

MIX Manchester

Biodiversity Net Gain

Report

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author **Agata Rogulska**

Date **09/03/2026**

approved **Jenny Ross**

signature

date **11/03/2026**

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Glossary

Term	Definition
BNG	Biodiversity Net Gain
Defra	Department for Environment, Food and Rural Affairs
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority.
UKHab	UK Habitat Classification (a standardised approach to mapping and classifying habitats).
PEA	Preliminary Ecological Appraisal.
OMPHDL	Open mosaic habitat on previously developed land
RMA	Reserved Matters Application.

1 Executive Summary

This Biodiversity Net Gain (BNG) Report presents the baseline biodiversity value, anticipated habitat losses, and post-development biodiversity outcomes for the hybrid planning application at MIX Manchester. The application comprises Full and Outline Elements, each assessed using the Statutory Biodiversity Metric in accordance with the Environment Act (2021) requirements.

Baseline ecological surveys determined that the site supports a mixture of priority and non-priority habitats, including open mosaic habitat on previously developed land (OMHPDL), other neutral grassland, mixed scrub, modified grassland, and other woodland; broadleaved and other woodland; mixed, as well as a short length of ditch within the Outline Element. No hedgerows are present within the baseline of the site. The baseline value for the whole application site is 39.42 habitat units, 0 hedgerow units, and 0.14 watercourse units.

The Proposed Development has been designed following the BNG hierarchy, retaining and enhancing habitats of higher ecological value where feasible and locating new habitat creation areas within the constraints of the Full and Outline Elements. For the Full Element, retention of mixed scrub, modified grassland, and scattered trees is complemented by the creation of native scrub, wildflower meadow, neutral grassland, rain gardens and ornamental planting. For the Outline Element, areas of woodland and the existing ditch are retained, with indicative habitat creation areas identified in line with the Illustrative Masterplan.

Despite on-site retention and creation, both the Full and Outline Elements result in net losses of medium and high-distinctiveness habitats, including OMHPDL, other neutral grassland and other woodland; broadleaved and other woodland; mixed. These shortfalls cannot be fully mitigated on-site due to spatial constraints and long term technical difficulties in creating and maintaining OMHPDL. Consequently, the purchase of off-site habitat units are required to meet the Statutory Biodiversity Metric trading rules and achieve the mandated minimum +10% net gain. Quotations have been obtained from established habitat banks to secure off-site units for OMHPDL, other neutral grassland, other woodland; broadleaved and other woodland; mixed, and watercourse, with final procurement to be confirmed through the statutory Biodiversity Gain Plan process.

With on-site delivery and off-site compensation secured, both the Full and Outline Elements can comply with the Statutory Biodiversity Metric requirements and enable the overall hybrid application to achieve a minimum +10% BNG across the application boundary.

2 Introduction

Buro Happold has been appointed by Airport City Limited Partnership to provide ecology services to inform a hybrid planning application for the Proposed Development at MIX Manchester. The application comprises full planning permission for mid-tech units and a multi-storey car park (hereafter referred to as the Full Element), and outline planning permission for a range of commercial, industrial and hotel uses (hereafter referred to as the Outline Element), with associated access, servicing, public realm and landscaping.

Biodiversity net gain (BNG) is embedded within the National Planning Policy Framework (NPPF) and in numerous local planning frameworks. Nationally, developments are required to demonstrate a quantifiable net gain in biodiversity using the Statutory Biodiversity Metric due to the Environment Act (2021).

2.1 Site Background

As illustrated in Figure 2-1, the Proposed Development is located on land to the north of the A56 spur, immediately south of Wythenshawe and to the north of Manchester Airport. The site covers approximately 12.016 ha, comprising both the Full and Outline Elements of the scheme.

The Proposed Development site (hereafter referred to as the 'site') comprises previously developed brownfield land, mature woodland and a long-stay airport car park (refer to Figure 4-1).

The wider area features a mix of residential, commercial, industrial and transportation infrastructure, primarily associated with the airport. Thorley Lane and Enterprise Way lie to the west and north-west of the site and form a significant transport corridor in the local landscape. Painswick Park lies to the north-west of the site and provides a significant area of public open space, which includes Painswick Park Meadow Site of Biological Importance (SBI) located approximately 185 m from the site. The SBI supports neutral grassland, enhanced ponds, species-rich hedgerows and patches of seminatural broadleaved woodland, forming an important area of local greenspace within the urban landscape. Although separated from the site by local roads, Painswick Park and the SBI contribute to ecological connectivity in the wider area and form part of the site's landscape context.

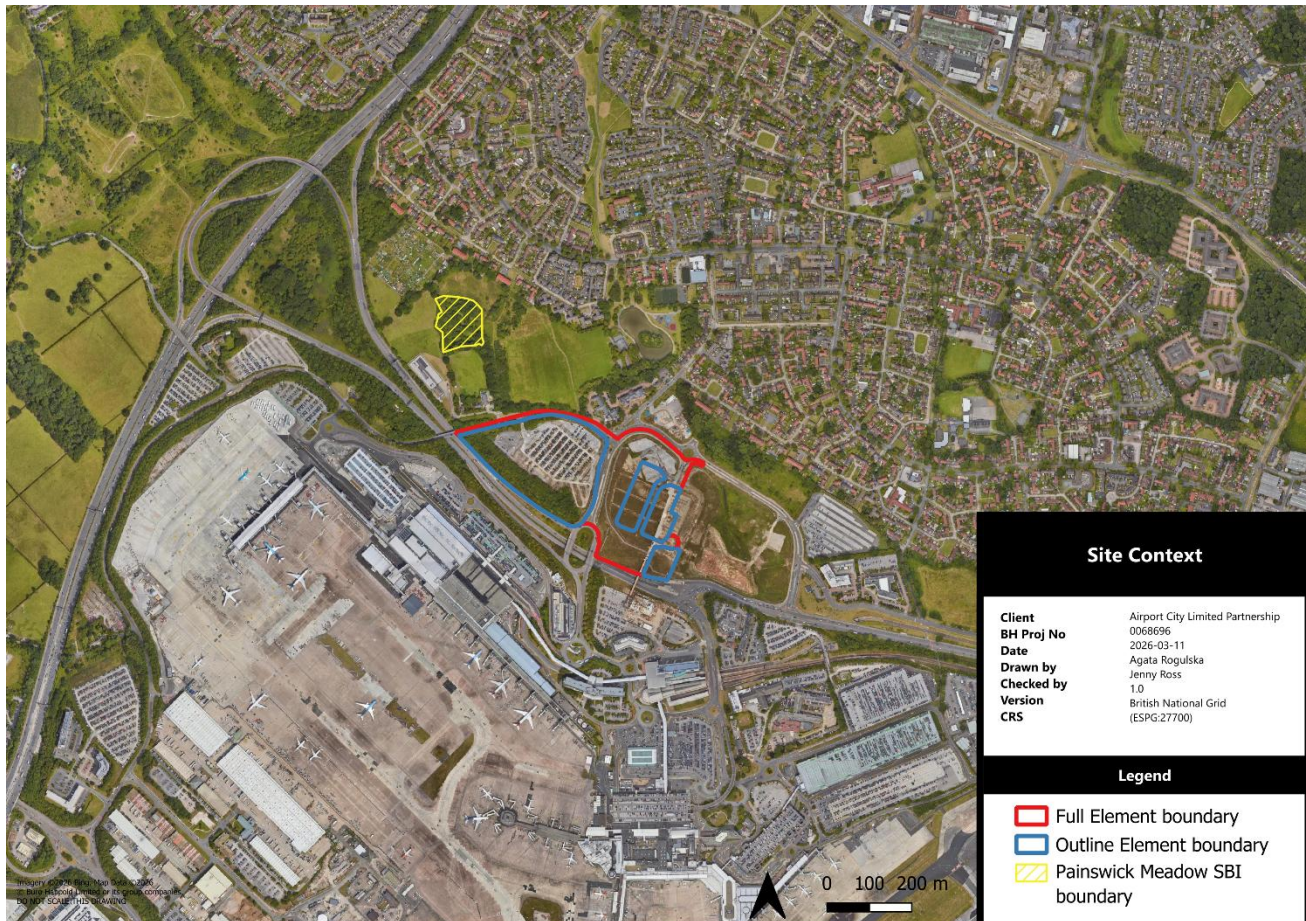


Figure 2—1 Location of the Proposed Development within the wider landscape

2.2 Site Proposal

The Proposed Development is described as: a hybrid planning application consisting of two components. The Full Element seeks full planning permission for mid-tech units (Use Class Eg(i, ii, iii)) and a multi-storey car park with ancillary commercial uses, together with associated access, servicing, public realm and landscaping. The Outline Element seeks outline planning permission for a range of commercial, industrial and hotel uses (Use Classes Eg, B2 and C1), alongside a multi-storey car park and ancillary commercial uses, with all matters reserved except for primary access.

2.3 Aims and Objectives of the Report

The Environment Act was adopted in 2021 and following formal amendments to the Town and Country Planning Act 1990, from 12 February 2024 new developments are required to deliver a mandatory 10% gain in biodiversity units post-development.

Taking into account that the project is a hybrid planning application, comprising both the Full Element and Outline Element, this report aims to:

- Present the baseline habitat, hedgerow and watercourse value for the whole site, based on up-to-date ecological habitat surveys and condition assessments covering both application components.
- Present how the Full Element, and the Outline Element where sufficient design information is available, can achieve at least the minimum 10 % net gain threshold, using current post-development habitat, hedgerow and watercourse proposals, and identify the additional BNG units to be delivered through off-site offsetting where on-site provision is insufficient, including how and where these units will be secured.
- Present the resulting change in biodiversity value, expressed in biodiversity units and percentage change, for each component of the scheme and for the site as a whole, based on the information available at this stage.

3 Methodology

The Statutory Biodiversity Metric has been used to undertake the biodiversity net gain calculations for the Proposed Development. The metric is designed to provide a quantitative approach to assessing the changes in biodiversity value brought about by development or changes in land management. It is a habitat-based approach and uses the attributes of a habitat to provide a biodiversity value based on components such as distinctiveness, condition, and strategic significance of the existing habitat as well as time to establish and difficulty of creation for proposed habitats.

The following documents/ data have been used to prepare the BNG calculations:

- Baseline assessment:
 - MIX Manchester Preliminary Ecological Appraisal (Buro Happold, 2024)
 - MIX Manchester Botanical Survey Report (Dunham Ecology, 2025)
 - MIX Manchester Tree Survey (Tyler Grange, 2026)
- Post-development assessment:
 - Detailed Landscape Plan - 3223-PLA-XX-XX-DR-L-0001 (Planit, 2026)
 - Trees General Arrangement Plan -3223-PLA-XX-XX-DR-L-2000 (Planit, 2026)
 - General Arrangement Outline Masterplan -3223-PLA-XX-XX-DR-L-0002 (Planit, 2026)
 - Phasing Strategy -3223-PLA-XX-XX-DR-L-0005 (Planit, 2026)

3.1 Pre-development habitat baseline approach

The baseline BNG calculations, as outlined in Section 4.1, provide a numerical habitat, hedgerow and watercourse value which indicates the existing value of the habitats present on the site, based on the identified habitat types and their condition scores as assessed by suitably experienced ecologists.

The habitat baseline used to support the BNG assessment has been taken from the Preliminary Ecological Appraisal (PEA) conducted by Buro Happold on 4 April 2024. As part of the PEA, the site was surveyed in accordance with the UK Habitat Classification System (Butcher et al., 2020) and, in line with the Biodiversity Metric requirements, each habitat parcel was assessed against the relevant habitat condition criteria set out within the Statutory Biodiversity Metric Technical Supplement (Natural England, 2023).

In addition, a detailed botanical survey (Dunham Ecology, 2025) was undertaken to confirm the extent and composition of open mosaic habitat on previously developed land (OMHPDL). This survey subdivided the OMHPDL area into smaller parcels and verified which sections met the priority habitat criteria, ensuring accurate mapping and condition assessment for input to the metric.

The habitats were mapped using QGIS software and aligned with topographical and arboricultural data to ensure accurate representation of the site's baseline conditions. The area of each habitat parcel was then extracted and entered into the baseline worksheets of the metric.

A summary of the habitats identified on site, their assessed condition and their distribution is provided in Section 4.1 of this report. Full details of the survey methodology and wider ecological assessment supporting the planning application are provided within Chapter 9 (Ecology and Biodiversity) of the Environmental Statement (ES) submitted alongside this planning application, which can be read alongside this report.

3.2 Post-development habitat approach

The post-development biodiversity calculations have been prepared using the Statutory Biodiversity Metric and are based on the habitats proposed within the detailed landscape plans for the Full Element and the Illustrative Masterplan for the Outline Element. These design documents define the areas of habitat retention, enhancement and creation to be delivered as part of the Proposed Development.

- **Full Element:** assessed using the detailed landscape plans, which sets out fixed habitat extents, planting typologies and species mixes. These inputs enable a detailed post-development unit calculation for this component.
- **Outline Element:** assessed using the Illustrative Masterplan. At this stage, the Outline Element shows indicative planting areas and habitat typologies. Species mixes, exact extents and achievable target conditions are not yet confirmed. The metric therefore applies a proportionate, reasonable worst-case for losses and a realistic estimate for creation and enhancement based on the parameterised green infrastructure. Final inputs will be confirmed at the Reserved Matters stage and secured through the statutory Biodiversity Gain Plan process.

The metric has been run as follows:

- **Full Element metric**
Uses only the detailed landscape plans inputs to produce a fixed, post-development unit position and to check compliance with trading rules for that element. Provides the relative baseline, just for the Full Element only, rather than the whole-site baseline.
- **Outline Element metric (indicative)**
Uses only the Illustrative Masterplan to report indicative unit outcomes that will be replaced with detailed values at the Reserved Matters stage. This ensures the Outline Element is trajectory-compliant and does not prejudice overall delivery. Provides the relative baseline for the Outline Element only.
- **Whole Site combined metric**
Combines the Full and Outline baseline values and post-development values to outline the BNG position for the Proposed Development.

Presenting the Full Element, the Outline Element and the whole-site position separately allows clear tracking of habitat changes, unit generation and delivery time frames for each element. This structure also provides transparency between

fixed, detailed inputs and indicative outline values, demonstrating how both elements contribute to the overall BNG trajectory.

3.3 Strategic Significance Approach

Sites of strategic significance are areas identified in Local Nature Recovery Strategies (LNRS) as having particular importance for delivering nature recovery, where habitat creation or enhancement is expected to provide greater ecological benefits due to local priorities or opportunities.

LNRS are statutory spatial strategies established under the Environment Act 2021. The relevant strategy for this project is the Greater Manchester LNRS, published in 2025 with associated spatial layers.

Strategic significance has been assigned in accordance with the Statutory Biodiversity Metric User Guide (Defra & Natural England 2025) checking whether habitat parcels fall within LNRS opportunity areas and whether proposed habitat types and target conditions align with LNRS priorities.

A review of the Greater Manchester LNRS mapping confirmed that the application red line does not overlap any mapped LNRS opportunity areas; therefore, all baseline and post-development habitats have been assigned low strategic significance in the statutory metric.

3.3.1 Illustrative Phasing Approach

The Proposed Development will be delivered on a phased basis. The progression of individual phases will be dependent on market interest, which will determine both the timing and order in which Reserved Matters applications for the outline plots are brought forward.

In line with the Statutory Biodiversity Metric User Guide (Defra & Natural England 2025) where habitat creation or enhancement begins after baseline habitat is cleared, the 'delay in starting habitat creation (years)' must be entered into the metric. The tool then applies this delay to the standard 'time to target condition' and automatically calculates the corresponding temporal-risk multiplier.

Metric assumptions applied

- Within the Full Element, baseline habitat will be cleared at commencement in Q4 2026 to enable construction activities and the establishment of compounds. For the first phase, landscaping will be delivered within a year of habitat loss, meaning that no delay is applied in the metric for the corresponding habitat creation. For each subsequent phase, the 'delay in starting habitat creation' represents the anticipated period during which habitat is absent before creation begins for that phase.
- For the Outline Element, baseline habitats in Parcel B will also be cleared at the Full Element commencement in Q4 2026, while the remaining Outline Element baseline habitat will be cleared at commencement in 2028. Add: There may be some variance to the delays applied to Outline Parcels A-D dependent on when Reserved Matters applications come forward on these portions of the application site.

Anticipated delays entered in the metric are outlined in Table 3-1, and the phases are presented spatially in Figure 3-1.

Table 3—1 Indicative phasing approach applied in the metric

Application Component	Phase/ Plot	Construction period	Delay applied (years)
Full Element	Mid-Tech Units A2 and A5	Q4 2026 – Q3 2027	0
	MSCP	Q4 2026 – Q4 2027	0
	Mid-Tech Unit A1	Q2 2029 – Q1 2030 (baseline habitats cleared in 2026)	4
Outline Element (to be refined at RMA)	Parcel A (Units F1 – F5)	2028 – 2035	7
	Parcel B (Units A3 and A6)	Cleared in 2026 to support construction of the Full Element 2028 – 2030	4
	Parcel C (Units B3 and E2)	2028 – 2035	7
	Parcel D (Unit B1)	2028 – 2035	7

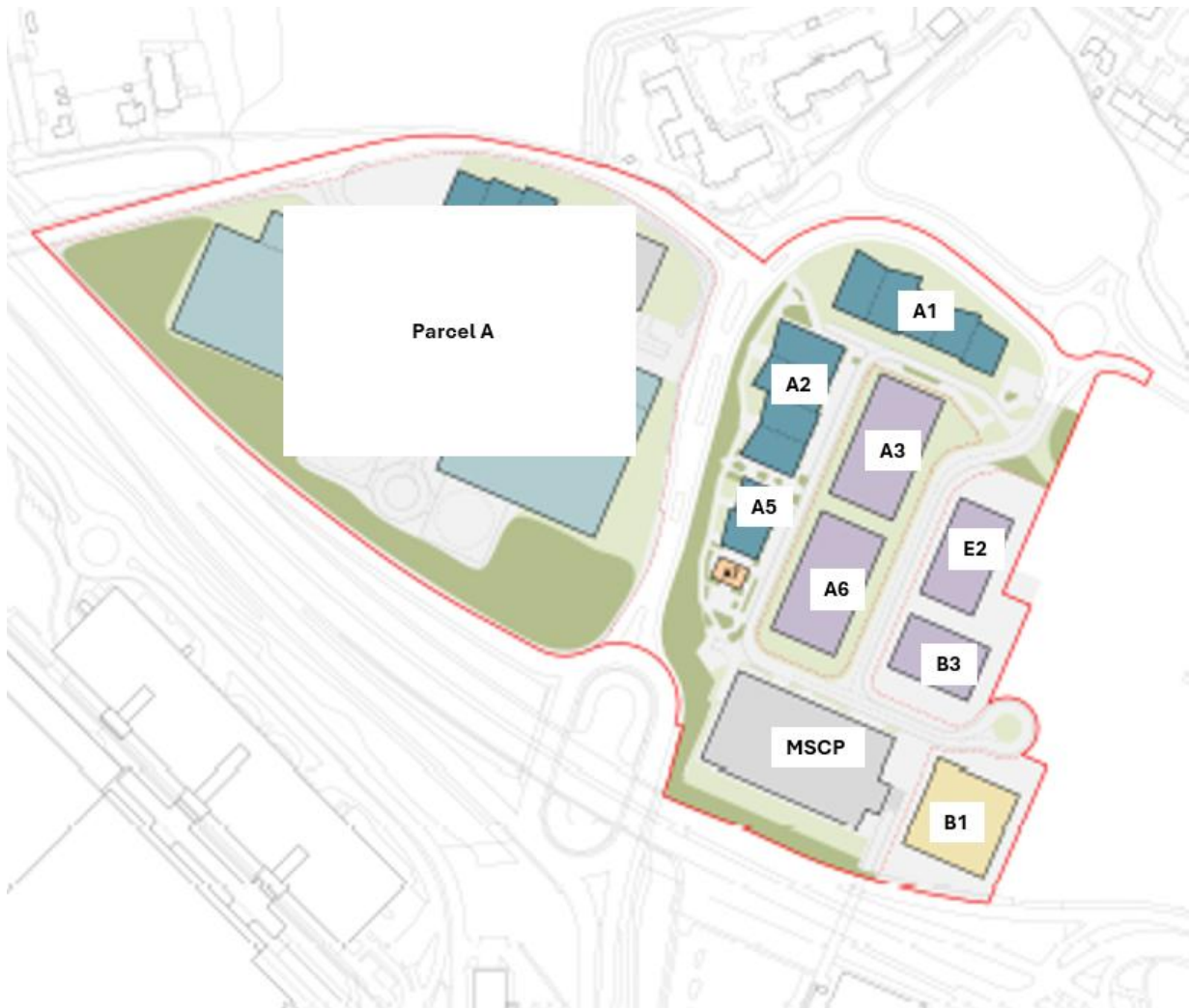


Figure 3—1 Proposed development plots

This phased delay approach accords with the User Guide’s instruction to apply advance and delay on a phased basis and to evidence entries with the phasing plan and programme. Detailed values for the Outline Element will be confirmed at the Reserved Matters stage and secured through the Biodiversity Gain Plan framework for phased schemes.

Biodiversity Gain Plan for phased development

For BNG purposes, the standard biodiversity gain condition will be modified in accordance with The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024. Instead of the standard approach, the following is expected to be submitted in accordance with the guidance (Ministry of Housing, Communities and Local Government & Department for Levelling Up, Housing and Communities, 2024. Paragraph 054 Reference ID: 74-054-20240214) as part of planning conditions relating to the consented scheme:

- an Overall Biodiversity Gain Plan (BGP) setting out a clear upfront framework for achieving 10% across the whole scheme, along with the first Phase BGP, prior to scheme commencement.
- a Phase BGP for each phase will be prepared and submitted for approval by the LPA as part of any subsequent Reserved Matters Application (RMA).

At each Phase BGP approval, the unit ledger will be updated to track units achieved, committed and remaining across the whole scheme, ensuring transparent reconciliation against the Overall BGP and maintaining compliance throughout the statutory 30-year management period.

Where a temporary shortfall arises (for example through sequencing or design evolution), contingency will be applied through later on-site phases or, if necessary and agreed with the LPA, through registered off-site units or statutory credits, to maintain a compliant 10% trajectory across the scheme.

4 Biodiversity net gain

4.1 Baseline biodiversity value

4.1.1 Habitats on site

The UK Habitat Classification survey of the site found that the site comprises priority habitats¹ open mosaic habitat on previously developed land (OMHPDL), and other woodland; broadleaved and mixed, and other non-priority habitats: mixed scrub, other neutral grassland, modified grassland, sparsely vegetated urban land (ruderal /ephemeral), urban trees, artificial unvegetated; unsealed surface and hardstanding.

Table 4-1 summarises the BNG Metric habitats identified within the Proposed Development, and used to calculate the baseline value in biodiversity units.

Table 4—1 Baseline habitat type, distinctiveness, condition and area

Habitat type	Distinctiveness	Condition	Area Ha	Application component	Habitat units
OMHPDL	High	Moderate	0.271	Full Element	3.25
OMHPDL	High	Poor	0.107	Full Element	0.64
Mixed scrub	Medium	Poor	0.099	Full Element	0.40
Other neutral grassland	Medium	Poor	1.807	Full Element	7.23
Modified grassland	Low	Poor	0.301	Full Element	0.60
Ruderal/Ephemeral	Low	Poor	0.504	Full Element	1.01
Urban trees	Medium	Poor	0.126	Full Element	0.50
Artificial unvegetated; unsealed surface	Very Low	N/A	0.043	Full Element	0.00
Developed land; sealed surface	Very Low	N/A	1.435	Full Element	0.00
Other woodland, broadleaved	Medium	Moderate	0.152	Outline Element	1.22
Other woodland; mixed	Medium	Moderate	1.762	Outline Element	14.10
OMHPDL	High	Moderate	0.199	Outline Element	2.38
OMHPDL	High	Poor	0.302	Outline Element	1.81
Other neutral grassland	Medium	Poor	1.361	Outline Element	5.48
Modified grassland	Low	Poor	0.088	Outline Element	0.18
Mixed scrub	Medium	Poor	0.050	Outline Element	0.20

¹ Priority habitats are those identified as being of principal importance for the conservation of biodiversity in England under Section 41 of the Natural Environment and Rural Communities Act 2006.

Habitat type	Distinctiveness	Condition	Area Ha	Application component	Habitat units
Ruderal/Ephemeral	Low	Poor	0.177	Outline Element	0.32
Urban trees	Medium	Poor	0.024	Outline Element	0.10
Artificial unvegetated; unsealed surface	Very Low	N/A	0.109	Outline Element	0.00
Developed land; sealed surface	Very Low	N/A	3.244	Outline Element	0.00
				Total	39.42

Using the Statutory Biodiversity Metric, the total baseline habitat value of the whole site is **39.42 habitat units**. To achieve the mandatory +10 % BNG, the post-development total must reach at least 43.36 habitat units. The Statutory Biodiversity Metric calculator is provided in Appendix 1.

In addition to achieving at least 10% net gain in the habitat module, the Statutory Biodiversity Metric applies trading rules that prevent losses of higher-distinctiveness and/or higher-condition habitats from being compensated by creating lower-distinctiveness habitats. Where the Proposed Development results in losses of higher-distinctiveness habitats (for example, OMHPDL, other woodland, and other neutral grassland), compensatory habitat creation and/or enhancement must follow the trading rules (typically like-for-like or better), which is not always feasible on site. Off-site offsetting is therefore required, as discussed in Section 4.3 Mitigation and Compensation.

4.1.2 Hedgerows on site

There are no hedgerows present within the Full Element or Outline Element and therefore the baseline value for hedgerows is **0 units**.

4.1.3 Watercourses on site

There are no watercourses present within the Full Element site. The only watercourse within the Outline Element is a 0.095 km ditch, as outlined in Table 4-2. The ditch is shown as D1 in Figure 4-1.

Table 4—2 Baseline watercourse type, distinctiveness, condition and length

Watercourse type	Distinctiveness	Condition	Watercourse encroachment	Riparian encroachment	Length km	Watercourse units
Ditch	Medium	Poor	Major	Major/Major	0.095	0.14

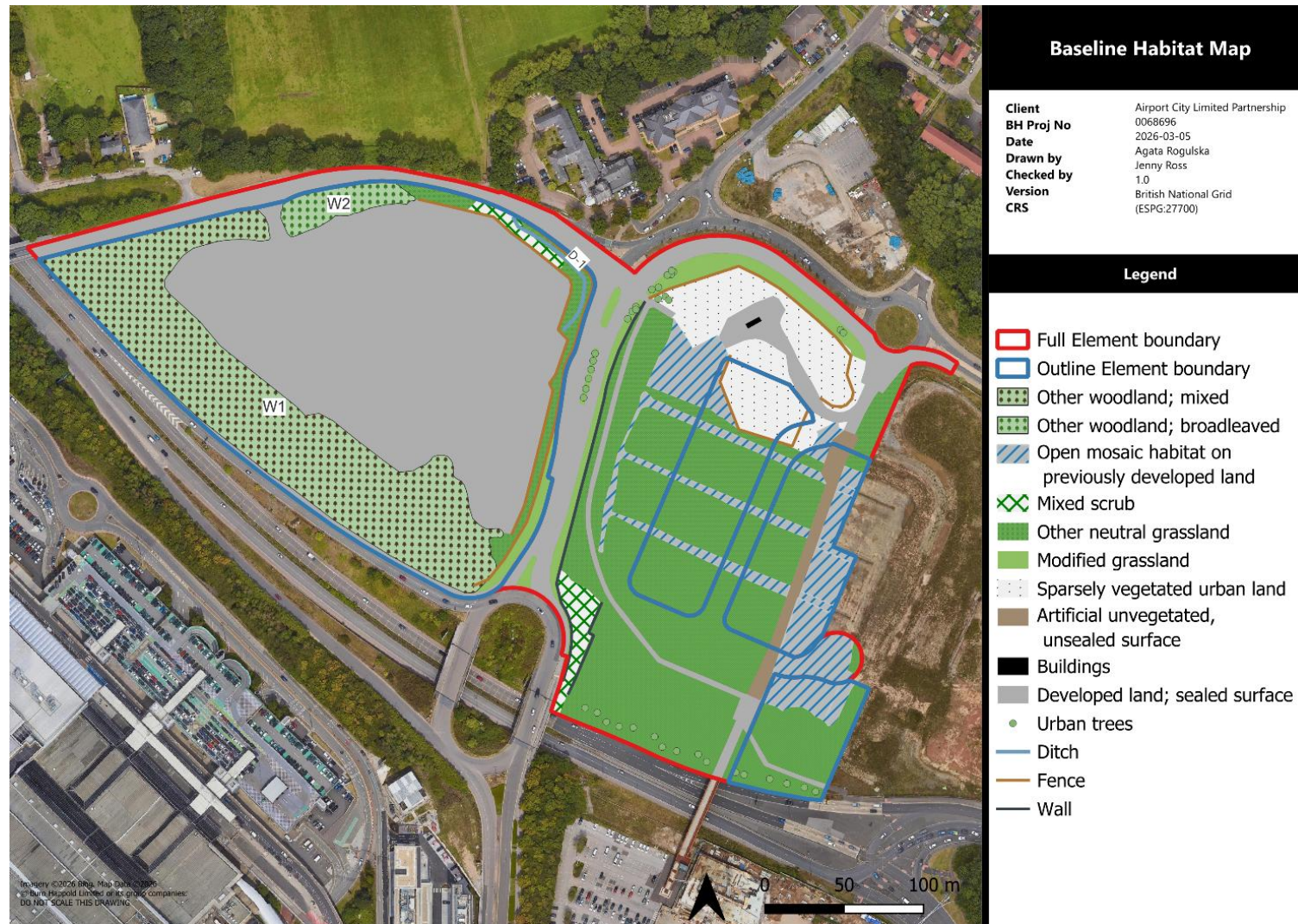


Figure 4—1 Baseline habitats within the whole Proposed Development.

4.1.4 Summary of overall baseline biodiversity value

Utilising the habitat types, condition scores and strategic significance applied to each habitat area, hedgerow and watercourse length, the baseline value of the Proposed Development site has been determined using the Statutory Biodiversity Metric. A full copy of the metric is submitted alongside this report and should be referenced for further detail on the habitat values specifically (Appendix 1). Table 4-3 summarises the baseline value for each of the three unit types for the Proposed Development. The table further identifies the uplift required for the site to achieve the minimum 10% net gain target for biodiversity net gain on site.

Table 4—3 Baseline biodiversity value of the site

Unit type	Calculated baseline value (units)	10% net gain requirement (units)
Habitats	39.42	43.36
Hedgerows	0	0
Watercourses	0.14	0.16

4.2 Post-development biodiversity value

4.2.1 Full Element (Detailed design)

4.2.1.1 Habitat Retention/ Enhancement/ Removal

The proposals for the site have been developed with reference to the BNG hierarchy which is central to the BNG process. This was applied by advising avoidance of damage to habitats, then minimising the impact and using mitigation, and finally compensating for any loss of habitat. Advice was provided throughout the project to inform the development and design to adhere to this and to achieve a minimum of +10% BNG.

In accordance with the mitigation hierarchy, the proposed development has sought to retain and protect some of the existing habitats on site, though those of the highest value will be lost due to the extent and scale of development. The retained habitats include the retention and enhancement of a section of mixed scrub, improving its condition from poor to moderate by increasing the composition and number of native species, including native woody species, and enhancing the scrub edge with forbs and grassland.

Modified grassland and urban trees will also partly be retained, as summarised in Table 4-4. The remaining habitats will be lost to facilitate development.

Table 4—4 Retained, and enhanced habitats within the Full Element landscaping

Habitat	Retained/ Enhanced/	Existing condition	Post- development condition	Area Ha retained or enhanced	% of retained or enhanced habitat	Post- development habitat units
Mixed scrub	Enhanced	Poor	Moderate	0.086	86%	0.63

Habitat	Retained/ Enhanced/	Existing condition	Post- development condition	Area Ha retained or enhanced	% of retained or enhanced habitat	Post- development habitat units
Modified grassland	Retained	Poor	Poor	0.098	32%	0.20
Urban trees	Retained	Poor	Poor	0.024	19%	0.10
Total						0.93

4.2.1.2 Proposed habitats

The proposed habitats comprise native scrub, species-rich neutral grassland and wildflower meadow, scattered urban trees, ornamental planting, and rain gardens. The habitats used in this assessment are taken from the detailed landscape plans (Planit, 2026), which sets habitat extents and planting typologies.

In recognition of the biodiversity value of the habitats lost to development, the planting strategy incorporates habitat features that support invertebrates and wider fauna. Neutral grassland and wildflower meadow areas will establish a diverse sward with seasonal flowering, with the wildflower meadow delivering a forbs dominated mix that provides a sustained nectar and pollen resource. Native scrub planting will introduce structural heterogeneity that offers cover, shelter and foraging opportunities, while rain gardens will create damp microhabitats suitable for a range of invertebrates.

The translation from landscape typologies to UK Habitat Classification equivalents applied in the metric, together with the justification for the assigned target conditions, is summarised in Table 4-5..

Table 4—5 Detailed Landscape Plan planting types to UK Habitat Classification/ Biodiversity Metric justification

Proposed landscaping	BNG habitat equivalent	Justification	Target condition criteria
Native scrub planting	Mixed scrub	Native scrub is proposed around the enhanced mixed scrub in the southwest corner of the site and continues along sections of the southern, western and northern site boundaries, as shown in Figure 4-2 It will include a range of native woody shrub species specified within the planting plan, including common hazel (<i>Corylus avellana</i>), sweet-briar (<i>Rosa rubiginosa</i>), wayfaring tree (<i>Viburnum lantana</i>) and holly (<i>Ilex aquifolium</i>), along with associated understorey species such as wall germander (<i>Teucrium chamaedrys</i>), primrose (<i>Primula vulgaris</i>) and spotted dead-nettle (<i>Lamium maculatum</i>). It has been allocated moderate condition, as it is deemed feasible that these areas can meet at least three out of the five condition criteria described within the statutory metric condition assessment sheets. This can be achieved through appropriate establishment and early-stage management, including ensuring a predominantly native species composition, preventing the establishment of invasive non-native species and maintaining a defined, structurally varied edge. Improved habitat management through a mandatory Habitat Management and Maintenance Plan (HMMP) will also ensure that moderate condition can be maintained.	Criterion 1: The parcel represents a good example of its habitat type: at least 80 percent scrub is native - Yes Criterion 2: Seedlings, saplings, young shrubs and mature shrubs are all present -No Criterion 3: There is an absence of invasive non-native plant species - Yes Criterion 4: The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat – Yes Criterion 5: There are clearings, glades or rides within the scrub, providing sheltered edges - No
Ornamental planting	Introduced shrub	Proposed planted ornamental beds are not semi-natural habitats and are therefore recorded in the BNG Metric as the urban category habitat 'introduced shrub'. As such no condition score is assigned. The ornamental planting includes sun and shade-tolerant palettes planted at nine plants per m², including species such as yarrow (<i>Achillea 'Terracotta'</i>), cranesbill (<i>Geranium 'Rozanne'</i>), black-eyed Susan (<i>Rudbeckia fulgida</i> var. <i>sullivantii</i> 'Goldsturm'), lungwort (<i>Pulmonaria officinalis</i>), Japanese forest grass (<i>Hakonechloa macra</i>), tufted hair grass	N/A

Proposed landscaping	BNG habitat equivalent	Justification	Target condition criteria
		(<i>Deschampsia cespitosa</i>) and hart's-tongue fern (<i>Asplenium scolopendrium</i>). These mixed perennial and grass plantings provide seasonal flowering and structural variety that can offer pollinator interest from early spring to late autumn via species such as cowslip (<i>Primula veris</i>), lungwort (<i>Pulmonaria 'Blue Ensign'</i>), woodland sage (<i>Salvia nemorosa 'Cardonna'</i>), and Michaelmas daisy (<i>Symphyotrichum novae-angliae 'Purple Dome'</i>).	
Rain garden swales	Rain garden	Rain gardens are proposed using a species mix planted at nine plants per m², comprising a diverse range of moisture-tolerant forbs, grasses and sedges suitable for SuDS features. The mix includes several wetland or riparian-tolerant species, such as Siberian iris (<i>Iris sibirica 'Tropic Night', 'White Swirl'</i>), purple loosestrife (<i>Lythrum salicaria</i>), hemp agrimony (<i>Eupatorium cannabinum 'Flore Pleno'</i>), tufted hair grass (<i>Deschampsia cespitosa</i>) and pukio sedge (<i>Carex secta</i>). Native species within the palette include cowslip (<i>Primula veris</i>), hemp agrimony (<i>Eupatorium cannabinum</i>), purple loosestrife (<i>Lythrum salicaria</i>) and meadow rue (<i>Thalictrum delavayi</i>). Additional ornamental but non-invasive species include New England aster (<i>Symphyotrichum novae-angliae 'Purple Dome'</i>), black-eyed Susan (<i>Rudbeckia fulgida</i> var. <i>sullivantii 'Goldsturm'</i>), yarrow and bistorta (<i>Bistorta affinis 'Superba'</i>). The combination of native and non-native moisture-tolerant species provides seasonal nectar and pollen, structural variation and ecological function appropriate for SuDS. The habitat has been allocated moderate condition, as it is feasible that it can meet all relevant condition criteria, including varied vegetation structure, absence of invasive species, presence of wildlife-beneficial flowering species, native-beneficial composition and suitability for wetland/riparian settings.	Criterion 1: Vegetation structure is varied and no single structural component exceeds 80 percent of the habitat area – Yes Criterion 2: The habitat contains a range of plant species beneficial to wildlife, including flowering species that provide nectar resources across multiple seasons – Yes Criterion 3: Invasive non-native species are absent – Yes Criterion 4: Plant species composition is appropriate to a wetland or riparian SuDS setting – Yes Criterion 5: The habitat demonstrates features consistent with SuDS function, including moisture-tolerant vegetation and surface water interaction – Yes
Neutral grassland	Other neutral grassland	Areas shown as neutral grassland in Figure 4-2 will be established using <i>EM2 Standard General Purpose Meadow Mixture</i> by Emorsgate Seeds or similar. This seed mix is appropriate to	Criterion 1: The parcel represents a good example of its habitat type,

Proposed landscaping	BNG habitat equivalent	Justification	Target condition criteria
		deliver a diverse meadow sward comprising a range of meadow grasses and forbs, supporting seasonal flowering and structural heterogeneity suitable for invertebrates that meets the other neutral grassland category. This newly created habitat will provide on-site mitigation for the loss of areas of other neutral grassland within the Full Element. The habitat is allocated moderate condition, as it is feasible to meet the required criteria for this habitat through appropriate establishment and management. Management will be secured through the site HMMP to achieve and maintain moderate condition.	with a consistently high proportion of characteristic indicator species – Yes Criterion 2: Sward height is varied, with at least 20 percent of the sward less than 7 cm and at least 20 percent more than 7 cm – Yes Criterion 3: Cover of bare ground is between 1 percent and 5 percent – Yes Criterion 4: Cover of bracken is less than 20 percent and cover of scrub (including bramble) is less than 5 percent – Yes Criterion 5: Combined cover of suboptimal species and physical damage is less than 5 percent, and invasive non-native plant species are absent – Yes Criterion 6: There are 10 or more vascular plant species per m² present, characteristic of the habitat type – No
Wildflower meadow	Other neutral grassland	This habitat has been categorised as other neutral grassland. It will be established using the <i>Woodland Fringe PT03</i> wildflower mix by Pictorial Meadows or similar, which is dominated by native wildflower species and is intended to form a forbs-rich but relatively low-grass sward at the edges of the native scrub planting. The wildflower composition provides seasonal colour and ecological value but, due to the low initial grass content, does not meet the criteria for higher grassland conditions and is therefore allocated poor condition. With establishment and appropriate management, these areas will provide an informal transition between scrub and grassland habitats while contributing nectar and pollen resources within the site. This newly	Criterion 1: The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species – No Criterion 2: Sward height is varied, with at least 20 percent of the sward less than 7 cm and at least 20 percent more than 7 cm – No (due to low grass content and early establishment) Criterion 3: Cover of bare ground is between 1 percent and 5 percent – Yes Criterion 4: Cover of bracken is less than 20 percent and cover of scrub

Proposed landscaping	BNG habitat equivalent	Justification	Target condition criteria
		created habitat will provide on-site mitigation for the loss of areas of other neutral grassland within the Full Element.	(including bramble) is less than 5 percent – Yes Criterion 5: Combined cover of species indicative of suboptimal condition and physical damage is less than 5 percent, and invasive non-native species are absent – Yes Criterion 6: There are ten or more vascular plant species per m² present, characteristic of the habitat type – No (the forbs-rich but low-grass composition does not satisfy species-count structure for higher conditions)
Urban trees	Urban trees	A total of 146 scattered urban trees will be created within the Full Element through the planting of smaller specimen nursery stock across the development area, using a palette of primarily native species including field maple (<i>Acer campestre</i>), common alder (<i>Alnus glutinosa</i>), wych elm (<i>Ulmus glabra</i>), silver birch (<i>Betula pendula</i>), downy birch (<i>Betula pubescens</i>), Scots pine (<i>Pinus sylvestris</i>) and white willow (<i>Salix alba</i>), together with a limited number of non-native species such as <i>Liquidambar styraciflua</i> and <i>Gleditsia triacanthos</i>. The habitat has been allocated moderate condition, as newly planted trees can feasibly meet at least three of the six condition criteria: the species mix is predominantly native, individual trees automatically satisfy the canopy-gap criterion, there is no evidence of adverse impacts on tree health, and tree canopies over sail vegetation beneath. Criteria relating to maturity, the presence of ecological niches (such as deadwood or cavities) cannot yet be met due to the young age. Establishment and long-term care will be secured through the site HMMP to support healthy canopy development over time.	Criterion 1: The tree is a native species (or at least 70 % within the block are native species) – Yes Criterion 2: The tree canopy is predominantly continuous, with gaps in canopy cover making up <10 percent of total area and no individual gap >5 m wide (individual trees automatically pass this criterion) – Yes Criterion 3: The tree is mature (or more than 50 percent within the block are mature) – No Criterion 4: There is little or no evidence of adverse impact on tree health by human activities and there is no current regular pruning regime, so trees retain >75 % of expected canopy for their age and height – Yes Criterion 5: Natural ecological niches for vertebrates and invertebrates are present (e.g. deadwood, cavities, ivy or loose bark) – No

Proposed landscaping	BNG habitat equivalent	Justification	Target condition criteria
			Criterion 6: More than 20 % of the tree canopy area is oversailing vegetation beneath – Yes/ No
			N/A

It is calculated that the created habitats within the Full Element will deliver a further **5.57 habitat units**. These are in addition to the units retained and enhanced. Table 4-6 provides a summary of the post-development habitats, including, area, distinctiveness, condition, strategic significance, temporal risk, creation difficulty and the resulting units

Figure 4-2 provides spatial representation of the proposed habitats on site.

Table 4—6 Post-development habitat creation value

Habitat type	Area (ha)	Distinctiveness	Condition	Strategic significance	Final time to target multiplier	Difficulty of creation & restoration	Post-development units
Mixed scrub	0.22	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.837	Low	1.47
Mixed scrub	0.07	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.726	Low	0.42
Introduced shrub	0.079	Low	N/A	Area/compensation not in local strategy/ no local strategy	0.965	Low	0.15
Introduced shrub	0.018	Low	N/A	Area/compensation not in local strategy/ no local strategy	0.837	Low	0.03
Rain garden	0.082	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.899	Low	0.30
Rain garden	0.044	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.779	Low	0.14
Other neutral grassland	0.168	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.837	Low	1.12
Other neutral grassland	0.081	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.931	Low	0.30
Other neutral grassland	0.013	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.808	Low	0.04
Urban trees	0.476	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.700	Low	1.33
Urban trees	0.110	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.607	Low	0.27
Developed land; sealed surface	3.604	V.Low	N/A	Area/compensation not in local strategy/ no local strategy	1.000	Low	0.00
Total:							5.57

4.2.1.3 Proposed hedgerows

The proposed post-development hedgerow creation includes planting **0.469 km** of native hedgerow. This will generate **1.49 hedgerow units**.

To target moderate condition for newly created native hedgerows, the proposed planting has been designed to meet the relevant attributes within the Statutory Metric condition sheet. The species palette comprises predominantly native woody species, enabling compliance with height and width criteria once established. Planting at appropriate densities will allow the hedge to develop a continuous woody canopy with limited vertical and horizontal gaps, supporting attainment of the gap-related criteria. The landscape design also incorporates a margin of undisturbed ground along at least one side of each hedgerow, allowing perennial herbaceous vegetation to establish and meet the undisturbed-ground functional group requirements. Management within the HMMP will ensure the created hedgerows achieve and maintain moderate condition.

A summary of the proposed post-development hedgerows, including length, distinctiveness, condition, strategic significance, temporal risk, creation difficulty and the resulting units, is presented in Table 4—7.

Table 4—7 Post-development hedgerow creation value

Habitat type	Length (km)	Distinctiveness	Condition	Strategic significance	Final time to target multiplier	Difficulty of creation & restoration	Post-development units
Native hedgerow	0.286	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.837	Low	0.96
Native hedgerow	0.183	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.726	Low	0.53
Total:							1.49

4.2.1.4 Proposed watercourses

There are no watercourses proposed within the Full Element site.

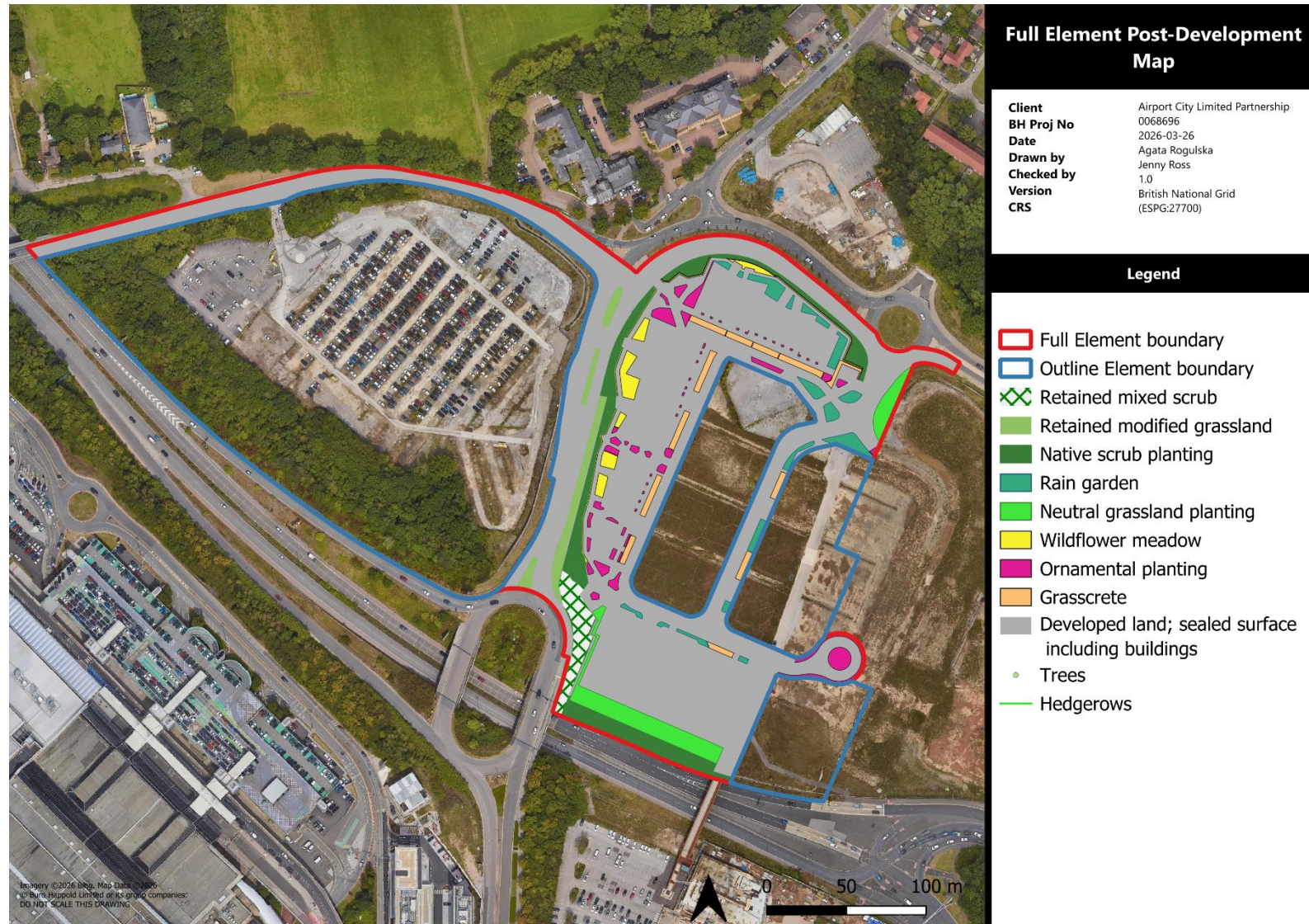


Figure 4—2 Full Element post-development habitat map

4.2.2 Full Element post-development biodiversity value

For the Full Element, partial retention and enhancement of mixed scrub, together with the partial retention of modified grassland and urban trees, and the creation of new landscaping, will result in a total of 6.50 biodiversity units on site. This equates to a -52.40% total net loss for habitats. A percentage net change is not reported for hedgerows because the baseline hedgerow units are 0. The unit deficit reflects losses of other neutral grassland and OMHPDL.

The design has incorporated areas of other neutral grassland to partially mitigate losses of this habitat type; however, full on-site compensation is not feasible due to site constraints. Additionally, on-site compensation for the loss of OMHPDL is not practicable as reliable recreation of this priority habitat is technically difficult given its heterogeneous structure and character and there wouldn't be area available to redeliver the habitat type within the proposed development layout.

Although the arithmetic shortfall to reach the minimum +10% would be 8.51 units, application of the Statutory Biodiversity Metric trading rules for high and medium-distinctiveness habitats (OMHPDL and other neutral grassland) increases the true unit deficit to 9.65 units as these habitat losses cannot be traded for the habitat types delivered on site to mitigate the losses. Of this total, 3.89 units are required to compensate for the losses of OMHPDL, and 5.76 units for the remaining areas of other neutral grassland once the created areas have been taken in to account (refer to the biodiversity Metric calculator in Appendix 1). This shortfall will be addressed through the purchase of off-site biodiversity units from a recognised habitat bank to achieve the mandatory +10% requirement, as set out in Section 4.3 Mitigation and Compensation.

Table 4—8 and Table 4-9 provide summary of post-development biodiversity value and change in habitat, hedgerow and watercourse units for the Full Element.

Table 4—8 Change in area habitat units

Area habitat units baseline	Area habitat units post-dev	Unit deficit (to achieve +10% BNG)	Net gain (%)
13.63	6.49	8.51 (without trading rules)	-52.40 %
		9.65 (with trading rules)	

Table 4—9 Change in hedgerow units

Hedgerow units baseline	Hedgerow units post-dev	Unit deficit (to achieve +10% BNG)	Net gain (%)
0.00	1.49	0.00	N/A

4.2.3 Outline Element (Indicative only)

4.2.3.1 Habitat Retention/ Enhancement/ Removal

The proposals for the site have been developed with reference to the BNG hierarchy which is central to the BNG process. This was applied by advising avoidance of damage to habitats, then minimising the impact and using mitigation, and finally compensating for any loss of habitat. Advice was provided throughout the project to inform the development and design to adhere to this and to achieve a minimum of +10% BNG.

The Proposed Development has sought to retain and protect as much of the habitats of higher ecological value as possible across the site. This includes partial retention of the other woodland; broadleaved and mixed. Based on the outline masterplan, it is anticipated that about 58% of other woodland; mixed and 72% of other woodland; broadleaved will be retained.

The existing ditch is expected to be retained in its current alignment within the Outline Element. Opportunities for ecological enhancement are limited by the ditch's engineered drainage function, proximity to development plots and fixed space available for bank reprofiling or hydrological modification. On this basis, uplift to a higher condition may not be practicable within the outline parameters, and the feature is currently assumed to remain in poor condition. Any residual shortfall in watercourse units would be addressed through off-site unit procurement at Biodiversity Gain Plan stage, subject to discussion with the LPA.

Table 4—10 summarise the potential habitat retention within the Outline Element.

Habitat type	Retained/ Enhanced/	Existing condition	Post- development condition	Ha/ km retained or enhanced	Post-development units
Other woodland; broadleaved	Retained	Moderate	Moderate	0.097 ha	0.78
Other woodland; mixed	Retained	Moderate	Moderate	0.956 ha	7.65
				Total habitat	8.43
Ditch	Retained	Poor	Poor	0.095 km	0.14
				Total watercourse	0.14

4.2.3.2 Proposed habitats

The habitats included within this assessment are adapted from the Illustrative Masterplan (Planit, 2026), which identifies indicative proposals for habitat creation around the building parameters that form the proposals for development at this stage. As the Outline Element will be refined at Reserved Matters application stage, the habitats included within this section are illustrative and subject to change. The intention of this section is to provide an indication of what could be achieved on site to support habitat provision and to provide an early indication of what unit deficits will need to be considered in future Phased Biodiversity Gain Plans.

Specific species mixes and detailed planting specifications are not yet available for the Outline Element. Accordingly, target habitat types and conditions have been assumed for the purposes of the Statutory Biodiversity Metric, applying a proportionate, reasonable worst-case approach based on indicative planting areas. However, the proposed landscaping for the Outline Element is expected to comprise the same habitat types used in the Full Element, and the same translation from landscape typologies to UK Habitat Classification has therefore been applied, consistent with Table 4-6.

These assumptions will be updated at Reserved Matters and secured through the Biodiversity Gain Plan process.

Table 4—11 provides a summary of the post-development habitats, including area, distinctiveness, condition, strategic significance, temporal risk, difficulty and the resulting potential habitat units that could be achieved on site given the current layout and proposed habitats within the Outline Element.

Table 4—11 Potential post-development habitat creation value

Habitat type	Area (ha)	Distinctiveness	Condition	Strategic significance	Final time to target multiplier	Difficulty of creation & restoration	Post-development units
Mixed scrub	0.665	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.652	Low	3.47
Rain garden	0.06	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.779	Low	0.19
Rain garden	0.12	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.700	Low	0.34
Introduced shrub	0.065	Low	N/A	Area/compensation not in local strategy/ no local strategy	0.837	Low	0.11
Introduced shrub	0.216	Low	N/A	Area/compensation not in local strategy/ no local strategy	0.752	Low	0.32
Other neutral grassland	0.212	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.726	Low	0.62
Modified grassland	0.069	Low	Poor	Area/compensation not in local strategy/ no local strategy	0.752	Low	0.10
Urban trees	0.244	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.320	Low	0.62
Urban trees	0.326	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.546	Low	0.71
Developed land;	4.979	V.Low	N/A	Area/compensation not in local	0.779	Low	0.00

Habitat type	Area (ha)	Distinctiveness	Condition	Strategic significance	Final time to target multiplier	Difficulty of creation & restoration	Post-development units
sealed surface				strategy/ no local strategy			
Total							5.86

4.2.3.3 Proposed hedgerows

The indicative post-development hedgerow creation could provide up to 0.342 km of native hedgerow. This could generate 0.89 hedgerow units. A summary of the potential post-development hedgerows, including length, distinctiveness, condition, strategic significance, temporal risk, creation difficulty and the resulting potential units, is presented in Table 4—12 Post-development hedgerow creation value.

Table 4—12 Post-development hedgerow creation value

Habitat type	Length (km)	Distinctiveness	Condition	Strategic significance	Final time to target multiplier	Difficulty of creation & restoration	Post-development units
Native hedgerow	0.342	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.652	Low	0.89

4.2.3.4 Proposed watercourses

There are no new watercourses proposed within the Outline Element site.

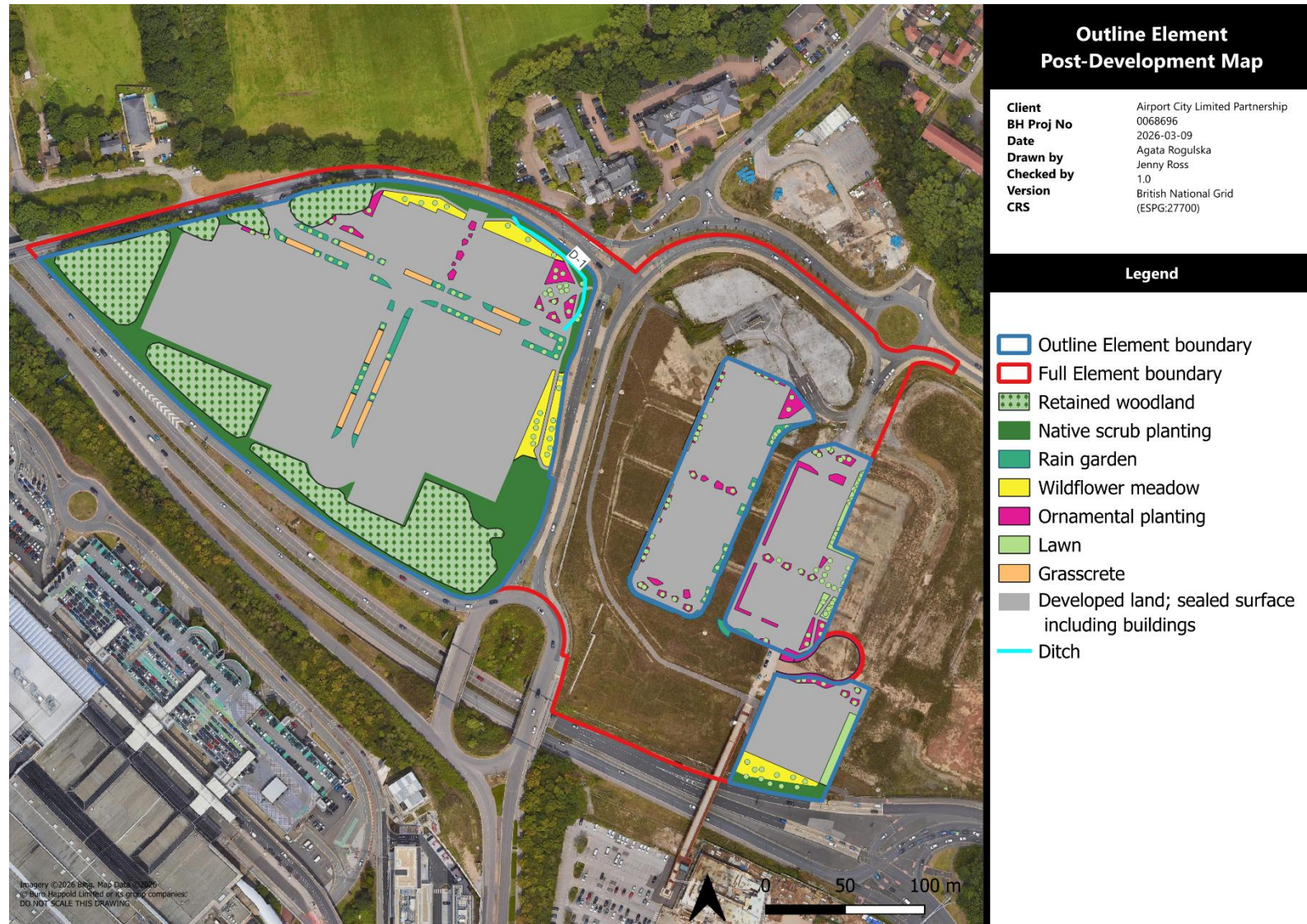


Figure 4—3 Outline Element indicative post-development habitat map

4.2.4 Outline Element post-development biodiversity value

For the Outline Element, retention of approximately 58% of other woodland; mixed and 72% of other woodland; broadleaved, retention of the existing ditch results in 8.43 habitat units and 0.14 watercourse units. Indicative on-site creation of new habitats and hedgerows together could generate further 5.86 habitat units and 0.89 hedgerow units, subject to refinement through detailed design. This equates to a -44.61% total net change for habitats and 0% for watercourses; a percentage net change is not reported for hedgerows because the baseline hedgerow units are 0.

The habitat unit deficit for the Outline Element is driven by losses of woodland, other neutral grassland and OMHPDL. Based on the outline-stage calculations, the application of the Statutory Biodiversity Metric trading rules for these high and medium distinctiveness habitats results in an indicative trading-rule deficit of 15.91 units, comprising 4.19 units for OMHPDL, 6.89 units for woodland and 4.83 units for other neutral grassland. As these habitat types are unlikely to be replaced on site within the parameters of the Outline Element, it is expected that this trading-rule deficit would need to be addressed through the purchase of off-site biodiversity units. Once this requirement is met, the remaining uplift needed to reach the minimum 10% net gain could then be delivered through on-site habitat creation, with the Illustrative Masterplan indicating that approximately 5.86 habitat units could potentially be achieved, subject to refinement through detailed design at the Reserved Matters stage.

In addition, 0.01 watercourse units will be procured off-site to address the residual shortfall in the watercourse module, as enhancement of the existing engineered ditch to a higher condition on site is not practicable.

The Outline Element figures reported above are indicative at this stage and are subject to change as detailed design progresses. Final habitat types, extents, target conditions and phasing for the Outline Element will be confirmed at Reserved Matters and secured prior to commencement through the statutory Biodiversity Gain Plan and associated legal agreement, including the procurement and allocation of any off-site biodiversity units.

Table 4—13, 4-14 and 4-15 provide summary of post-development biodiversity value and change in habitat, hedgerow and watercourse units for the Full Element.

Table 4—13 Change in area habitat units

Area habitat units baseline	Possible retained area habitat units	Potential creation habitat units	Unit deficit (to achieve + 10% BNG)	Net gain (%)
25.78	8.43	5.86	14.08 (without trading)	-44.61%
			15.91 (with trading rules)	

Table 4—14 Change in hedgerow units

Hedgerow units baseline	Hedgerow units post-dev	Unit deficit (to achieve +10% BNG)	Net gain (%)
0.00	0.89	0.00	N/A

Table 4—15 Change in watercourse units

Watercourse units baseline	Watercourse units post-dev	Unit deficit (to achieve +10% BNG)	Net gain (%)
0.14	0.14	0.01	0.00 %

4.3 Mitigation and Compensation

Full Element

For the Full Element, on-site measures will partially compensate habitat losses and will be supplemented by purchased off-site units to achieve compliance with the Statutory Biodiversity Metric trading rules and the mandatory +10 % outcome.

Approximately 0.26 ha of other neutral grassland will be created using a low-nutrient substrate and a species-rich, locally appropriate neutral-grassland seed mix. Establishment and aftercare will target moderate condition through appropriate cutting, removal of arisings, and invasive-species control, secured via the HMMP. This on-site provision will part-mitigate the loss of other neutral grassland but, due to site constraints, cannot fully compensate the overall deficit.

To address the residual shortfall for other neutral grassland, 5.76 units are expected to be secured will from the Lostock Lagoons Habitat Bank within Cheshire West and Chester Council delivered by the Green Earth Development Group. Availability of suitable units has been confirmed with the provider, and these units will be purchased ahead of commencement in accordance with Biodiversity Gain Plan requirements. The units will be secured through legal agreement, recorded on the Biodiversity Gain Site Register, and their allocation to this development will be evidenced within the Biodiversity Gain Plan prior to works starting on site.

Compensation for OMHPDL will be entirely through purchased off-site units, because reliable on-site recreation of this priority habitat is technically difficult. The habitat's long-term ecological value depends on heterogeneous substrates, early-successional structure and periodic disturbance, which are not readily reproduced within a managed development landscape. A total of 3.89 units is expected to be secured from the Lostock Lagoons Habitat Bank via the Green Earth Development Group. These units will also be purchased ahead of commencement and recorded on the Biodiversity Gain Site Register, with allocation to this development confirmed through the Biodiversity Gain Plan process.

Recognising that the exact pre-development assemblage associated with OMHPDL cannot be replicated, pollinator-supporting planting will provide season-long nectar and pollen resources, and bug hotels and small refuge features will be installed within green infrastructure. These measures will be secured by condition and implemented before occupation of the relevant plots.

With the on-site creation of other neutral grassland and the purchase of off-site units for other neutral grassland and OMHPDL, the Full Element will satisfy the Statutory Biodiversity Metric trading rules and achieve the mandatory +10 % BNG for this component of the scheme.

Outline Element

For the Outline Element, off-site compensation is required to comply with the Statutory Biodiversity Metric trading rules for high- and medium-distinctiveness habitats and to achieve the mandatory +10% outcome for this component of the scheme.

On-site delivery cannot fully address the calculated losses. OMHPDL is technically difficult to recreate on site and will be spatially limited within the development proposals. Replacement of woodland and other neutral grassland at the required scale and target conditions is constrained by competing land-use requirements and the proposed developable areas identified within the parameter plans. For watercourses, enhancement of the existing engineered ditch to a higher condition on site is not practicable within the outline parameters, leaving a small residual shortfall to achieving a net gain.

Based on the outline-stage metric, after accounting for the indicative post-development on-site creation, the following indicative unit purchases would be required to address the residual shortfall: 4.19 units (OMHPDL), 6.89 units (woodland), 4.83 units (other neutral grassland) and 0.01 units (watercourse).

To prioritise local delivery where feasible, Manchester City Council has been contacted to explore opportunities to support local habitat enhancements and to identify local habitat banks. Initial discussions indicate that habitat banking proposals may come forward at Painswick Park, and the development would seek to support these if they become available within the required timescales.

In parallel, quotations have been obtained from Green Earth Development Group, including habitat banks: Cledford Lagoons (Cheshire East Council area; OMHPDL, woodland and grassland units), Lostock Lagoons (Cheshire West and Chester Council area; OMHPDL, woodland and grassland units) and Keele Meadows (Newcastle-under-Lyme Borough Council area; woodland and grassland units). Final provider selection will consider habitat type and distinctiveness, deliverability and long-term management, spatial risk and cost.

All figures above are indicative at this stage and will be confirmed at Reserved Matters as detailed design progresses. Unit procurement, allocation and 30-year management will then be secured prior to commencement through the Biodiversity Gain Plan and a legal agreement, with off-site units recorded on the Biodiversity Gain Site Register.

With on-site retention and indicative potential habitat creation, together with the purchase of off-site units for OMHPDL, woodland, other neutral grassland and watercourse, the Outline Element will satisfy the Statutory Biodiversity Metric trading rules and enable delivery of the mandatory +10% Biodiversity Net Gain for this component of the scheme.

Accordingly, with the on-site measures and the procurement of the specified off-site biodiversity units for both the Full and Outline Elements, the Proposed Development will deliver a combined outcome that satisfies the Statutory Biodiversity Metric trading rules and achieves the mandatory +10% BNG across the overall application boundary.

4.4 Summary of post-development biodiversity value for the Proposed Development

This section summarises the post-development biodiversity position for the Proposed Development as a whole. Biodiversity unit values and percentage changes have been calculated using the Statutory Biodiversity Metric and reflect the combined effects of on-site habitat retention, enhancement and creation across the Full and Outline Elements, together with off-site compensation described in Section 4.3.

Across the application boundary, the Statutory Biodiversity Metric identifies a potential on-site net change of - 47.31% for area habitats. Losses of higher distinctiveness habitats that cannot be replaced on site generate an anticipated trading-rule deficit requiring 25.57 area habitat units to be secured off-site. Once this trading-rule requirement is met, the habitats proposed within the Full Element, along with the potential habitat creation that could be delivered within the Outline Element at Reserved Matters stage, provide sufficient uplift to address the remaining deficit and enable the overall scheme to exceed the +10% net gain threshold.

For hedgerows, the site has a baseline value of 0.00 units. Newly planted hedgerows across both elements can generate 2.38 units, representing a net increase from baseline. Because the baseline is zero, percentage change cannot be calculated and no off-site hedgerow units are required.

Watercourse unit value remains unchanged on site. To achieve the +10% requirement for watercourses at the whole-site level, 0.01 units will likely have to be secured through off-site provision.

The results are presented in Table 4—16, Table 4—17 and Table 4—18.

Table 4—16 Summary of post-development area habitat value

Application component	On-site area habitat units baseline	On-site retained/enhanced area habitat units	Potential created area habitat units	On-site net gain (%)	Unit deficit (to achieve +10% BNG)	Units to be purchased off-site (dictated by trading rules)	Final net gain(%) post-compensation
Full Element	13.63	0.92	5.57	-52.40 %	8.51	9.65	Over +10%
Outline Element	25.78	8.42	5.86	-44.61 %	14.08	15.91	Over +10%
Whole site combined	39.42	9.35	11.42	-47.31 %	22.59	25.57	Over +10%

Table 4—17 Summary of post-development hedgerow value

Application component	On-site hedgerow units baseline	On-site hedgerow units post-dev	On-site net gain (%)	Unit deficit (to achieve +10% BNG)	Units to be purchased off-site (dictated by trading rules)	Final net gain(%) post-compensation
Full Element	0.00	1.49	N/A	0.00	N/A	N/A

Application component	On-site hedgerow units baseline	On-site hedgerow units post-dev	On-site net gain (%)	Unit deficit (to achieve +10% BNG)	Units to be purchased off-site (dictated by trading rules)	Final net gain(%) post-compensation
Outline Element	0.00	0.89	N/A	0.00	N/A	N/A
Whole site combined	0.00	2.38	N/A	0.00	N/A	N/A

Table 4—18 Summary of post-development watercourse value

Application component	On-site watercourse units baseline	On-site watercourse units post-dev	On-site net gain (%)	Unit deficit (to achieve +10% BNG)	Units to be purchased off-site (dictated by trading rules)	Final net gain(%) post-compensation
Full Element	0.00	0.00	0.00%	0.00	N/A	N/A
Outline Element	0.14	0.14	0.00%	0.01	0.01	+10%
Whole site combined	0.14	0.14	0.00%	0.01	0.01	+10%

5 Conclusion

The BNG assessment demonstrates that the Proposed Development has been designed to follow the mitigation hierarchy, retaining and enhancing habitats of higher ecological value wherever feasible and incorporating meaningful areas of habitat creation across both the Full and Outline Elements. Baseline surveys confirm the presence of priority habitats, including OMHPDL and woodland, as well as other neutral and modified grasslands, scrub and urban habitats. Although significant areas of habitat will be lost to development, the proposed landscaping delivers a coherent suite of new habitats that will contribute to biodiversity within the site in the long term.

For both elements of the scheme, on-site habitat creation alone cannot fully compensate losses of high- and medium-distinctiveness habitats due to site constraints and the technical difficulty of recreating certain habitat types, notably OMHPDL. Application of the Statutory Biodiversity Metric trading rules therefore results in residual deficits that require off-site compensation. Suitable off-site providers have been identified, and the necessary units will be secured through the Biodiversity Gain Plan and associated legal agreements, ensuring compliance with statutory requirements.

As detailed design for the Outline Element progresses, habitat extents, target conditions and phasing will be refined, with final figures confirmed at the Reserved Matters stage. Biodiversity unit procurement, allocation and long-term governance will then be secured prior to commencement. The phased Biodiversity Gain Plan framework will provide transparency throughout delivery, ensuring that the overall +10% BNG requirement is maintained across the entire scheme.

With the combination of on-site retention, enhancement and creation, supported by appropriate off-site compensation, the Proposed Development is capable of achieving the mandatory +10% Biodiversity Net Gain and fully accords with the Statutory Biodiversity Metric trading rules.

6 References

Buro Happold (2024). MIX Manchester Preliminary Ecological Appraisal.

Buro Happold (2026). Ecology ES Chapter.

Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2023). UK Habitat Classification – Habitat Definitions. Version 2.01. Available at: <https://ukhab.org/>.

Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2023). The UK Habitat Classification User Manual. Version 2.01. Available at: <https://ukhab.org/>.

CIEEM (2018). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

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

DEFRA (2024). The Statutory Biodiversity Metric User Guide.

Dunham Ecology (2025). MIX Manchester Botanical Survey Report.

Natural England (2024). The Statutory Metric.

Natural England (2024). The Statutory Metric – Technical Annex 1: Condition Assessment Sheet and Methodology.

Planit (2026). Detailed Landscape Plan. 3223-PLA-XX-XX-DR-L-0001.

Planit (2026). General Arrangement Outline Masterplan. 3223-PLA-XX-XX-DR-L-0002.

Planit (2026). Phasing Strategy. 3223-PLA-XX-XX-DR-L-0005.

Tyler Grange (2026). MIX Manchester Tree Survey.

Appendix A Statutory Biodiversity Metric

Please see separate Excel calculator for the full Biodiversity Metric calculations. The calculator is to be reviewed alongside this report.

Appendix B Planning Policy and Legislation

B.1 National legislation and planning policy

B.1.1 The Environment Act (2021)

In 2021 the Environment Act gained Royal Assent, providing a new legislative framework for developments to consider in respect of potential environmental impacts and opportunities. Within the Environment Act, as of the 12th February 2024, it is a mandatory requirement for all developments to deliver a 10% net gain for biodiversity using a measured approved metric approach.

B.1.2 National Planning Policy Framework (NPPF; 2024)

The revised National Planning Policy Framework (NPPF), published in July 2018 and updated in February 2019, July 2021, September 2023 and December 2024, sets out the Government's planning policies for England and how these should be applied. The revised NPPF continues to stress the importance of the local authority contribution to improving and protecting the environment through development of a systematic approach to enhancing biodiversity, minimising waste and pollution, and mitigation/adaptation to climate change impacts.

Chapter 15 of the NPPF requires that local planning authorities, when considering planning applications, should aim to conserve and enhance biodiversity by applying the following principles:

- 'Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity, (in a manner commensurate with their statutory status or identified quality) and minimising impacts and providing net gains for biodiversity by establishing coherent ecological networks that are more resilient to current and future pressures';
- 'To protect and enhance biodiversity and geodiversity, plans should identify and map components of local wildlife-rich habitats and wider ecological networks including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them... and promote the conservation, restoration, and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity';
- 'If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused';
- 'Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists'; and
- 'Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity

B.2 Local policy and guidance

B.2.1 Manchester Local Plan (Core Strategy 2012; Addendum 2024)

The Manchester Local Plan provides the statutory framework for assessing planning applications in the city, including policies on green infrastructure, ecological networks and nature conservation. It must now be read alongside Places for Everyone following the 2024 Addendum.

B.2.2 Places for Everyone Joint Development Plan (adopted 2024; plan period 2022 to 2039)

Places for Everyone is part of the statutory development plan for Manchester. It sets strategic policies to protect environmental assets, prioritise brownfield land and deliver a connected green infrastructure network. The GMCA guidance reproduces the plan's approach to BNG, stating that:

- "Achieving a major net enhancement of biodiversity value and improving access to nature are key priorities for this Plan and central components of the wider approach to green infrastructure and the natural environment."
- "If our overall aims of a major net enhancement of biodiversity value and improved access to nature are to be achieved then all new development will have to play its part, each delivering a net gain in biodiversity. This could involve the protection and improvement of existing habitats, the creation of new ones, and/or the strengthening of connections between them. Recognised metrics will be applied to new development proposals to calculate and demonstrate a measurable net gain in biodiversity of no less than 10%."
- Policy JP-G 9 (as quoted in the GMCA guidance) expects development to "follow the mitigation hierarchy" and to "achieve a measurable net gain in biodiversity of no less than 10%," with "appropriate provision for long-term management of habitats and geological features connected to the development."

B.2.3 Greater Manchester Local Nature Recovery Strategy (LNRS) and BNG Strategic Significance Guidance (2025)

The LNRS is the statutory strategy for nature recovery across Greater Manchester and defines how strategic significance must be assigned in the Statutory Biodiversity Metric: "From 15th February 2025, the Greater Manchester Local Nature Recovery Strategy should be the only local document used to assign strategic significance for habitat parcels in Greater Manchester." The guidance confirms that parcels should be assessed for strategic significance at both baseline and post-intervention.

B.2.4 Greater Manchester BNG Guidance for Planners and Applicants (2024)

GMCA's guidance sets a consistent process for BNG submissions, validation and review across the city-region. It explains that "a net gain will be required in all three biodiversity unit 'types', Habitat, Hedgerow and River units, where they are present within the baseline of the site," and that applications must demonstrate measurable outcomes using the Statutory

Biodiversity Metric. It also highlights that BNG is “additional to all current legislative requirements associated with habitats and species,” and that the mitigation hierarchy still applies.

B.2.5 Manchester Biodiversity Strategy and Action Plan (2022 to 2030)

The city’s Biodiversity Strategy establishes objectives and actions to conserve, protect and enhance biodiversity and to drive local nature recovery, complementing the development plan and supporting the integration of BNG measures in new development.

Agata Rogulska
Buro Happold
[Click here to enter text.](#)
Email: agata.rogulska@burohappold.com