United Environmental Services Ltd
1 Booths Park,
Chelford Road,
Knutsford,
Cheshire
WA16 8QZ

www.ues.org.uk
enquiries@ues.org.uk
01565 757788

BIODIVERSITY NET GAIN - BIODIVERSITY STATEMENT

At

Weston Hall and Pendulum Hotel
Sackville Street
Civic Quarter
City Centre
Manchester
M1 3BB

NGR: SJ 84478 97512

Prepared for:	Armaan Chowdhury c/o Cumming Group
Written by:	Ysobella Cox, UES Senior Ecologist
Approved by:	Toby Hart, UES Managing Director
	[redacted]
Date:	6th November 2025
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UES reference:	UES04940/03

CIEEM REGISTERED PRACTICE 2024-2025

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1 INTRODUCTION

1.1 Author and qualifications

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

1.2 Proposed development

The proposed development will be phased:

a) partial removal of the existing structures and erection of two buildings comprising purpose-built student accommodation, one of 50 storeys and one of 17 storeys with an 8-storey link, together with associated amenity space, external landscaping, highways works and change of use of the Pendulum hotel to purpose-built student accommodation; and

b) Removal of remaining existing structure and erection of two buildings comprising purpose-built student accommodation, one of 33 storeys and one of part-24 and part-8 storeys with a 1-storey link, together with associated amenity space, external landscaping, and highways works.

As such, Phases A and B will comprise the following:

- Phase A: 50-storeys, 17-storeys, with 8-storey link.
- Phase B: 33-storeys, part-24 and part-8 storey, with 1-storey link.

1.3 Survey objectives

This biodiversity statement has been produced for the proposed development at Weston Halls & Pendulum Hotel, Manchester. UES was commissioned in July 2025 to prepare the Biodiversity Statement as part of a Biodiversity Net Gain Assessment of the proposed development. This was completed in order to:

- Establish the baseline value of the site by calculating the number of habitat, hedgerow and watercourse units at the site of the proposed development.

- If detailed or indicative plans are available, establish the post development value of the development by calculating the number of habitat, hedgerow and watercourse units which will be created, retained and / or enhanced as part of the proposals.

- Provide guidance on habitat retention, creation and enhancement measures to inform proposed site layout and landscaping proposals and to maximize potential gains in biodiversity.

- Provide details of how offsite compensation will be used when a 10% biodiversity net gain cannot be achieved on site.

2 PLANNING POLICY

Paragraphs 180(d), 185(b) and 186(d) of the National Planning Policy Framework (NPPF) set out requirements for the delivery of BNG. In England, BNG is mandatory under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

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

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

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

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

3 METHODOLOGY

The BNG assessment has been undertaken using the DEFRA Statutory Biodiversity Metric. The metric was used to calculate baseline habitat, hedgerow and watercourse units. A UK Habitat Classification survey was undertaken as part of a Preliminary Ecological Appraisal (PEA) of the site, undertaken by UES on 15th August 2025. Surveyors present included:

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

- Bethany Dineley BSc, UES Graduate Ecologist

Habitats recorded within the proposed development site were mapped on a UK Habitat plan provided at Appendix 1. This report should be read in conjunction with the PEA produced for the proposed development site (report reference UES04940/01).

As the development will be separated into two phases, this biodiversity statement has been produced to determine the net change of each individual phase of the development as well as the complete development.

Temporary habitats created as part of Phase 1 but removed as part of Phase 2 have been included within the phase-level metrics to illustrate how habitat extent and condition will change over time as each phase is implemented. These interim metrics and their figures have not been used to calculate the Statutory Biodiversity Net Gain and do not contribute to the final assessment of the development. The Statutory Biodiversity Metric for the complete development measures only the habitats that will be present on site at the completion of the development, and therefore temporary habitats have been excluded from the overall BNG calculation.

As a result, numerical discrepancies occur between the phase-level metrics and the final whole-site metric. This is expected and does not indicate any inconsistency in the assessment. The phase-level metrics are provided for transparency and to demonstrate the temporary habitat changes during the construction phase, whereas the final whole-site metric is the only legally relevant calculation for determining compliance with the mandatory BNG requirement.

4 RESULTS

4.1 Baseline assessment

The proposed development site has an area of approximately 0.71ha and mainly comprises two connected mid-rise buildings with an associated hardstanding courtyard and pedestrian areas. Areas of frequently mown modified grassland are present at the northern, north-eastern, and western aspects of the site, with further habitats present including small areas of introduced shrub and ephemeral vegetation.

Whole development site:

The baseline value of the site has been calculated as 0.14 habitat units, 0 hedgerow units, and 0 watercourse units.

Phase 1:

The baseline value of Phase 1 has been calculated as 0.14 habitat units, 0 hedgerow units, and 0 watercourse units.

Phase 2:

The baseline value of Phase 2 has been calculated as 0.36 habitat units, 0 hedgerow units, and 0 watercourse units.

The DEFRA Statutory Biodiversity Metrics used to calculate the baseline value of the whole development site and each of the phases have been submitted with this report and provide full details of the calculations.

4.2 Post-development assessment

Detailed landscaping plans have been produced by Planit Ltd in August 2025 (Drawing number 3489-PLA-XX-XX-DR-L-2000; S3; P05), upon which the post-development value of the site has been based. As the project is a phased development, the following plans produced by Planit Ltd in August 2025 have also been utilised to calculate the phase specific post-development values:

- General Arrangement Plan (Phase 1) – 3489-PLA-XX-XX-DR-L-0002; S3; P07
- General Arrangement Plan (Phase 2) – 3489-PLA-XX-XX-DR-L-0001; S3; P07

Whole development site:

The post-development value of the site has been calculated as 1.74 habitat units, 0 hedgerow units, and 0 watercourse units.

Phase 1:

The post-development value of Phase 1 has been calculated as 0.21 habitat units, 0 hedgerow units, and 0 watercourse units.

Phase 2:

The post-development value of Phase 2 has been calculated as 1.87 habitat units, 0 hedgerow units, and 0 watercourse units.

The DEFRA Statutory Biodiversity Metrics used to calculate the preliminary post-development value of the whole development site and each of the phases have been submitted with this report and provide full details of the calculations.

5 EVALUATION AND RECOMMENDATIONS

5.1 Biodiversity net gain requirements

As a whole, the proposed development will result in a net gain of 1.61 habitat units (+1182.76%), with no net change in hedgerow and watercourse units due to the baseline value of 0 units. Each phase of the development will result in the following:

- **Phase 1 –** a net gain of 0.08 habitat units (+57.42%), with no net change in hedgerow and watercourse units due to the baseline value of 0 units

- **Phase 2 –** a net gain of 1.52 habitat units (+426.39%), with no net change in hedgerow and watercourse units due to the baseline value of 0 units

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

To adhere to the metric's trading rules, losses must be replaced by habitat, hedgerow and watercourse units of the same broad habitat type and distinctiveness, or by units from any habitat with a higher distinctiveness regardless of the broad habitat type. Based on the landscaping plans provided, the proposed development satisfies the metric's trading rules.

5.2 Recommendations

The indicative landscaping plan includes the provision of amenity areas which will contain amenity grassland, introduced shrubs, wildflower meadows and urban trees which will result in a significant net gain, above what is currently required under national and local planning policy, whilst ensuring that the trading rules have been satisfied on site.

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

A biodiversity gain plan (BGP) must be prepared to discharge this condition. The BGP must include baseline and post-development statutory metric calculations based on the finalised site layout and landscaping proposals. It must also contain full details of secured offsite compensation (where necessary) and a habitat management and monitoring plan (HMMP), detailing the proposed establishment, management and monitoring of all offsite compensation and any significant enhancements onsite.

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

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

6 CONCLUSION

The proposed development site has an area of approximately 0.71ha and mainly comprises two connected mid-rise buildings with an associated hardstanding courtyard and pedestrian areas. Areas of frequently mown modified grassland are present at the northern, north-eastern, and western aspects of the site, with further habitats present including small areas of introduced shrub and ephemeral vegetation.

The proposed development, as set out in the landscape proposals will result in a net gain of 1.61 habitat units (+1182.76%), with no net change in hedgerow and watercourse units due to the baseline value of 0 units, and will also satisfy the metric's trading rules.

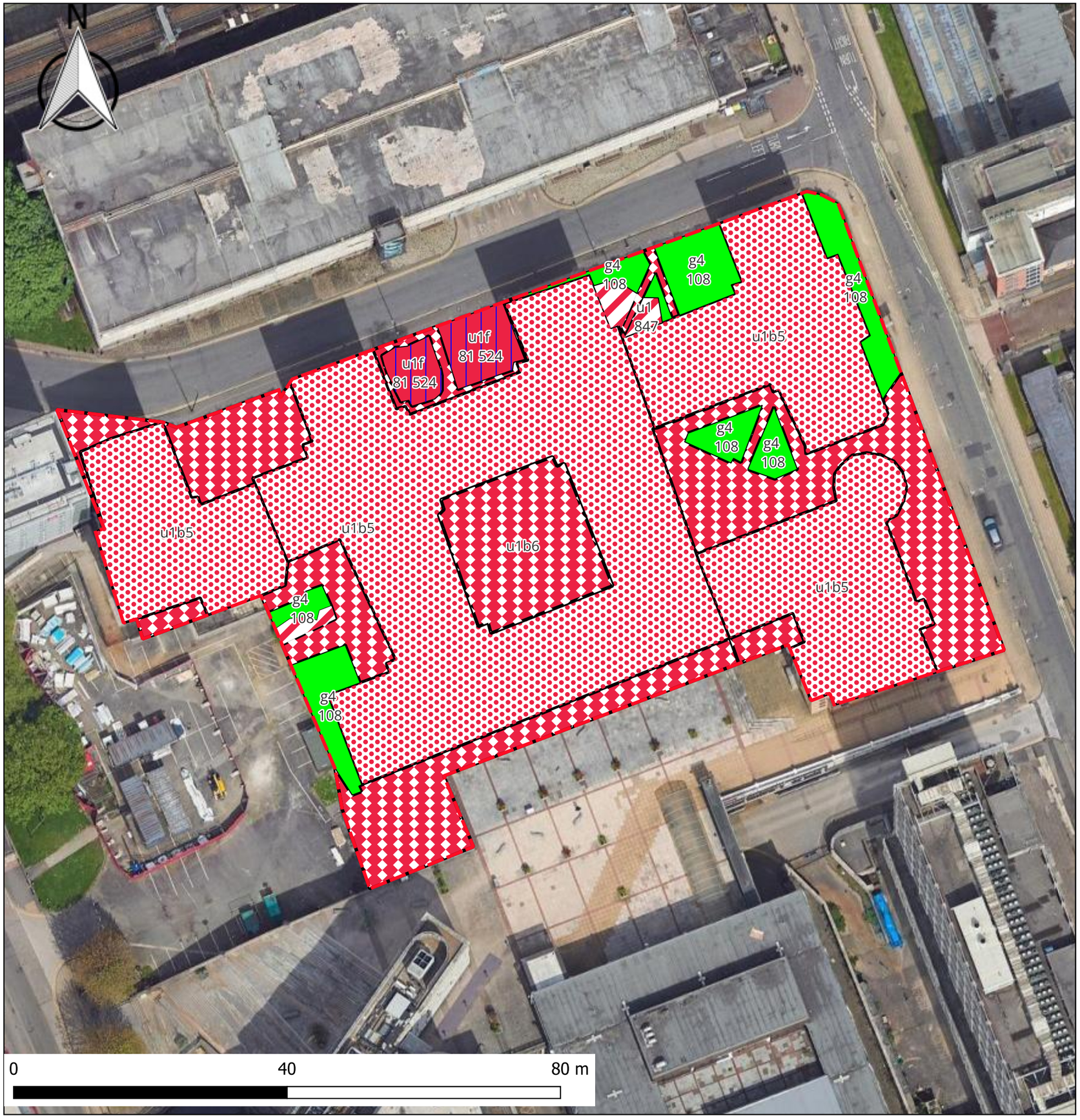
On this basis, it is considered that the proposed development is compliant with current national and local planning policy with regards to biodiversity net gain.

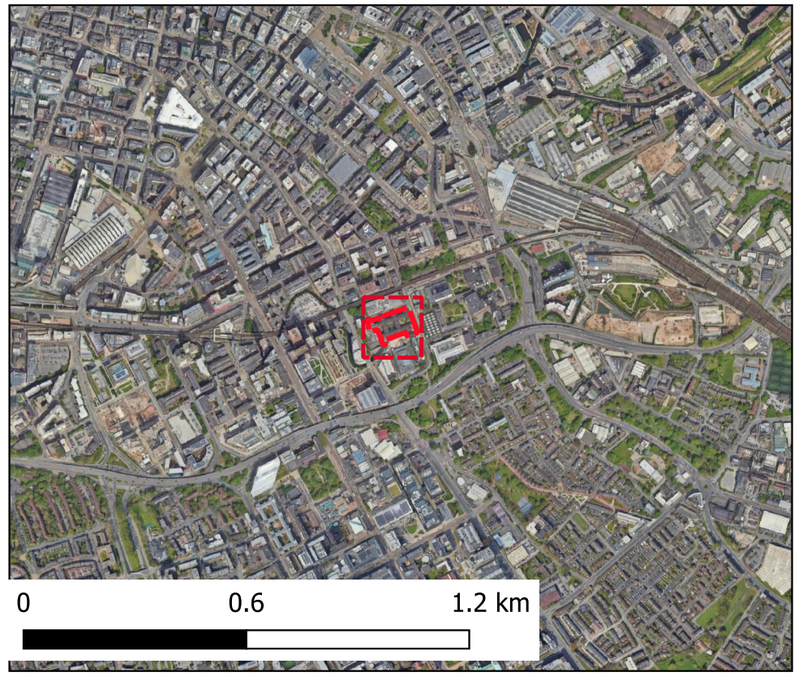
APPENDICES

Appendix 1 – UK Habitat Classification Plan

UK Habitat Classification Plan - Phase 1 Baseline

Site: Weston Halls and Pendulum Hotel, Manchester
NGR: SJ 84481 97511
Author: Ysobella Cox
Date: 11.12.2025





Key

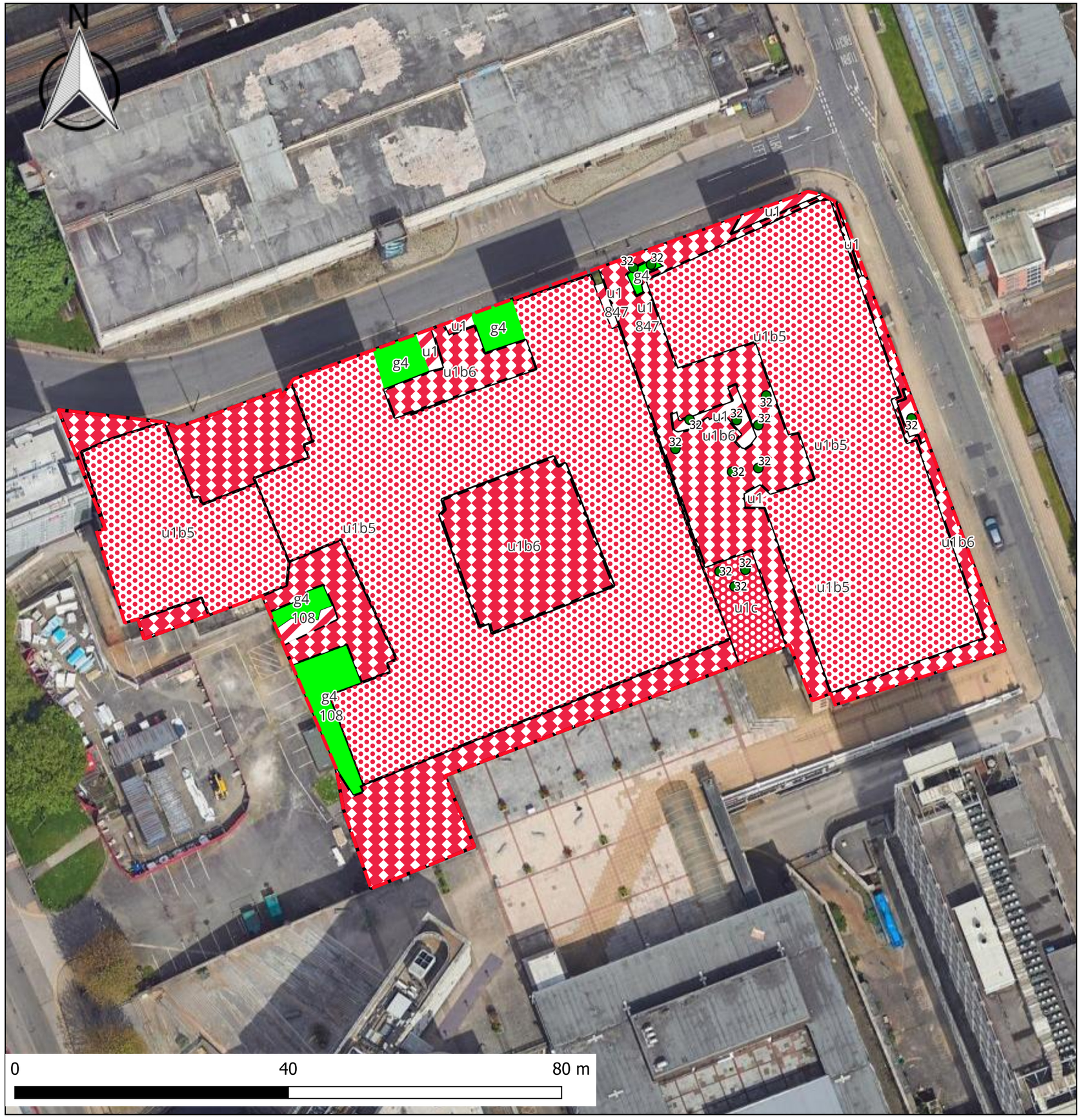
- g4 - modified grassland
- u1 - built-up areas and gardens
- u1b5 - buildings
- u1b6 - other developed land
- u1f - sparsely vegetated urban land
- Survey boundary

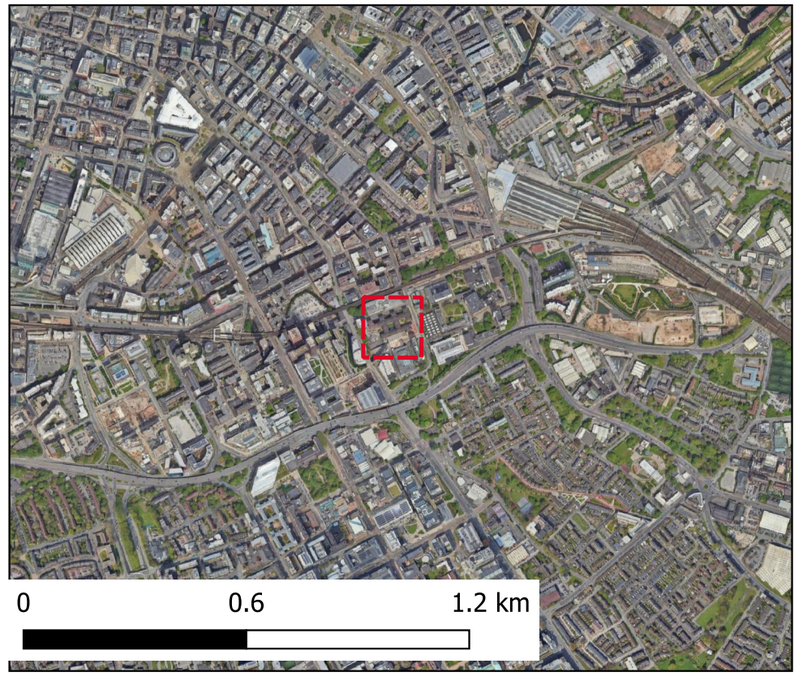
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UK Habitat Classification Plan - Phase 2 Baseline

Site: Weston Halls and Pendulum Hotel, Manchester
NGR: SJ 84481 97511
Author: Ysobella Cox
Date: 11.12.2025





Key

- g4 - modified grassland
- u1 - built-up areas and gardens
- u1b5 - buildings
- u1b6 - other developed land
- u1c - artificial unvegetated unsealed surface
- Survey boundary
- 32 - scattered trees

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Appendix 2 – Photographs



Photograph 1. Area of modified grassland in the northern section of the site.



Photograph 2. Two areas of modified grassland in the north-eastern section of the site.



Photograph 3. Area of dense vegetation and introduced shrub in the northern section of the site.



Photograph 4. Western elevation of the building.



Photograph 5. Eastern elevation of the Pendulum Hotel building.



Photograph 6. South-western elevation of the Pendulum Hotel.



Photograph 7. South-eastern elevation of the north-eastern section of the Weston Hall building. Also showing pedestrian footpaths and a courtyard area.



Photograph 8. North-eastern elevation of the south-eastern section of the Pendulum Hotel and Weston Hall buildings. Also showing pedestrian footpaths and a courtyard area.



Photograph 9. North-eastern elevation of the Weston Hall building.



Photograph 10. North-western elevation of the central north section of the Weston Hall building.



Photograph 11. Showing a combination of pitched and hipped roofs and concrete roof tiles.



Photograph 12. Concrete paved pedestrian footpaths and courtyard area with ornamental shrubs in planters.



Photograph 13. Disused hardstanding area in the western section of the site, which was formerly used as a carpark.



Photograph 14. Area of ruderal and ephemeral vegetation with sycamore saplings in the northern section of the site.



Photograph 15. Invasive non-native species Virginia creeper and buddleia in the northern section of the site.

Appendix 3 – Condition Assessments

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)		
UK Habitat Classification (UKHab) Habitat Type		
Grassland - Modified grassland		
Condition Assessment Criteria		**Criterion passed (Yes or No)**
A	There are 6-8 vascular plant species per m^2 present, including at least 2 forbs (these may include those listed in Footnote 1). **Note - this criterion is essential for achieving Moderate or Good condition.** Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m^2 (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	No
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble *Rubus fruticosus* agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Yes
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Yes
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)[2].	Yes
F	Cover of bracken *Pteridium aquilinum* is less than 20%.	Yes
G	There is an absence of invasive non-native plant species[3] (as listed on Schedule 9 of WCA[4]).	Yes

Condition Sheet: URBAN Habitat Type		
Habitat Types		
Sparsely vegetated land - Ruderal/Ephemeral		
Condition Assessment Criteria		**Criterion passed (Yes or No)**
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	No
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	No
C	Invasive non-native plant species (listed on Schedule 9 of WCA[1]) and others which are to the detriment of native wildlife (using professional judgement)[2] cover less than 5% of the total vegetated area[3]. **Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).**	Yes

Appendix 4 – Proposed Layout Plan

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5. The dimensions of all materials must be checked on site before being laid out.
6. This drawing must be read with the relevant specification clauses and detail drawings.
7. Order of construction and setting out to be agreed on site.

KEY

Boundaries

Planning boundary

CHARLES STREET

NOTE:Charles and Sackville Street layout and materials subject to further design and coordination.

LOADING

Phase B

Phase A

Plant
+33.900 m
33.600 m AOD
+33.700 m
+34.200m
Bin Store
Plant
+34.200m AOD
+34.200 m
Plant
+32.900 m AOD
Plant
+32.900 m AOD

Amenity
+35.400 m
Bin Store
Amenity

40 no. cycle storage (double stacked)

TREE HOUSE

40 no. cycle storage (double stacked)

Entrance Lobby
+35.500 m AOD
Bin Store
Management Suite
Amenity
+35.500 m AOD

+35.300 m
+35.300 m
Plant
+35.500 m
+35.500 m
Plant
+35.300 m
Plant
+35.500 m
Bin Store
+35.500 m
+35.200 m
+35.200 m

SACKVILLE STREET

LOADING

Scale Bar (m) 0 5 10 15 20

NOTE: Drawing to be read in conjunction with drawings:
3489-PLA-XX-XX-DR-L-0002 - General arrangement Plan - Phase 1
3489-PLA-XX-XX-DR-L-0003 - General arrangement Plan - Phase 2
3489-PLA-XX-XX-DR-L-1000 - Hardworks General arrangement Plan
3489-PLA-XX-XX-DR-L-2000 - Softworks General arrangement Plan

Revision	Date	Description	Drawn	Apprvd.
P07	04/12/25	Planning	HX	AS
P06	26/11/25	For approval	HX	RM
P05	06/11/25	For review and comment	AS	RM
P04	29/10/25	For review and comment	AS	RM
P03	10/10/25	For review and comment	AS	AS

PLANIT

Manchester | London | Liverpool | Leeds | Standish

Manchester
2 Back Grafton Street,
Altrincham,
Cheshire,
WA14 1DY,

W: planit-ie.com
E: info@planit-ie.com
T: 0151 363 1230

Client	IQ Student Accommodation
Project	Weston Hall & Pendulum Hotel Manchester
Drg Title	General Arrangement Plan

Created on	Created by	Approved by
21-08-25	AS	RM

Scale	Size	Workstage	Status
1:200	A1	RIBA 2	

Drg No.	Suitability	Revision
3489-PLA-XX-XX-DR-L-0001	S3	P07

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KEY

Boundaries

Planning boundary

CHARLES STREET

SACKVILLE STREET

LOADING

Existing fence and gate retained

Temporary landscape and lift

Temporary steps and ramp

2m access allowed around Weston Halls

Loose planters used to reinforce dwell and social space

Loose gravel

Controlled access

Phase B

Phase A

Entrance Lobby
+35.500 m AOD

Bin Store

Management Suite

Plant
+35.500 m

Plant
+35.300 m

Plant
+35.500 m

Bin Store
+35.500 m

+35.300 m

+35.300 m

+35.200 m

+35.200 m

40 no. cycle storage (double stacked)

40 no. cycle storage (double stacked)

LIFT

FFL. 32.746M

FFL. 32.767M

FFL. 32.794M

FFL. 32.752M

FFL. 32.768M

FFL. 32.773M

FFL. 32.771M

FFL. 32.779M

FFL. 33.638M

Scale Bar (m) 0 5 10 15 20

Revision	Date	Description	Drawn	Apprvd.
P07	04/12/25	Planning	HX	AS
P06	26/11/25	For Approval	HX	RM
P05	06/11/25	For review and comment	AS	RM
P04	29/10/25	For review and comment	AS	RM
P03	10/10/25	For review and comment	AS	AS
P02	30/09/25	For information	AS	AS

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Manchester | London | Liverpool | Leeds | Standish

Manchester
2 Back Grafton Street,
Altrincham,
Cheshire,
WA14 1DY,

W: planit-ie.com
E: info@planit-ie.com
T: 0151 363 1230

Client IQ Student Accommodation

Project Weston Hall & Pendulum Hotel Manchester

Drg Title General Arrangement Plan Phase-1

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21-08-25	AS	RM

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1:200	A1	RIBA 2	

Drg No.	Suitability	Revision
3489-PLA-XX-XX-DR-L-0002	S3	P07

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KEY

Boundaries

Planning boundary



Revision	Date	Description	Drawn	Apprvd.
P06	04/12/25	Planning	HX	AS
P05	26/11/25	For Approval	HX	RM
P04	06/11/25	For review and comment	AS	RM
P03	10/10/25	For review and comment	AS	AS
P02	30/09/25	For information	AS	AS

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Manchester | London | Liverpool | Leeds | Standish

Manchester
2 Back Grafton Street,
Altrincham,
Cheshire,
WA14 1DY,

W: planit-ie.com
E: info@planit-ie.com
T: 0151 363 1230

Client IQ Student Accommodation

Project Weston Hall & Pendulum Hotel Manchester

Drg Title General Arrangement Plan Phase-2

Created on	Created by	Approved by
21-08-25	AS	RM

Scale	Size	Workstage	Status
1:200	A1	RIBA 2	

Drg No. 3489-PLA-XX-XX-DR-L-0003

Suitability S3

Revision P06

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