

Land off Pitsford Road, Manchester

Technical Note - BNG



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Client Bellway Homes

Project Title Land off Pitsford Road

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Revision			



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Background

Rachel Hacking Ecology Ltd was commissioned in 2024 by Bellway Homes Ltd to provide technical note regarding Biodiversity Net Gain (BNG). A parcel of land off Pitsford Road, Manchester (O.S. grid reference: SD 86161 00165) is subject to a planning application with Manchester City Council for residential development. Following the submission of the planning application, Greater Manchester Ecology Unit (GMEU) provided feedback relating to BNG, the mitigation hierarchy and a mitigation strategy, requesting further information on achieving 10% BNG.

Mitigation Hierarchy

The mitigation hierarchy is a widely used tool that guides users towards limiting as far as possible the negative impacts on biodiversity from development projects.

The mitigation hierarchy steps are as follows:

- Avoid - Project proposals must give the highest priority to 'avoidance' strategies in accordance with the mitigation hierarchy.
- Minimise - Where avoidance is not feasible, it is essential to minimise negative impact by modifying the project design/strategy. All sensitive habitats must be avoided at all costs.
- Mitigate - All non-avoidable ecological damage must be compensated.
- Offset - Final resort after all options have been exhausted: the most expensive, complex, and high-risk approach.

The following measures show the results of the mitigation hierarchy through the design stage of the development.

Avoid

No avoidance measures have been achieved on site due the issues raised in the e3p Geoenvironmental Engineering Briefing Note¹, which concludes:

"Due to the nature of the Made Ground material and residual pollution, all vegetation within the development area will require removal in a controlled manner. This will then facilitate the controlled removal of hazardous substances, such as asbestos, before the placement of the capping system, which will mitigate the exposure of future site occupants. If vegetation were to remain, this would create a situation whereby contaminated materials would be present at the surface, which would result in exposure to future site occupants created by the construction of residential housing".

¹ E3p, 2024 - Geoenvironmental Engineering - Briefing Note – Ref: 17-302-N1



Minimise

No minimisation measures have been achieved on site due the issues raised in the e3p Geoenvironmental Engineering Briefing Note as above.

Mitigate

The proposed landscaping plan provides habitats such as native tree planting, amenity grassland, ornamental trees, wildflower grassland, native and hedgerow planting. This provides habitats of low-moderate ecological distinctiveness.

Woodland planting (to replace like for like (or better) the woodland to be lost) was considered as part of the design process, however this was not fully achievable due to the following:

- Inability to provide additional woodland planting within the area of land either side of the access road. In order to achieve an acceptable highway gradient (following discussion with MCC highways) there will be an embankment with a 1:3 batter slope either side of the road, which is not suitable for woodland planting due to the steepness of the slope.
- The area adjacent to Pitsford Road cannot accommodate additional woodland planting due to the requirement for an Eco-Crib retaining wall.
- The existing Network Rail access road between Pitsford Road and the railway track cannot be used for woodland planting as the road remains in active use.

Native tree whip planting has been provided across x3 Open Space areas within the site. The planting plan shows over 1,000 whips being planted in order to provide as much 'woodland' mitigation as possible within the areas that are available. Any reduction of developable area to provide additional areas of 'woodland' planting would only serve to reduce the viability of redeveloping a sustainably located site (see Viability Report) whilst still requiring the purchase of off-site units to deliver 10% net gain.

SUDS and the planting of street trees were considered, as per MCC comments, in an attempt to reduce any off-site mitigation requirements but providing SUDS and street trees would make very little difference to the amount of off-setting required and would also not satisfy the Trading Rules of the metric, due to neither of these compensating for loss of true woodland.

Offset

Due the sites conditions and constraints, the vast majority of the mitigation will be achieved by offsetting. This will be through one of three options:

- On land within legal ownership of the LPA via a Sections 106 payment, which will include fees per unit lost, and creation and maintenance costs for 30 years.
- On land in legal ownership of a third-party, registered with Natural England as a Biodiversity Net Gain offsetting site.
- The purchase of statutory credits.



Offsetting Mitigation Strategy

Discussions between Bellway Homes and Manchester City Council have identified two locations that could be used for offsetting the onsite loss via woodland planting. These locations are Ashenhurst Common, Blackley and Queens Park. These locations have areas of modified grassland, ideal for offsetting as these grassland habitats are of low distinctiveness, maximising BNG uplifts with the creation of habitat with greater ecological distinctiveness.

The site is in net loss in habitat units, with 5.35 habitat units required to provide 10% net gain (see below). The metric result has been corroborated by a further botanical survey of the woodland, undertaken in August 2024, which confirms the woodland is in poor condition. No ground flora indicative of ancient woodland was found. Moreover, no species typical of woodland ground flora were found.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-4.22
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-37.22%
	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%	11.34	12.47	5.35
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 1. Extract showing the Headline Results from the Statutory Metric Calculation Tool

However, the Trading Rules have not been satisfied within the metric, as the proposed habitats are of lower ecological value and/or less abundant than the existing woodland habitat, resulting in the actual BNG units deficit of 5.35 units (see below).

Medium Distinctiveness Summary		
Medium Distinctiveness Units available to offset Lower Distinctiveness Deficit	4.23	✓
Medium Distinctiveness Broad Habitat losses to be offset by trading up	-11.00	⚠
Higher Distinctiveness Surplus Units minus Medium Distinctiveness Broad Habitat Deficit	-11.00	⚠
Cumulative surplus of units	-6.77	⚠

Figure 2. Extract from the Trading Summary sheet of the Statutory Metric Calculation Tool

For the site to provide 6.77 units worth of woodland planting on existing modified grassland (poor condition), similar to that present at Ashenhurst Common and Queens Park, the total area required would be 2.52ha. This mitigation strategy would be the most favourable, providing mitigation within the LPA boundary.