

Muse Places

9 Holyrood St
London SE1 2EL

21 November 2025

Our ref: 553440jh29Sep25FV04_BNGA_Exemption_Letter

Dear Vinny Rigby,

WYTHENSHAW C2 THE BIRTLES - BIODIVERSITY NET GAIN EXEMPTION LETTER

INTRODUCTION

Greengage Environmental Ltd (Greengage) was commissioned in July 2025 to undertake a site walkover for an area of land known as C2 The Birtles in Wythenshawe (hereafter referred to as 'the site'), located in Wythenshawe Town Centre, Greater Manchester, M22 5RE, as seen in Appendix A.

The site walkover was undertaken to determine the existing baseline habitat value of the site, in relation to the mandatory Biodiversity Net Gain (BNG) requirement¹. It is understood that the proposals for the site seek the demolition of the existing building, with the site redeveloped with a new five story apartment block and accompanying ground level soft landscape planting.

In accordance with the Environment Act (2021) (see Appendix B), since 12th February 2024, unless exempt², all major planning applications are required to deliver a minimum of 10% BNG. This was extended to include small sites on 2nd April 2024.

BNG is required where a development 'impacts' a habitat to the extent that there is a decrease in biodiversity value, as measured within the Statutory Biodiversity Metric (SBM)¹ or Small Sites Metric (SSM)³.

However, exemptions can apply. One such exemption is the 'de-minimis' exemption, which applies to developments if the following two conditions are met:

- the development must not impact on any on-site priority habitat; and
- if there is an impact on other on-site habitat, that impact must be on less than 25 square meters (m²) (e.g. less than 5m by 5m) of on-site habitat that has a biodiversity unit value of greater than zero, and on less than 5m of on-site linear habitat (such as a hedgerow).



The below has been provided to evidence that, as a result of the site walkover, the 'de-minimis' exemption has been identified to be applicable for the site.

METHODOLOGY

The site walkover was undertaken by Greengage on 20th August 2025 as part of the Preliminary Ecological Appraisal (PEA)⁴ in accordance with guidance in the UK Habitat Classification System (UKHab)⁵ and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017)⁶ Guidelines for Preliminary Ecological Appraisal, in accordance with British Standard (BS) 42020: 2013: Biodiversity⁷. The site walkover identified and mapped the extent and distribution of different habitat types on the site according to the standard UKHab classification methodology. A habitat map was produced to illustrate the results, which is provided as Appendix A. Site photographs are provided as Appendix C.

The Joint Nature Conservation Committee (JNCC) website was reviewed to check the UKHab habitat types recorded on the site against the list of UK Biodiversity Action Plan (BAP) priority habitats⁸.

The UKHab habitat categories and mapping have subsequently been transferred into the SBM. SBM habitats are referred to in Table 1 below.

RESULTS

The baseline habitats identified on the site comprise entirely of an existing building, internal car parking, access roads, and pavements, which are classified as Developed land; sealed surface, a zero-value habitat type within the SBM. Site photographs provided in Appendix C.

None of the habitats identified on the site classify as UK priority habitats.

The baseline habitat types found on-site, area extents and biodiversity values as per the SBM are provided in Table 1 below.

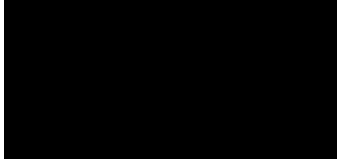
Table 1 On-site habitat types, extent and values

Habitat Type	Extent (square metres/m ²)	Biodiversity Unit Value
Developed land; sealed surface	2817	0.00

Based on the above, and as per current legislation⁹ (see Appendix B), it has been confirmed that the proposed development will impact less than 25m² of on-site habitat, less than 5m of on-site linear habitat, and will not impact any priority habitats. Therefore, no impacts on the existing biodiversity value of the site will occur as a result of the proposed development (as determined by the SBM). Therefore, the development is considered exempt from requiring a formal BNG assessment and from delivering 10% BNG on-site.

However, while not quantified, based on the proposed soft landscape planting plans, the incorporation of ground level planting will result in an increase in biodiversity value of some degree on the site post development compared to the zero baseline biodiversity value, which will be of general benefit for biodiversity.

Yours sincerely



Josh Hurdiss
Consultant



For and on behalf of Greengage Environmental Ltd

APPENDIX A BASELINE HABITATS MAP

Figure A.1 Baseline Habitats Map

WYTHENSHAW C2 THE BIRTLES

-  Red Line Boundary
-  Developed land; sealed surface

Title: A.1 - Baseline Habitats Map

Drawn by: JH
Date: 21/11/2025

Reviewed by: FT
Date: 21/11/2025

Project number: 553440
Sources: Google Satellite Imagery



APPENDIX B LEGISLATION AND POLICY

This BNGA Exemption Letter has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environment Plan (Defra, 2018)¹⁰;
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (Defra, 2011)¹¹;
- National Planning Policy Framework (NPPF) (Ministry of Housing, Communities & Local Government (MHCLG), 2024)¹²;
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006)¹³; and
- The Environment Act (Defra, 2021).

The 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.

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

APPENDIX C SITE PHOTOGRAPHS

Plate C.1 Northern aspect of the building (right and left)



Plate C.2 Western aspect (left) and southern aspect (right) of the building from the internal car parking



Plate C.3 Western aspect of the building and associated hardstanding from outside the internal courtyard (left) and eastern aspect of the building from Wythenshawe Civic main pedestrian street (right) (Source: Google Street View, images dated July 2022)¹⁴



REFERENCES

- ¹ Department for Environment Food and Rural Affairs (Defra)(2024) The Statutory Biodiversity Metric User Guide. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides#:~:text=The%20statutory%20biodiversity%20metric%20tool,the%20statutory%20biodiversity%20metric%20tool>
- ² The Biodiversity Gain Requirements (Exemptions) Regulations 2024. Available at: [The Biodiversity Gain Requirements \(Exemptions\) Regulations 2024](#)
- ³ Defra (2024) The Small Sites Metric (Statutory Biodiversity Metric) User Guide. Available at: Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides#:~:text=The%20statutory%20biodiversity%20metric%20tool,the%20statutory%20biodiversity%20metric%20tool>
- ⁴ Greengage (2025). Preliminary Ecological Appraisal. Report Ref: 553440es18SeptFV01.PEA
- ⁵ UKHab Ltd (2023). UK Habitat Classification Version 2.0. Available at: <https://www.ukhab.org>.
- ⁶ CIEEM (2017); Guidelines for Preliminary Ecological Appraisal, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- ⁷ BSI (2013); British Standard 42020:2013: Biodiversity – Code of practice for planning and development, BSI Standards Publication
- ⁸ Joint Nature Conservation Committee (1992-2012) UK BAP Priority Habitats | JNCC - Adviser to Government on Nature Conservation
- ⁹ Defra (2023) Biodiversity Net Gain: Exempt Developments. Available at: [Biodiversity net gain: exempt developments - GOV.UK \(www.gov.uk\)](#)
- ¹⁰ Defra (2018). UK Government's 25 Year Environment Plan. Available at: <assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf>
- ¹¹ Defra (2011). Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services. Available at: [pb13583-biodiversity-strategy-2020-11111.pdf](#)
- ¹² MHCLG (2024). NPPF. Available at: [National Planning Policy Framework](#)
- ¹³ HMSO (2006). NERC Act. Available at: [Natural Environment and Rural Communities Act 2006](#)
- ¹⁴ Google Street View (2022). Available at: https://www.google.co.uk/maps/@53.3807035,-2.2633953,3a,75y,89.86h,92.33t/data=!3m7!1e1!3m5!1sIWNMftW67MUeQVx8abqEMQ!2e0!6shhttps:%2F%2Fstreetviewpixels-pa.googleapis.com%2Fv1%2Fthumbnail%3Fcb_client%3Dmaps_sv.tactile%26w%3D900%26h%3D600%26pitch%3D-2.33325393927241%26panoid%3DIWNMftW67MUeQVx8abqEMQ%26yaw%3D89.8612850548156!7i16384!8i8192?entry=ttu&g_ep=EgoyMDI1MDkyNC4wIXMDS0ASAFQAw%3D%3D and https://www.google.co.uk/maps/@53.3801934,-2.2620985,3a,75y,344.54h,96.18t/data=!3m7!1e1!3m5!1s2qoR1JjxKel41l1wvt9a1A!2e0!6shhttps:%2F%2Fstreetviewpixels-pa.googleapis.com%2Fv1%2Fthumbnail%3Fcb_client%3Dmaps_sv.tactile%26w%3D900%26h%3D600%26pitch%3D-6.176085167092509%26panoid%3D2qoR1JjxKel41l1wvt9a1A!26yaw%3D344.54208260232343!7i16384!8i8192?entry=ttu&g_ep=EgoyMDI1MDkyNC4wIXMDS0ASAFQAw%3D%3D [online]