

BIODIVERSITY NET GAIN STRATEGY NOTE

1.1 INTRODUCTION

This Biodiversity Net Gain Strategy note has been prepared by Greengage on behalf of Muse Places ('Muse') in relation to the regeneration of Wythenshawe Town Centre. Its purpose is to provide an overarching strategy framework against to inform the delivery of biodiversity net gain ('BNG') across the Wythenshawe Masterplan Area.

BACKGROUND TO THE WYTHENSHAW MASTERPLAN

Following an extensive procurement process Manchester City Council ('MCC') selected Muse as its delivery and investment partner in August 2024 to deliver transformational investment in Wythenshawe Town Centre.

In May 2024 Muse prepared a Masterplan Report for Wythenshawe Town Centre which covered the Civic and wider environs. The Masterplan builds upon the key visions of the Wythenshawe Civic Centre Development Framework (approved 2023) and sets out plans to deliver around 2,000 new homes across a mix of tenures and housing types to meet the needs of a diverse community.

The first tranche of residential sites to come forward include Alpha House (plot 2.1), The Birtles (Plot C.2) and Brotherton House (Plot 3.3) as shown below in the figure below:



Planning applications for the first three residential sites will be submitted simultaneously to MCC in November 2025 and be covered by a combined Environmental Statement. Subsequently, full planning applications will then be submitted on a plot by plot basis over the next 10+ years.

This strategy note is designed to cover the entire masterplan area to ensure that a comprehensive approach is taken. It is intended to be a 'live' document which will be updated from time to time to respond to changing context and policy updates, as required.

1.2 LEGISLATIVE AND PLANNING POLICY CONTEXT

Environment Act 2021

Under the Environment Act, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of off-site compensation, or the purchase of statutory credits. The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the LPA. Under the Act, the net gains must be maintained for at least 30 years.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024 sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

Statutory Development Plan

The relevant adopted Development Plan documents for the masterplan area comprises the following policy documents:

- Places for Everyone Joint Development Plan (adopted March 2024) (PfE);
- Manchester Core Strategy (adopted July 2012) (addendum added March 2024 following PfE adoption);
- 'Saved' Policies of the City of Manchester Unitary Development Policies (adopted July 1995) ('Saved' UDP)

Core Strategy

Policy EN15 of the Core Strategy seeks to ensure that developers identify and implement reasonable opportunities to enhance, restore and create new biodiversity, either on-site or adjacent to the site.

Places for Everyone

Policy JP-G8 seeks to secure a net enhancement of biodiversity resources. Development is expected to:

"Follow the mitigation hierarchy of:

- i. Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts, then*
- ii. Adequately mitigating any harm to biodiversity, then*
- iii. Adequately compensating for any remaining harm to biodiversity"*

Emerging Planning Policy

In September 2025 MCC published its regulation 18 consultation on the Draft Local Plan. Whilst the Plan can be afforded limited weight at this stage in line with national guidance it does set out a 'direction of travel' in respect of policy aspirations. Draft policy EN5 'Biodiversity Net Gain' is of specific relevance and states that:

All development subject to the national mandatory requirement for Biodiversity Net Gain shall deliver at least a 10% net gain in biodiversity value, to be secured for a minimum of 30 years through an appropriate means e.g. a legal agreement.

In identifying and implementing Biodiversity Net Gain, developers will be expected to enhance, restore or create new biodiversity that contributes to linkages between valuable or potentially valuable habitat areas where appropriate, with reference to:

- *The priorities and actions set out in the Greater Manchester Local Nature Recovery Strategy;*
- *The Manchester Biodiversity Strategy, which provides further details of priority habitats within Manchester, and opportunities for biodiversity enhancement including corridors such as the Mersey, Medlock and Irk River Valleys, the canals and disused railway lines, and areas of managed greenspace particularly in parks; and*
- *The Habitats Regulations Assessment (HRA) for Manchester, which gives detailed consideration to Special Areas of Conservation (SACs), including the Rochdale Canal SAC just outside the district boundary*

It goes on to state that any off-site BNG should be provided in the following order of priority, with full justification given:

- *Off site, but as near to the development site as possible, within the boundary of Manchester District and within the Greater Manchester Local Nature Recovery Strategy Network area*
- *Off site, within the National Character Area 55: Manchester Conurbation, and within the Greater Manchester Local Nature Recovery Network area*
- *Off site and within the Greater Manchester Local Nature Recovery Network area*
- *Off site and within Manchester. Off site and within Greater Manchester*

- *Off site, beyond Greater Manchester or via the purchase of Statutory Credits as a last resort.*

Consideration will also be given to the provision of off-site Biodiversity Net Gain that is located within Manchester but not within the Greater Manchester Local Nature Recovery Network, where the specific ecological benefits and wider social benefits to the local community can be clearly demonstrated.

In the event of no possible Biodiversity Net Gain within Manchester, either on-site or off-site, the location for any off-site biodiversity units beyond Manchester's boundary, should have some benefit to Manchester residents e.g. schemes that would reduce flooding downstream or improve water quality.

Biodiversity Gain Hierarchy

The Biodiversity Gain Hierarchy (BGH) is a distinct mitigation hierarchy set out in paragraph 186 (a) of the NPPF, which sets out priority actions for providing 10% BNG as part of a planning application. The BGH states in the first instance adverse effects will be avoided onsite and if they can't be those effects should be mitigated be that onsite, offsite by registering gains and finally via the purchase of biodiversity credits.

Any off-site Biodiversity Net Gain for the Masterplan shall be provided in the following order of priority, with full justification given and following the BGH:

- Off site, but as near to the development site as possible within the City of Manchester District;
- Off site, within the National Character Area 55: Manchester Conurbation;
- Off site, within the Greater Manchester Local Nature Recovery Network area;
- Off site, beyond Greater Manchester; and,
- Offsite via purchase of Statutory Credits as a last resort.

1.3 PRE-APPLICATION DISCUSSIONS

MCC Planning Officers

Pre-application discussions have been held with MCC Planning Officers regarding the proposed planning applications over the past 3 months. In terms of BNG, Planning Officers have highlighted the need to explore all avenues to deliver BNG on plot or failing that within the local area, where possible. All proposals which diverge from this approach should be fully justified.

GMEU

A discussion was had with Greater Manchester Ecology Unit (GMEU) on the 10th October 2025 to discuss the current position of the Masterplan and the three initial plots. The discussion included the details highlighted within this strategy note, including the current position of the three plots, and our intended approach to providing a 10% BNG on each plot and the intentions for the Masterplan. It was acknowledged that the approach was acceptable to the approach set out by the Environment Act 2021.

It was also highlighted that there was a lack of responsible bodies within the Greater Manchester Region and as such has led to a lack of habitat banks for offsetting. Therefore, where offsetting is required, this will have to be done outside of the City of Manchester, unless a habitat bank can be set up within the City of Manchester, which may not be in time for the determination of the planning applications for Brotherton House and Alpha House. A habitat bank generally takes between 1-2 years to set up but can take longer dependant on the size of the land, baseline survey timings, management plan creation and legal agreements.

1.4 OVERVIEW OF BNG POSITION

Greengage Environmental were commissioned by Muse Developments to provide Biodiversity Net Gain (BNG) Services for the development at Wythenshawe Town Centre (WTC). It is understood that the WTC is to be redeveloped as several individual plots providing both residential and commercial units. To date Plot 3.3 (otherwise known as Brotherton House), C.2 and 2.1 (otherwise known as Alpha House) are being brought forward to planning separately. Currently to date the Biodiversity Gain Hierarchy has been used to inform the design, i.e. avoid, mitigate, compensate. BNG positions of each plot are as follows:

- Brotherton House – Baseline values are 7.10 HU and 0.28 HeU. Post development values are 6.53 HU and 0.55 HeU. This is a net loss of 0.57 HU and net gain of 0.27 HeU (equivalent to -8.01 % for HU and +97.56 % for HeU).
- C.2 The Birtles – exempt from BNG under the 'de minimus' exemption.
- Alpha House – Baseline values are 1.03 HU and 0.01 HeU. Post development values are 0.44 HU and 0.32 HeU. This is a net loss of 0.59 HU and net gain of 0.31 HeU (equivalent to -57.50 % for HU and +3065.20 % for HeU).

Masterplan

The Masterplan was assessed using a desk-based assessment which identified plots that would have more constraints than others when being brought forward for development. This took into account both protected species constraints and the likelihood for providing BNG on site or not. It used a RAG rating: red= likely deficit Amber=likely achieves 10% Green= likely exceeds 10% and can be seen in Figure 0.1. It should be noted that the assessment was undertaken in April 2025, and the Masterplan and plot layout has changed since the assessment was undertaken. Only Plots 3.3, 2.1 and C.2 have been ground truthed.

Figure 0.1 RAG Rating of Wythenshawe Masterplan area



1.5 PROPOSED OVERARCHING BNG STRATEGY

This overarching BNG Strategy is not fixed and will evolve over time. A combination of the below approaches may be required.

On-site provision

The first step will be to assess whether the individual plots can accommodate 10% BNG through the design of the proposed development. This will need to be balanced against the need to deliver high-quality regeneration across Wythenshawe. Where deficits remain and off-site Biodiversity Units (BU) are required the following approach will be pursued:

Off-site provision:

1. Other Masterplan Plots:
 - a. Offset the potential deficit on one plot against another within the Masterplan area with a surplus. Mechanism to be discussed in more detail at a later stage.
 - b. It may be necessary to undertake a baseline habitat assessment for the remaining plots (especially those with vegetative value) and do a high-level review of the post-development units using the current illustrative Masterplan.
2. Utilise other greenspace areas within the Masterplan area
 - a. Work with MCC to understand the baseline condition of other greenspaces within the Masterplan area (taking into account below ground constraints) which may potentially act as BNG off-setting areas. Given the requirement for a 30-year management plan Muse would

not be able to act as the responsible body for off-site areas however, would assist the Manchester City Council (MCC) if this is an approach that it wished to pursue subject to costs being comparable with off-site BU elsewhere.

3. Greater Manchester (GM) Local Nature Recovery Strategy (LNRS) Opportunity Areas
 - a. Work with MCC to understand the baseline condition of other greenspaces outside of the Masterplan boundary but that form part of the GM LNRS Opportunity Areas. Again, Muse wouldn't be the responsible body but could assist MCC if that is a route it sought to consider subject to costs being comparable with off-site BU elsewhere.
4. Off-Site BU Manchester
 - a. Identify all operational habitat banks in the City of Manchester that could accommodate the residual BU requirements (Currently assumed none are present).
5. Off-Site BU Greater Manchester
 - a. Identify all operational habitat banks in Greater Manchester that could accommodate the residual BU requirements.
6. Off-Site BU outside Greater Manchester
 - a. Identify all operational habitat banks outside Greater Manchester but in closest proximity that could accommodate the residual BU requirements.

1.6 SHORT TERM BNG STRATEGY

With large scale developments, BNG is normally delivered at the Masterplan level, where there is an overarching planning application (often an outline planning application) and each plot is brought forward as a phase. Therefore, BNG is delivered at the Masterplan level, and each plot contributes to the overall BNG. However, the WTC development does not have an overarching planning application and as such BNG will need to be met within each planning application individually. As noted previously, the initial three planning applications will be submitted in November 2025.

Therefore, where some applications fall short of the 10% BNG requirement they cannot use future plots to offset the unit deficit as the planning applications are not linked. At the time of writing, Plot C.2 is exempt from BNG under the 'de minimus' exemption and no offsite compensation is required. However, Brotherton House and Alpha House are not exempt and these plots are not currently able to meet the BNG target of 10%, this is mainly due to the number of trees that will be lost as part of the developments.

- Brotherton House – Unit deficit of 1.28 HU however to satisfy the BNG Trading Rules these HU should comprise of 1.45 HU of 'Urban trees'.
- Alpha House – Unit deficit of 0.69 HU and to satisfy the BNG Trading Rules these HU should comprise 0.67 HU of 'Urban trees' and 0.01 HU of 'Mixed scrub'.

Currently to date the Biodiversity Gain Hierarchy has been used to inform the design, i.e. avoid, mitigate, compensate. Options appraisals were run to understand the design constraints and to

minimise disruption to the trees, where possible enhancements to retained habitats were made and on-site creation was maximised. Despite this off-site compensation is required for Plot 3.3 and 2.1 to meet the required 10% BNG.

Three possible solutions have been identified each with their own constraints, in line with the BGH:

1. Utilise plots of land within Masterplan that are providing landscaping but do not have to provide BNG (i.e. are exempt) or provide more than 10% BNG. Possible constraints to this option include:
 - a. Future development owner's commitments and risk of the plots not coming forwards.
 - b. Order to plot development.
 - c. Still may not deliver all units required.
 - d. Legal agreements such as S106 and the mechanism through planning to secure this with each planning application.
2. Offsite within the LPA boundary. It has been identified that opportunity areas for trees, woodland and scrub are present within the immediate area of WTC (Figure 0.2). Whilst these are not set up as habitat banks they have been identified as areas that would be suitable for habitat uplift. However, the setting up of the Habitat Bank mechanism (including registering the land on the NE database, legal agreements etc) would be required for each of these plots and this may take time to achieve. Any such habitat bank system concerning these plots would need to be in place during the planning application determination process of Brotherton House and Alpha House.

Figure 0.2 Opportunity areas identified by the Greater Manchester Local Nature Recovery Strategy



3. Offsite outside of LPA boundary. Four habitat banks are present within the wider Greater Manchester Combined Authority boundary.

1.7 MEDIUM TERM BNG STRATEGY

Where future development plots have been identified within the Masterplan, several of these were identified as having existing vegetative value, including Plots 1.1, 1.2, 1.3, 2.3 and 2.4. As such it is recommended that before moving forward with the remaining plots:

- A ground truth survey of all plots within the Masterplan to understand BNG balances;
- Work with Manchester City Council (MCC) and Greater Manchester Combined Authority (GMCA) to assess the potential of sites within Masterplan/Wythenshawe to be used as habitat banks in the future, of which Muse cannot be a responsible body. It has been identified that opportunity areas from the GMCA Local Nature Recovery Strategy (LNRS) appropriate for the offsite compensation required are located within the immediate area of WTC (Figure 0.2). Whilst these are not set up as habitat banks they have been identified as areas that would be suitable for habitat uplift. However, the setting up of the Habitat Bank mechanism (including registering the land on the NE database, legal agreements etc) would be required for each of these plots and this may take time to achieve.
- Monitor habitat banks within the City of Manchester and wider Greater Manchester area.