the UK Habitat definition of ‘Other Woodland’, rather than ‘individual trees’, meaning that BNG trading rules would be failed. The space available is also unlikely to be adequate enough to create an area of lowland mixed deciduous woodland of high distinctiveness of sufficient quality and extent to be able to offset losses and satisfy trading rules.

- 4.15 There is an extensive area of lowland mixed deciduous woodland within the NMGH campus, mostly within the area of High strategic significance. It has not yet been subject to detailed condition assessment as this would require a springtime survey. However, it is possible that some areas could be enhanced to deliver the necessary 10% BNG uplift within trading rules.
- 4.16 A mix and match approach could be taken e.g. with some planting of individual trees and/or an orchard in the Delaunays Road area and some enhancement of LMDW woodland elsewhere on campus.
- 4.17 If any off-site areas are to be used for offsetting, their long-term management would need to be agreed via legal agreement, such as section 106 or a conservation covenant.
- 4.18 If an offsetting area was to be treated as within the planning application boundary, it could be treated as 'on-site' within the metric, and as such no legal agreement would be required. However, because the planning application area would be enlarged, the baseline biodiversity would be higher, so the 10% BNG requirement would also increase, potentially significantly.

### Purchasing off-site habitat units

- 4.19 If all opportunities for on-site and off-site habitat creation and enhancement have been exhausted without achieving the 10% BNG, the deficit in habitat units can be offset with additional units purchased from a suitable habitat bank.
- 4.20 As the units lost are associated with grassland and individual trees, these are the units that would be needed to satisfy the trading rules. Off-site units would be sourced as close to the site as possible with the aim that this will be within the Manchester City Council area or Manchester Conurbation National Character area to avoid negative spatial risk multipliers. Units would preferably be within North Manchester.
- 4.21 As a last resort, statutory Biodiversity Credits can be purchased from the government. These are recommended only when it is not possible to create habitats or purchase units from a suitable habitat bank. Biodiversity Credits must be purchased on a two-for-one basis, so for every unit of shortfall, two credits are required to be purchased. Therefore, to cover the full deficit of 1.05 area habitat units, achieve 10% net gain and satisfy the trading rules, 2.10 Biodiversity Credits would be required. This could be prohibitively expensive.

- 4.22 However, in TEP's opinion, the necessary biodiversity units may be able to be provided on the NMGH campus, a matter that can be secured through the Biodiversity Gain Plan planning condition prior to commencement of development.

## 5.0 Implementation, Management and Monitoring

- 5.1 This BNG assessment has been undertaken in support of a full planning application and post-development plans have been provided by the client. These have been assessed to indicate the condition of habitats that is expected to be achieved following completion of the development.
- 5.2 The proposals involve the retention of only a small area of on-site grassland; as this is not a 'significant' element of the site, it is not essential to produce a 30 year Habitat Management and Monitoring Plan for the on-site BNG.
- 5.3 However, some offsetting will be required, though habitat creation and enhancement. For the offset areas, a 30-year HMMP will be necessary. This can be provided alongside the Biodiversity Gain Plan that will form a standard pre-commencement condition attached to the application's decision notice.
- 5.4 The HMMP will need to include management prescriptions which aim to achieve the specific target condition for each habitat, based on the Statutory Biodiversity Metric condition criteria. The plan will also need to include the methods and reporting processes to be used for monitoring the success of habitat enhancement and creation along with options for remedial intervention where needed if a habitat is not achieving its targeted condition. Roles and responsibilities, along with financial and legal requirements should also be included.

## 6.0 BNG Good Practice Principles

6.1 An appraisal of the scheme against the ten good practice principles for development is set out in Table 1.

*Table 1: Appraisal against Ten Good Practice Principles*

| Good Practice Principle: |                                                                     | Commentary:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------|---------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.                       | Apply the mitigation hierarchy.                                     | It has been possible to retain 0.02ha of other neutral grassland within the site boundary. All other habitats will be lost and, due to the size of the site and the nature of the proposals, it is not feasible to mitigate for these losses on site. An off-site mitigation strategy will be implemented to achieve 10% net gain.                                                                                                                                                                                       |
| 2.                       | Avoid losing biodiversity that cannot be offset by gains elsewhere. | There are no irreplaceable habitats within the habitat baseline.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3.                       | Be inclusive and equitable.                                         | Conversations have been undertaken with the client and it is understood that the off-site mitigation strategy will aim to achieve the required habitat off-setting within the same LPA and/or NCA and enhance biodiversity in the local area.                                                                                                                                                                                                                                                                            |
| 4.                       | Address risks.                                                      | A precautionary approach to habitat condition assessment in the baseline assessment. Management and monitoring of any off-site habitats, to be included within the LHMP, will ensure remedial action is taken to enable target conditions to be achieved.                                                                                                                                                                                                                                                                |
| 5.                       | Make a measurable Net Gain contribution.                            | The headline results show that there will be an overall net loss of -0.95 area habitat units (-94.08%) which cannot be compensated for on site. To attain a 10% net gain, the client will commit to an off-site mitigation strategy which is expected to consist of either enhancing habitats on off-site land owned by the client, purchasing off-site habitat units from a suitable habitat bank, or a combination of the two. As a last resort, statutory Biodiversity Credits will be purchased from the government. |

| Good Practice Principle: |                                             | Commentary:                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.                       | Achieve the best outcomes for biodiversity. | The creation and/or enhancement of new habitats off-site, and aiming for these to be situated within the LPA and/or NCA area, will enhance connectivity and strengthen wildlife corridors in the local area.                                                                                                                                                                                                                     |
| 7.                       | Be additional.                              | There are no existing nature conservation outcomes on the site. The creation of new off-site habitats, aiming for these to be situated within the LPA and/or NCA area, and their management for biodiversity for the next 30 years add value to the local area.                                                                                                                                                                  |
| 8.                       | Create a Net Gain legacy.                   | Discussions have been held between TEP and the client regarding Biodiversity Net Gain and this has been a key consideration during the design of the landscaping scheme. A net gain legacy will be achieved through creation of a 30-year management plan which will ensure biodiverse and high quality habitats remain off site, and offer foraging, commuting, nesting and hibernation potential to a range of local wildlife. |
| 9.                       | Optimise sustainability.                    | The habitat enhancements will improve ecological corridors and semi-natural habitats within the local area, with benefits for connectivity to the wider area.                                                                                                                                                                                                                                                                    |
| 10.                      | Be transparent.                             | This report provides a transparent method for the BNG assessment ensuring that all stakeholders can follow the process through.                                                                                                                                                                                                                                                                                                  |

## 7.0 Conclusion

- 7.1 Based on the current assessment of the site and the latest proposals, a net loss of -94.08% (-0.95 area habitat units) would be delivered by the post-development proposals and the BNG trading rules would not be satisfied. Post-development proposals must demonstrate an additional 1.05 habitat units to achieve a 10% net gain.
- 7.2 Due to the size of the site and the nature of the proposals, biodiversity net gain cannot be achieved on site. Therefore, an off-site mitigation strategy will be required. This strategy will consist of either creating and enhancing habitats on off-site land owned by the client or purchasing off-site habitat units from a suitable habitat bank, or a combination of the two.
- 7.3 This report lists, at Chapter 4, different scenarios for achieving the 10% net gain within the NMGH campus. Full details of the off-site mitigation strategy will be agreed and evidenced within a Biodiversity Gain Plan which will be submitted for approval prior to commencement of development. Habitats contributing units to the scheme will be supported with a detailed 30-year Habitat Management and Monitoring Plan (HMMP), to be attached to the Biodiversity Gain Plan required by planning condition attached to the application's decision notice.

## Appendix A: Statutory Biodiversity Metric (provided as separate document)

## Appendix B: Baseline Condition Assessment

**Baseline**

Site Name: 10823 North Manchester General Hospital - Substation Relocation  
Metric Version: Statutory Metric  
Date of Survey: 11/12/2024  
Surveyor: MT

| Habitats          |                                     |                                                 |           | Criteria                                                                                                                                                                                                                   |                                                                                                                |                                                                                                                   |                                                                    |                                                                                |                                                           |                                     | Number of Passes | Score | Essential Criteria | Tree Size | Limitations/Notes                                                                                                                                                                                                                                               |
|-------------------|-------------------------------------|-------------------------------------------------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|--------------------------------------------------------------------------------|-----------------------------------------------------------|-------------------------------------|------------------|-------|--------------------|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Habitat Reference | Metric Classification               | Condition Criteria Sheet Used                   | Condition | A                                                                                                                                                                                                                          | B                                                                                                              | C                                                                                                                 | D                                                                  | E                                                                              | F                                                         | G                                   |                  |       |                    |           |                                                                                                                                                                                                                                                                 |
| G1                | Grassland - Modified grassland      | Grassland Low distinctiveness                   | Poor      | Fail - Grassland is borderline with 5 species per sqm. Due to the area being subject to heavy shading from trees and buildings, the parcel is not anticipated to reach 8 species per sqm within the optimal survey season. | Pass - Sward grades from mostly >7cm at western end to mostly <7cm at eastern end due to relaxed mowing regime | Pass - Scattered bramble scrub is present but accounts for <20% of total grassland area                           | Fail - Erosion present at eastern end due to high levels of access | Fail - Cover of bare ground >10% due to heavy shading from buildings and trees | Pass - No bracken present                                 | Pass - No invasive species observed | 4                | 0     | A - failed         |           | Classified as modified grassland due to <20% cover of herbs and <8 species per sqm (5 including suboptimal species)                                                                                                                                             |
| G2                | Grassland - Other neutral grassland | Grassland Medium/High/Very High distinctiveness | Poor      | Fail - Grassland is not a good example of its habitat type as it cannot be classified to level 5 within UKHab.                                                                                                             | Pass - Sward is varied due to >7cm areas of rock's-foot interspersed with low growing herbs and red fescue     | Pass - Bare ground present but <5%                                                                                | Pass - No bracken present                                          | Fail - Frequent creeping buttercup is present                                  | Fail - 7.3 species per sqm (excluding suboptimal species) |                                     | 3                | 0     | A - failed         |           | Classified as Other neutral grassland due to >20% cover of herbs, an abundance of non-agricultural grasses (Yorkshire fog, red fescue and poa sp.), >8 species per sqm (9.3 including suboptimal species) and <30% cover of perennial ryegrass and white clover |
| G3                | Grassland - Modified grassland      | Grassland Low distinctiveness                   | Moderate  | Pass - Borderline (5.5 species per sqm) and has been passed on precautionary basis due to the suboptimal timing of survey                                                                                                  | Fail - Sward is predominantly >7cm                                                                             | Pass - No scrub present                                                                                           | Pass - No damage evident                                           | Fail - No bare ground evident                                                  | Pass - No bracken present                                 | Pass - No invasive species observed | 5                | 0     | A                  |           | Classified as modified grassland due to >30% cover of perennial ryegrass and <8 species per sqm (5.5 including suboptimal species)                                                                                                                              |
| T1                | Individual trees – Urban tree       | Individual trees                                | Good      | Pass - Silver birch                                                                                                                                                                                                        | Pass - Automatic pass as individual tree                                                                       | Pass - Tree is mature as it is ≥ 2/3 of its expected fully mature height for the species, as per UKHab definition | Pass - No damaging activities evident                              | Fail - No features for vertebrates or invertebrates                            | Pass - Oversailing >20% vegetation                        |                                     | 5                | 0     |                    | Small     | Tree not included in previous arb report as area could not be accessed at time of arb survey (RTS Ref: RTS/14052024-006).                                                                                                                                       |
| T303              | Individual trees – Urban tree       | Individual trees                                | Good      | Pass - Hornbeam                                                                                                                                                                                                            | Pass - Automatic pass as individual tree                                                                       | Pass - Tree is mature as it is ≥ 2/3 of its expected fully mature height as per UKHab definition                  | Pass - No damaging activities evident                              | Pass - Cavity present in main stem, suitable for vertebrates and invertebrates | Pass - Oversailing >20% vegetation                        |                                     | 6                | 0     |                    | Medium    |                                                                                                                                                                                                                                                                 |
| T304              | Individual trees – Urban tree       | Individual trees                                | Good      | Fail - Norway maple                                                                                                                                                                                                        | Pass - Automatic pass as individual tree                                                                       | Pass - Tree is mature as it is ≥ 2/3 of its expected fully mature height as per UKHab definition                  | Pass - No damaging activities evident                              | Pass - Ivy present on main stem, suitable for vertebrates and invertebrates    | Pass - Oversailing >20% vegetation                        |                                     | 5                | 0     |                    | Medium    | Species ID differs to previous arb report (ycamore), as trees could not be accessed at time of arb survey and were surveyed from road (RTS Ref: RTS/14052024-006).                                                                                              |
| T305.1            | Individual trees – Urban tree       | Individual trees                                | Good      | Pass - Sycamore considered native as per UKHab guidelines, where it is defined as an archaeophyte and all archaeophytes are included within definition of the Native secondary code (S23)                                  | Pass - Automatic pass as individual tree                                                                       | Pass - Tree is mature as it is ≥ 2/3 of its expected fully mature height as per UKHab definition                  | Pass - No damaging activities evident                              | Pass - Ivy present on main stem, suitable for vertebrates and invertebrates    | Pass - Oversailing >20% vegetation                        |                                     | 6                | 0     |                    | Medium    |                                                                                                                                                                                                                                                                 |
| T305.2            | Individual trees – Urban tree       | Individual trees                                | Good      | Fail - Norway maple                                                                                                                                                                                                        | Pass - Automatic pass as individual tree                                                                       | Pass - Tree is mature as it is ≥ 2/3 of its expected fully mature height as per UKHab definition                  | Pass - No damaging activities evident                              | Pass - Ivy present on main stem, suitable for vertebrates and invertebrates    | Pass - Oversailing >20% vegetation                        |                                     | 5                | 0     |                    | Medium    | Species ID differs to previous arb report (sycamore), as trees could not be accessed at time of arb survey and were surveyed from road (RTS Ref: RTS/14052024-006).                                                                                             |

## Drawings

Drawing 1: G10823.002: Baseline UK Habitats

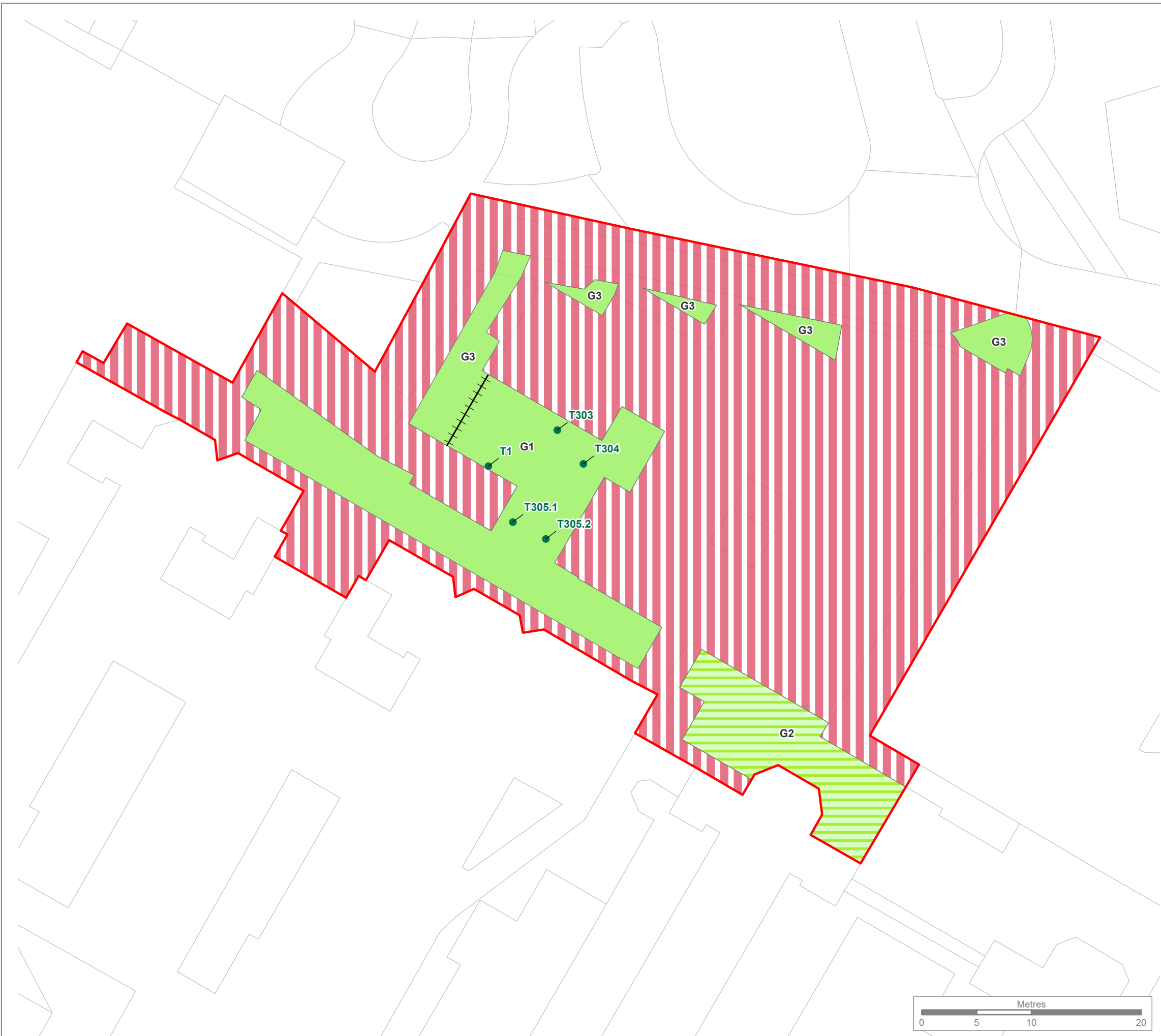
Drawing 2: G10823.003: Baseline Condition & Significance

Drawing 3: G10823.004: Proposed UK Habitats

Drawing 4: G10823.005: Proposed Condition & Significance

Drawing 5: G10823.006: Habitat Impact

Drawing 6: Proposed Site Plan (Sheppard Robson Ref: 23135-SRA-NM172-00-  
DR-A-02002, Rev. P02)



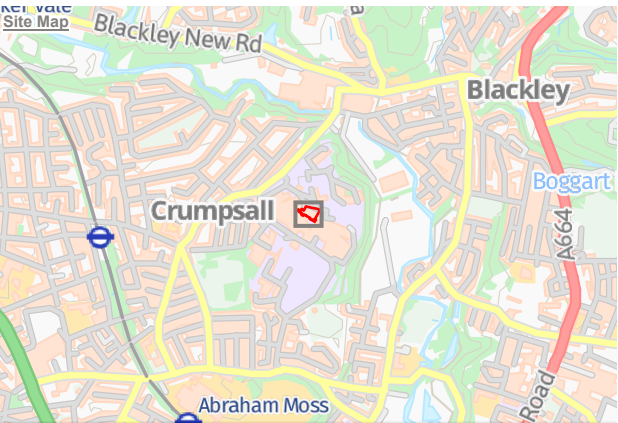
**KEY**

- Site boundary
- Urban tree
- Modified grassland
- Other neutral grassland
- Developed land, sealed surface

**Note:**  
The locations of habitats and habitat features are indicative.



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401 Faraday Street, Birchwood Park, Warrington, WA3 6GA  
Tel 01925 844004 e-mail tep@tep.uk.com www.tep.uk.com

Project  
**North Manchester General Hospital BNG Strategy**

Title  
**Baseline UK Habitats  
WP16**

Drawing Number  
**G10823.002**

|                    |                      |                       |                            |                           |
|--------------------|----------------------|-----------------------|----------------------------|---------------------------|
| Drawn<br><b>OH</b> | Checked<br><b>CW</b> | Approved<br><b>DM</b> | Scale<br><b>1:350 @ A3</b> | Date<br><b>21/01/2025</b> |
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**KEY**

Site boundary

**Individual Tree Condition**

● Good

**Habitat Condition**

Moderate

Poor

Not applicable - other

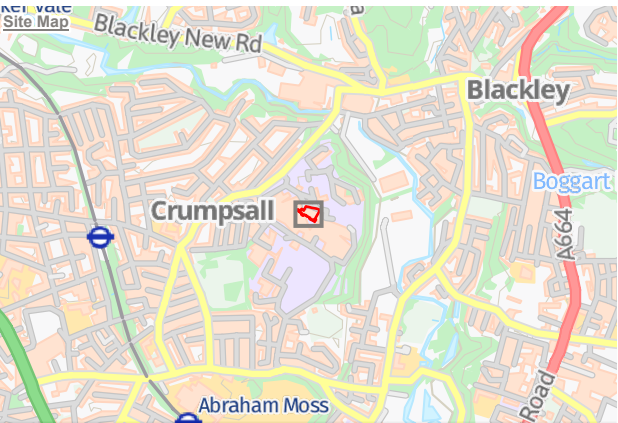
**Strategic Significance**

Area/compensation not in local strategy/no local strategy

**Note:**  
The locations of habitats and habitat features are indicative.



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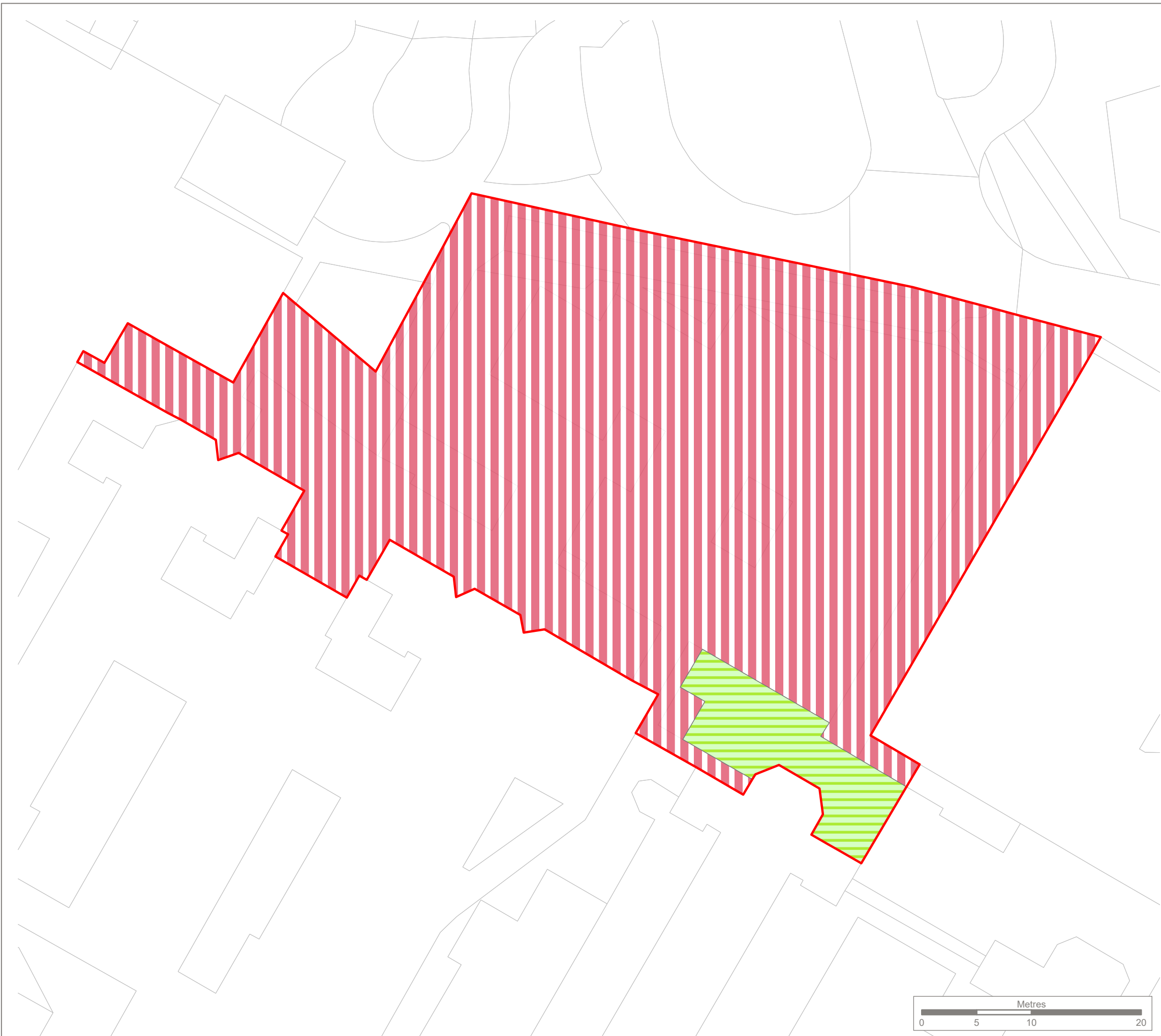
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North Manchester General Hospital BNG Strategy

Title  
Baseline Habitat Condition and Strategic Significance  
**WP16**

Drawing Number  
G10823.003

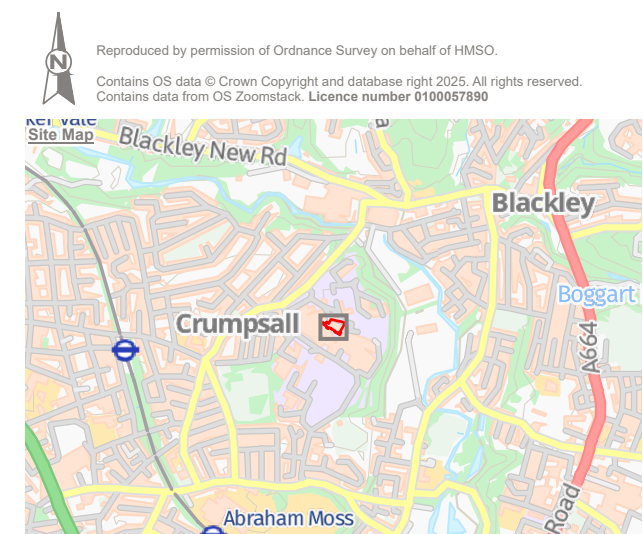
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**KEY**

-  Site boundary
-  Other neutral grassland
-  Developed land, sealed surface

**Note:**  
The locations of habitats and habitat features are indicative.



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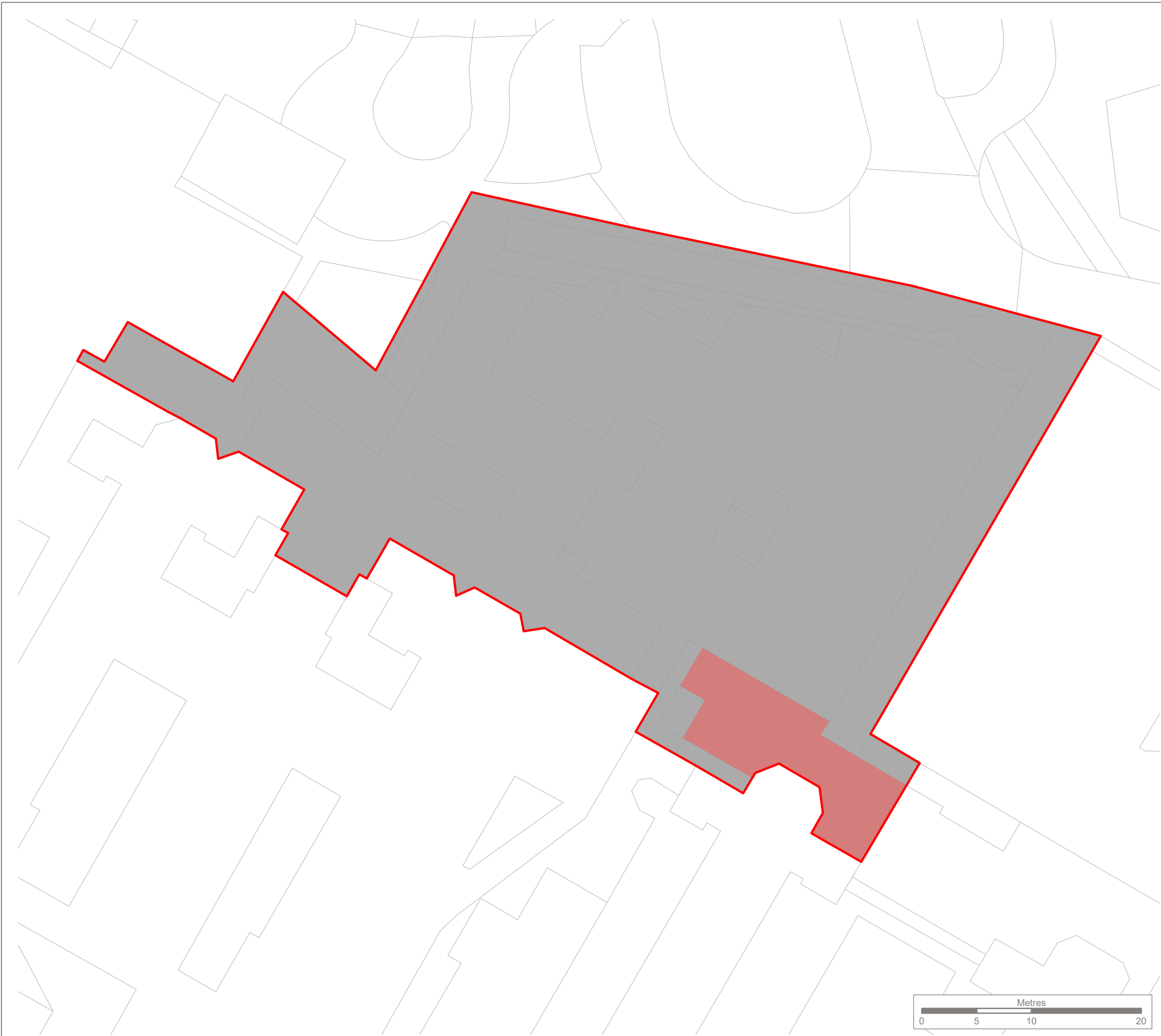
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Title  
**Proposed UK Habitats  
WP16**

Drawing Number  
**G10823.004**

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|-------|---------|----------|------------|------------|
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**KEY**

 Site boundary

**Habitat Condition**

 Poor

 Not applicable - other

**Strategic Significance**

All habitats with strategic significance value of 'area/compensation not in local strategy/no local strategy'

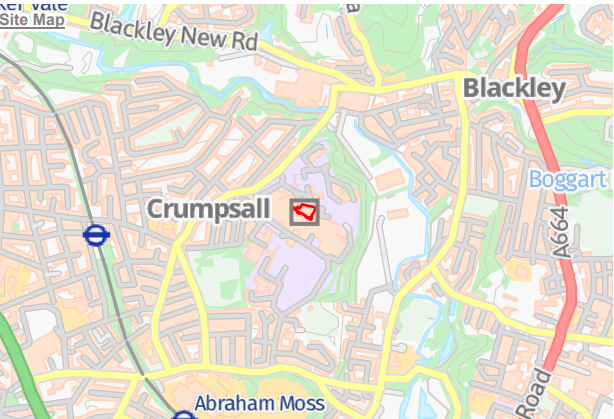
**Note:**

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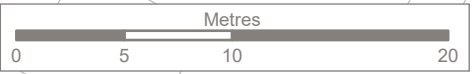
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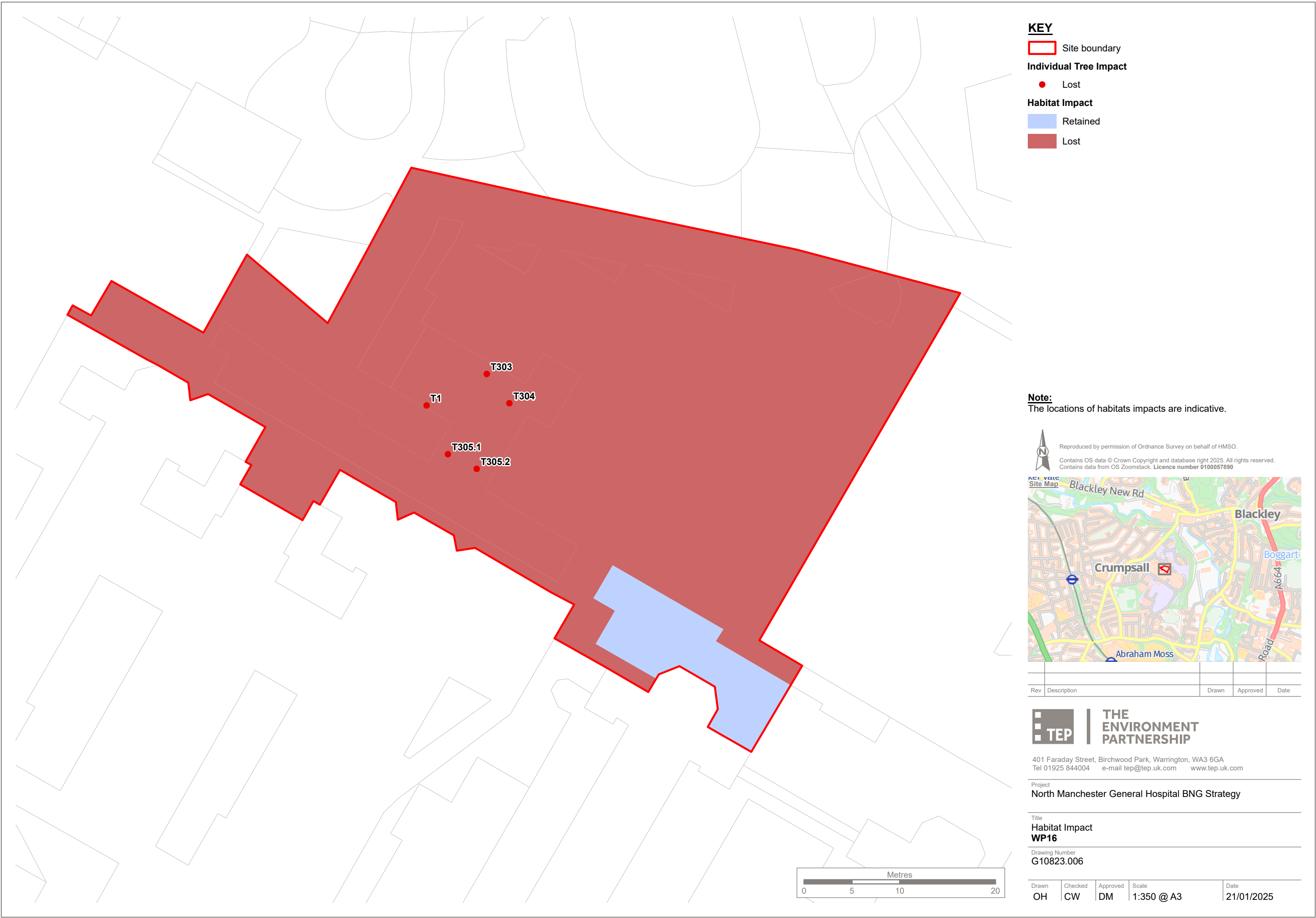
Project  
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Title  
**Proposed Habitat Condition and Strategic Significance  
WP16**

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**G10823.005**

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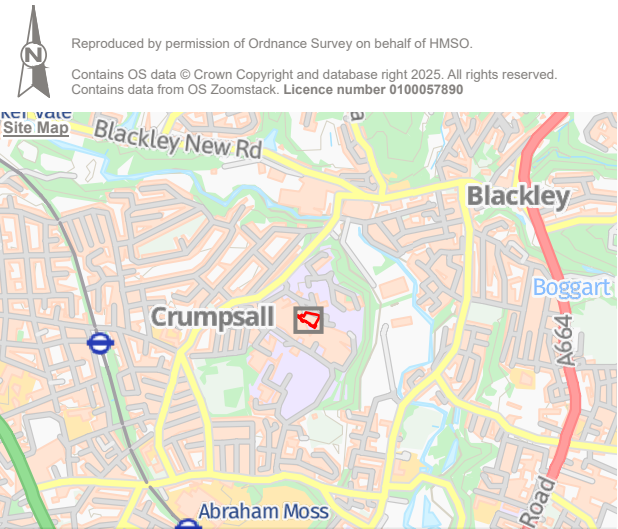




**KEY**

- Site boundary
- Individual Tree Impact
  - Lost
- Habitat Impact
  - Retained
  - Lost

**Note:**  
The locations of habitats impacts are indicative.



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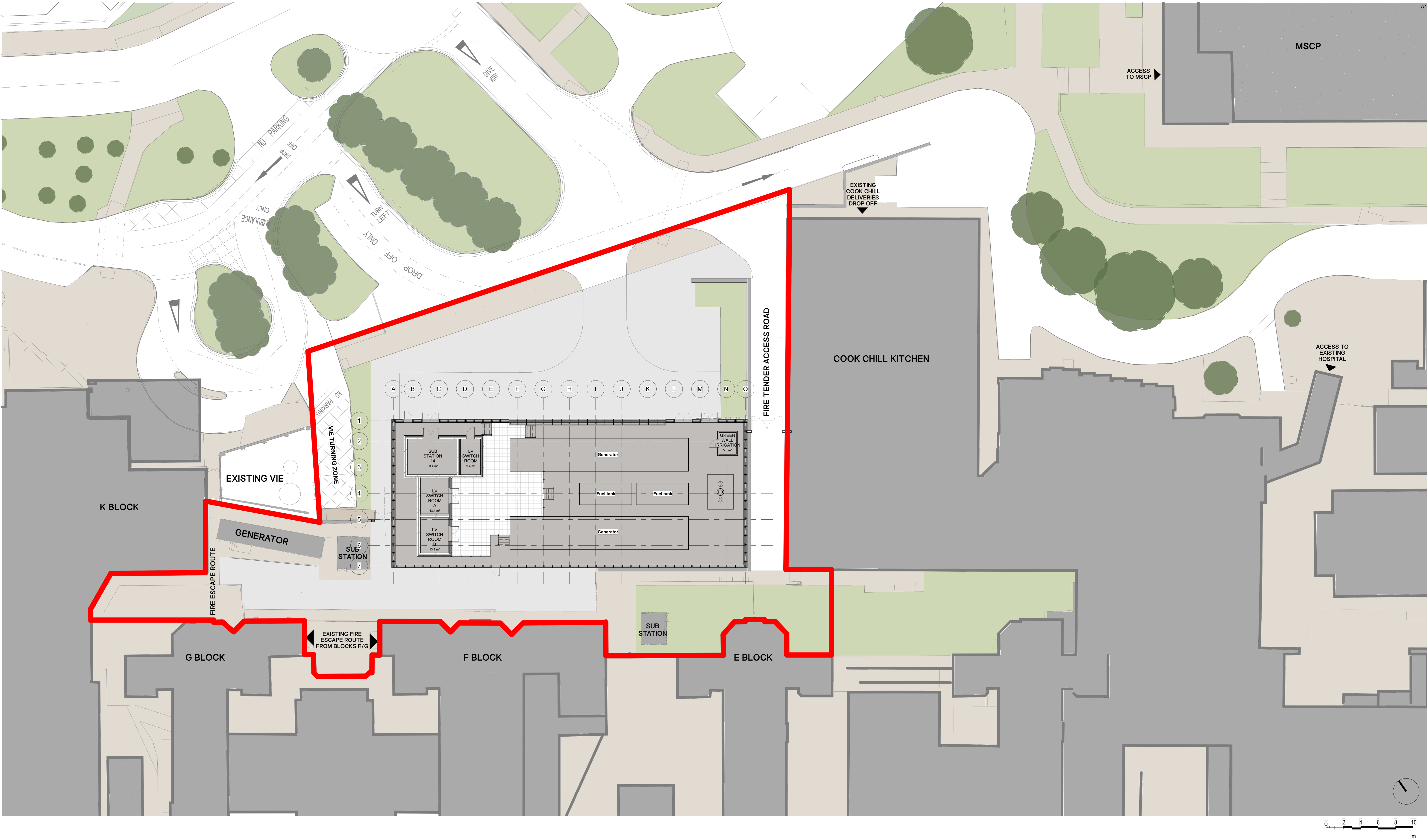
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Title  
**Habitat Impact  
WP16**

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**G10823.006**

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NOTES

**KEY**

Site boundary

| REVISIONS |          |                |
|-----------|----------|----------------|
| REV.      | DATE     | AMENDMENT      |
| P01       | 18/10/24 | Planning Issue |
| P02       | 22/11/24 | Planning Issue |

KEYPLAN

CLIENT

Manchester University NHS Foundation Trust

Manchester University NHS Foundation Trust

PROJECT

North Manchester General Hospital

SCALE@A1 1 : 200 DATE 22/11/24 ORIGINATOR LH CHECKED DB AUTHORISED AS

DESCRIPTION

Proposed Site Plan

STAGE

SR NO.  
6512

SHEPPARD ROBSON

27th Floor City Tower Piccadilly Plaza Manchester M1 4BT  
T: +44 (0)161 233 8900 E: enquiries@sheppardrobson.co.uk

STATUS PURPOSE FOR ISSUE

S2 Planning

DRAWING NO. 23135-SRA-NM172-00-DR-A-02002

REV. P02

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