



Bridge College

Biodiversity Net Gain Assessment

Walker Simpson Architects

September 2025



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Summary

Envance was commissioned Walker Simpson Architects in August 2025 to undertake a Biodiversity Net Gain Assessment of a site in Openshaw, Manchester (central Ordnance Survey National Grid Reference SJ 87330 97350; hereafter referred to as the 'Site'), with the purpose of extending a section of the east aspect and creating additional parking space (the 'Proposed Development') at the Site

The Site is approximately 0.60 hectares (ha) in area, not including individual trees, and contains the following baseline habitats:

- Built linear features
- Developed land; sealed surface
- Developed land; sealed surface
- Introduced shrub
- Modified grassland
- Other neutral grassland
- Tall forbs

Biodiversity Net Gain

The Site has a calculated overall baseline biodiversity value of 1.06 Habitat Units (HU) and 0.20 Hedgerow Units (HeU). Under current plans, the Proposed Development is predicted to deliver a biodiversity net loss of -0.70 HU and a gain of 0.05 HeU within the application boundary. However, with the inclusion of off-Site mitigation (outside of the application boundary but within the ownership boundary), the Proposed Development is predicted to deliver a biodiversity net gain of +0.12 HU (+11.56%) and +0.07 HeU (+34.99%), exceeding the statutorily required 10% requirement. This satisfies all trading rules present within the SBM.

To offset the loss of other neutral grassland, Tall forbs, modified grassland, and introduced shrub from the Site, it is proposed to enhance c. 0.126 ha of existing modified grassland from poor condition to moderate condition other neutral grassland; with the loss of the individual trees mitigated for by planting 35 native trees within this area. The loss of hedgerows can be mitigated for by additional planting of 56 m of native hedgerow and 49m of ornamental hedgerow. Note that these figures are combining both on-Site and off-Site enhancements and creations.

It should be noted that as this biodiversity net gain may include significant on-Site enhancements and off-Site gains, it is expected that a legal agreement such as a Section 106 agreement with a local planning authority or a conservation covenant with a responsible body may be required to secure their BNG value for at least 30 years. Discussion with the local planning authority should be sought to confirm this need and determine a solution. Delivery of BNG can be secured via the statutory condition and production of a Habitat Management and Monitoring Plan (HMMP).



1. Introduction

1.1 Background

- 1.1.1 Envance was commissioned by Walker Simpson Architects in August 2025 to undertake a Biodiversity Net Gain (BNG) Assessment of a site in Openshaw, Manchester (central Ordnance Survey National Grid Reference SJ 87330 97350; hereafter referred to as the 'Site'), with the purpose of extending a section of the east aspect and creating additional parking space (the 'Proposed Development') at the Site. The Site Boundary and Application Boundary are shown in **Figures 1-2**. This document is intended to be read in conjunction with the Ecological Impact Assessment¹.

1.2 Site Context

- 1.2.1 The Site is currently in use as a special educational school with main education building, support buildings, parking, and a large amount of landscaping throughout the Site. There are extensive Tarmac and paved areas throughout the Site with ornamental hedgerows, modified grassland, introduced shrub and small trees as landscaping. There are also some areas of other neutral grassland that have developed a diverse sward. No Irreplaceable Habitats (**Appendix 1**) were recorded. The Site is broadly bounded extensive urban development, which dominates the surrounding area.
- 1.2.2 Site habitats are primarily common and widespread in the local area. Areas of landscaping, including individual trees and ornamental hedgerows will be lost to the Proposed Development to be replaced with additional developed areas and some new landscaped areas. No evidence of habitat degradation was recorded on the day of survey.

1.3 The Proposed Development

- 1.3.1 The Proposed Development is the extension of the east aspect of the main building, additional car parking space, and associated infrastructure as shown on Drawing **0396-WSA-ZZ-ZZ-DR-A-1503-S4-P07**. Areas outside of the application boundary are not considered when discussing the Proposed Development.
- 1.3.2 The Proposed Development is anticipated to impact more than 25m² of habitats, so is therefore not considered to be exempt under the *de minimis* exemption (see **Appendix 1**). The Proposed Development is considered to be subject to the biodiversity gain condition and this report has been produced to accompany the planning application.

1.4 Purpose of the Report

- 1.4.1 The Biodiversity Assessment considers the baseline survey information collected during the survey undertaken by Envance in September 2024, to enable the completion of the Statutory Biodiversity Metric (SBM) to calculate the pre-development baseline value of the Site, and calculation of the habitat losses /gains as a result of the Proposed Development.
- 1.4.2 This Biodiversity Net Gain Report is broadly based on the Chartered Institute of Ecology and Environmental Management (CIEEM) guidance (CIEEM, 2021) as follows:
- Present the baseline survey undertaken on the Site and to present the results of habitat condition assessment surveys following the Statutory biodiversity metric: User Guide.
 - Provide an overview of the proposed habitats following completion of the Proposed Development based on information supplied by the Applicant.

¹ Envance (2024) Bridge College Ecological Impact Assessment, document reference '0538_EclA_V4'



-
- Present the results of the Defra Statutory Biodiversity Metric (SBM) assessment completed for the Proposed Development.
 - Assess the likelihood of the Proposed Development achieving a net gain in biodiversity through the SBM and outline the associated management objectives for proposed habitats.



2. Methodology

2.1 UKHab Survey

- 2.1.1 A UKHab survey of Site habitats was undertaken by Envance ecologist Daniel Lines ACIEEM on 16th September 2024. The survey identified Site habitats according to the UK Habitat Classification system (UKHab Ltd, 2023) and assessed their condition according to The Statutory Biodiversity Metric - Technical Annex². The abundance of individual plant species was assessed using the DAFOR scale (D = Dominant, A= Abundant, F = Frequent, O = Occasional, R = Rare).

2.2 Biodiversity Calculations

- 2.2.1 Biodiversity accounting metrics were employed to assess the baseline biodiversity value of areas within the application boundary and identify any features of significant value.
- 2.2.2 The Statutory Biodiversity Net Gain Metric (SBM) is a MS Excel spreadsheet that is used to quantify the predicted net-change in biodiversity value (“biodiversity units”) of a proposed development site before and after development. It treats the area-based habitats and linear features such as hedgerows and lines of trees separately, and is based on pre-determined values, along with published written guidance. The latest version of the metric has been used for this assessment (DEFRA, 2024). Habitat measurements were made using digital mapping software (QGIS Geographic Information System version 3.28). Habitat condition was assessed according to the criteria outlined by DEFRA (2024). The baseline survey and condition assessment were undertaken during the UKHab survey.
- 2.2.3 Post-Development habitats were determined from Drawing **0396-WSA-ZZ-ZZ-DR-A-1503-S4-P07**, with proposed habitats mapped and digitised to generate areas for each of the habitats proposed.
- 2.2.4 These pre- and post-enhancement habitat areas were then entered into the SBM Calculation Tool. The SBM then provides a habitat distinctiveness score for each of the baseline and proposed habitats which are pre-assigned scores based on the habitat type.
- 2.2.5 The SBM then assigns a range of pre-assigned factors to each of the proposed habitats. These have been advised by subject knowledge experts and are universal multipliers generated by the SBM itself for the following variables relevant to habitat creation, enhancement, or restoration proposals³;
- Difficulty of creating or restoring/enhancing a habitat: this pre-assigned score is based on how difficult a particular habitat type is to create or restore/enhance,
 - Temporal risk: this is the ‘time to target condition’ for any habitat and determines how long a particular habitat type is likely to take to reach the desired condition score.
 - Spatial risk: This score is based on the distance between the site of habitat loss and any habitat creation/enhancement proposals at any offsite offsetting solutions.

2.3 Policy and Legislation

- 2.3.1 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the 1990 Act.

³ Full details of the calculation methodology are provided in the Statutory Biodiversity Metric – User Guide



2.3.2 The biodiversity net gain regulations most directly relevant to planning are:

- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 which commence biodiversity net gain for most types of new planning applications and provides transitional arrangements for section 73 permissions.
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 which prescribe exemptions for categories of development to which biodiversity net gain does not apply.
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 which amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions in respect of applications for planning permission and the submission and determination of Biodiversity Gain Plans, as well as modifications of Schedule 7A of the Town and Country Planning Act 1990 for phased development.
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 which sets out the modifications for irreplaceable habitat.

2.3.3 Article 37A of The Town and Country Planning (Development Management Procedure) (England) Order 2015 describes the Biodiversity Gain Hierarchy, which is a structured approach designed to maximise biodiversity gains. Broadly, this identifies the following steps to be considered in order when a habitat may be impacted by a development;

- Retention - the avoidance of adverse impacts,
- Enhancement - onsite habitat enhancement,
- Creation - onsite habitat creation,
- Offsite mitigation - gains from an offsite location,
- Biodiversity credits - the purchase of biodiversity credits as a last resort.

2.3.4 In terms of local policy, the Greater Manchester Five-Year Environment Plan 2019 – 2024 indicates that new developments should seek to deliver a net gain in biodiversity, with an emphasis on the use of the Biodiversity Metric.

2.3.5 **Appendix 1** provides further details of policy and legislation.

2.4 Limitations

2.4.1 This report serves to indicate the value of the Site in nature conservation terms based upon the survey data gathered. As with any survey of this kind, the information collected defines the habitat types present, and their condition, and is not intended to be a record of every species present.

2.4.2 All areas of the Site were readily accessible and weather conditions during the survey were good. It is considered that a robust assessment of the Site has been made without any significant limitations.

2.4.3 Numbers within the SBM, especially habitat areas, are subject to two decimal place rounding. Therefore, there may be small apparent margins of error, when in fact these are correct within the SBM and are due to rounding.

2.4.4 Habitat maps present in the Figures have been reproduced from detailed field notes and informed by aerial imager, OS mapping and site maps provided by the client. The accuracy of these Figures is therefore ultimately guided by the accuracy of these sources and can only be relied upon to a certain degree of accuracy.



3. Biodiversity Net Gain

3.1 On-Site Baseline

- 3.1.1 The application boundary supports the baseline habitats shown in **Tables 1 & 2** and **Figure 1**. Photographs are shown in **Appendix 2**. Condition assessment results are presented in **Appendix 3**. There were no watercourse habitats or riparian zones within the application boundary.
- 3.1.2 The total baseline biodiversity of the Site within the application boundary is calculated as;
- 1.06 Habitat Units (HU)
 - 0.20 Hedgerow Units (HeU)

Table 1 - Baseline Area-based Habitats⁴, Condition and Unit Score

Habitat Type and reference	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Approx Area (ha)	Habitat Units (HU)	Description
Modified grassland (H5)	Low	Poor	Area/ compensation not in local strategy/ no local strategy	0.196	0.39	Landscaped grass areas frequently mown and dominated by perennial rye-grass <i>Lolium perenne</i> with only a few other common species throughout (Photograph 1).
Developed land; sealed surface (H2 + H3)	Very low	N/A	Area/ compensation not in local strategy/ no local strategy	0.198	0.00	Paved areas and buildings across the Site (Photographs 2 & 6)
Built linear features (H1)	Very low	N/A	Area/ compensation not in local strategy/ no local strategy	0.188	0.00	Roads within the Site.
Other neutral Grassland (H6)	Medium	Poor	Area/ compensation not in local strategy/ no local strategy	0.019	0.08	Semi-improved grassland present within the east of the Site (Photograph 3). Unmanaged and dominated by fast-growing species indicative of nutrient enriched soils.
Introduced shrub (H4)	Low	Poor	Area/ compensation not in local strategy/ no local strategy	0.014	0.03	Patched of planted non-native shrubs as part of landscaping throughout the Site. These are sparse across areas of open soil. (Photograph 8)
Tall forbs (H7)	Low	Poor	Area/ compensation not in local strategy/ no	0.004	0.01	

⁴ Habitat types are presented in their Statutory Biodiversity Metric format.



Habitat Type and reference	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Approx Area (ha)	Habitat Units (HU)	Description
			local strategy			
Individual trees (17 in total)	Medium	Moderate	Area/ compensation not in local strategy/ no local strategy	0.0692 ⁵	0.55	Various trees throughout the Site, mostly native with some non-native, for landscaping and aesthetic purposes (Photographs 9 & 10)
Total				0.60	1.06	

Table 2 - Baseline Hedgerow-based Habitats⁴, Condition and Unit Score

Hedgerow Type and reference	Hedgerow Distinctiveness	Hedgerow Condition	Strategic Significance	Approx. Length (km)	Hedgerow Units (HeU)	Description
Non-native and ornamental hedgerow (He1)	Very low	Poor	Area/ compensation not in local strategy/ no local strategy	0.197	0.20	Various sections of heavily managed hedgerows planted for aesthetic and landscaping purposes (Photograph 11 & 12).
Total				0.197	0.20	

3.1.1 To achieve a 10% biodiversity net gain, the Proposed Development will need to achieve;

- 1.17 HU
- 0.22 HeU

3.2 Strategic Significance

- 3.2.1 The strategic significance of a site will be determined by areas included within the Local Nature Recovery Strategy (LNRS) produced for a region. The LNRS for Greater Manchester is still in preparation and is not expected until mid-2025.
- 3.2.2 As a LNRS has not yet been published, alternative documents can be used to assign strategic significance. A review of local plans and policies did not highlight the Site as an area designated for nature recovery and therefore cannot achieve 'high strategic significance'.
- 3.2.3 Based on the ecological importance of the Site's location, it is not considered to be ecologically important or provide ecological connectivity to other strategically significant locations. Therefore, it cannot achieve 'medium strategic significance'.
- 3.2.4 For the basis of this assessment the habitats within the Site were assigned 'low strategic significance' as the location was not identified within a local plans or policies and did not provide valuable ecological connectivity to any strategically significant location.

3.3 Post-development

- 3.3.1 The Post-development habitats are based on the current proposed Site layout (**0396-WSA-ZZ-ZZ-DR-A-1503-S4-P07**) and discussions with the architect and college. Post-development habitats are presented in **Tables 3 & 4**, with off-site baseline and post-development habitats (within ownership boundary but outside of application boundary) presented in **Tables 5 to 8**. All habitats are visualised in **Figure 2** and **Figure 4**.

⁵ Not included in overall total area as trees can be layered over other habitat types.



- 3.3.2 The Proposed Development will result in the loss of all habitats with exception of a parcel of modified grassland (designated for enhancements) on the northeastern Site boundary and 4 individual trees. It is also expected that the majority of existing hedgerow within the Development boundary will be lost. It is anticipated that the existing developed land; sealed surface will be retained or resurfaced as necessary.

3.4 Mitigation Hierarchy

Retention

- 3.4.1 Four individual trees have been retained (three trees within G16 and one tree in G17). It is not considered possible to retain any remaining habitats as the Development would not be able to occur without their removal.

Enhancement

- 3.4.2 The area of modified grassland on the north-east boundary of the site (0.02 ha) will be enhanced from poor condition modified grassland to moderate condition other neutral grassland through an appropriate management regime, and wildflower planting.

Creation

- 3.4.3 The area of modified grassland in the centre of the Site is expected to be re planted and expanded (total area of parcel 0.02 ha) to facilitate the planting of 4 individual trees and 29m of ornamental hedgerow within this area.
- 3.4.4 56 m of native hedgerow will be planted adjacent to the area of enhanced grassland.

Off-site mitigation

- 3.4.5 The remaining biodiversity loss can be mitigated for 'off-site', which is in within the ownership boundary but outside of the application boundary.
- 3.4.6 To offset the loss of other neutral grassland, modified grassland and introduced shrub, and tall forbs from the Site, it is proposed to enhance c. 0.104 ha of existing modified grassland from poor condition to moderate condition other neutral grassland through an appropriate management regime, and wildflower planting. 20 m of ornamental hedgerow will be planted to connect existing hedgerows, He4 and He5. The loss of the individual trees can be mitigated for here by additional planting of 31 native trees within this area. The remaining habitats and hedgerows within the offsite area will be retained.
- 3.4.7 As the development is associated with a SEN school with relatively low pupil numbers, the risk of disturbance to the enhanced habitats is considered low.
- 3.4.8 This accounts for all losses, so no further stages are necessary.



Table 3 - Post-development Area-based Habitats, Condition and Unit Scores

Habitat Type and reference	Intervention action	Habitat Distinctiveness	Target Condition	Strategic Significance	Approx. Area (ha)	Habitat Units (HU)
Other neutral grassland (H5)	Enhancement	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.022	0.14
Individual trees (4)	Creation	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.0163	0.05
Developed land; sealed surface (PD1 + PD2)	Creation	Very low	N/A	Area/compensation not in local strategy/ no local strategy	0.577	0.00
Modified grassland (PD3)	Creation	Low	Poor	Area/compensation not in local strategy/ no local strategy	0.022	0.04
Individual tree (4)	Retention	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.163	0.13
Total					0.60	0.36

Table 4 - Post-development Hedgerow-based Habitats, Condition and Unit Scores

Hedgerow Type and reference	Intervention action	Habitat Distinctiveness	Target Condition	Strategic Significance	Approx. Length (km)	Hedgerow Units (HeU)
Non-native and ornamental hedgerow (He1)	Retention	Very Low	Poor	Area/compensation not in local strategy/ no local strategy	0.031	0.03
Native hedgerow (He2)	Creation	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.056	0.19
Non-native and ornamental hedgerow (He3)	Creation	Very Low	Poor	Area/compensation not in local strategy/ no local strategy	0.029	0.03
Total					0.116	0.25

3.4.9 The post-development biodiversity value of the Site within the application boundary is;

- 0.36 HU. This represents a loss of -0.70HU (-66.02%).
- 0.25 HeU. This represents a gain of 0.05 HeU (25.09%)



Table 5 – Off-Site Area-based Baseline Habitats, Condition and Unit Scores.

Habitat Type and reference	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Approx Area (ha)	Habitat Units (HU)
Modified grassland (P1)	Low	Poor	Area/ compensation not in local strategy/ no local strategy	0.0069	0.01
Modified grassland (P2)	Low	Poor	Area/ compensation not in local strategy/ no local strategy	0.0228	0.05
Modified grassland (P3)	Low	Poor	Area/ compensation not in local strategy/ no local strategy	0.0983	0.20
Modified grassland (P4)	Low	Poor	Area/ compensation not in local strategy/ no local strategy	0.0047	0.01
Modified grassland (P5)	Low	Poor	Area/ compensation not in local strategy/ no local strategy	0.0024	0.00
Other neutral grassland (H6)	Medium	Poor	Area/ compensation not in local strategy/ no local strategy	0.0047	0.02
Total				0.14	0.29

Table 6 - Off-Site Hedgerow-based Baseline Habitats, Condition and Unit Scores.

Hedgerow Type and reference	Hedgerow Distinctiveness	Hedgerow Condition	Strategic Significance	Approx Length (km)	Hedgerow Units (HeU)
Ornamental hedgerow (He4)	V.Low	Poor	Area/compensation not in local strategy/ no local strategy	0.074	0.07
Ornamental hedgerow (He5)	V.Low	Poor	Area/compensation not in local strategy/ no local strategy	0.065	0.06
Total				0.14	0.14

Table 7 - Off-Site Area-based Post Development Habitats, Condition and Unit Score.

Habitat Type and	Intervention	Habitat Distinctiveness	Baseline Habitat/	Target Condition	Strategic Significance	Approx Area	Habitat Units (HU)
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reference	action	veness	condition			(ha)	
Individual trees (31)	Creation	Medium	N/A	Moderate	Area/compensati on not in local strategy/ no local strategy	0.1262	0.39
Other neutral grassland (P2)	Enhance	Medium	Modified grassland/ Moderate	Moderate	Area/compensati on not in local strategy/ no local strategy	0.0228	0.14
Other neutral grassland (P3)	Enhance	Medium	Modified grassland/ Moderate	Moderate	Area/compensati on not in local strategy/ no local strategy	0.0812	0.50
Modified grassland (P3)	Retentio n	Low	Modified grassland/ Poor	Poor	Area/compensati on not in local strategy/ no local strategy	0.0171	0.03
Modified grassland (P1, P4, P5)	Retentio n	Low	Modified grassland/ Poor	Poor	Area/compensati on not in local strategy/ no local strategy	0.014	0.02
Other neutral grassland (H6)	Retentio n	Medium	Other neutral grassland/ Poor	Poor	Area/compensati on not in local strategy/ no local strategy	0.0047	0.02
Total						0.14	1.11

Table 8 – Off-Site Hedgerow-based Post Development Habitats, Condition and Unit Scores.

Hedgerow Type and reference	Intervention action	Habitat Distincti-veness	Target Condition	Strategic Significance	Approx . Length (km)	Hedgerow Unit (HeU)
Ornamental hedgerow (He4)	Retention	V.Low	Poor	Area/compensation not in local strategy/ no local strategy	0.074	0.07
Ornamental hedgerow (He5)	Retention	V.Low	Poor	Area/compensation not in local strategy/ no local strategy	0.065	0.06
Ornamental hedgerow (He6)	Creation	V.Low	Poor	Area/compensation not in local strategy/ no local strategy	0.02	0.02
Total					0.16	0.16

3.4.10 Following the Off-site mitigation detailed previously in the mitigation hierarchy, it is expected that there will be a gain of 0.82 HU and 0.02 HeU for Off-site habitats.

3.4.11 Taking into account off-Site gains, the combined net unit change of the Development is;



- + 0.12 HU (+ 11.56%)
- + 0.07 HeU (+ 34.99%)

3.4.12 The target condition criteria for newly created habitat are provided in **Appendix 3**.

3.5 Biodiversity Net Gain Calculations

3.5.1 Therefore, it is predicted that the statutorily required 10% biodiversity net gain target can be achieved within land in control of the applicant with no further mitigation required.

3.6 Trading Rules

3.6.1 The Proposed Development results in a loss of other neutral grassland and individual trees, both medium distinctiveness habitats. Under habitat trading rules present within the SBM, losses in medium distinctiveness habitats or higher must be mitigated for by similar habitats.

With gains in other neutral grassland and individual trees from the off-Site mitigation, all losses in these habitat types can be accounted for. Therefore, all trading rules can be satisfied.



4. References

CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK

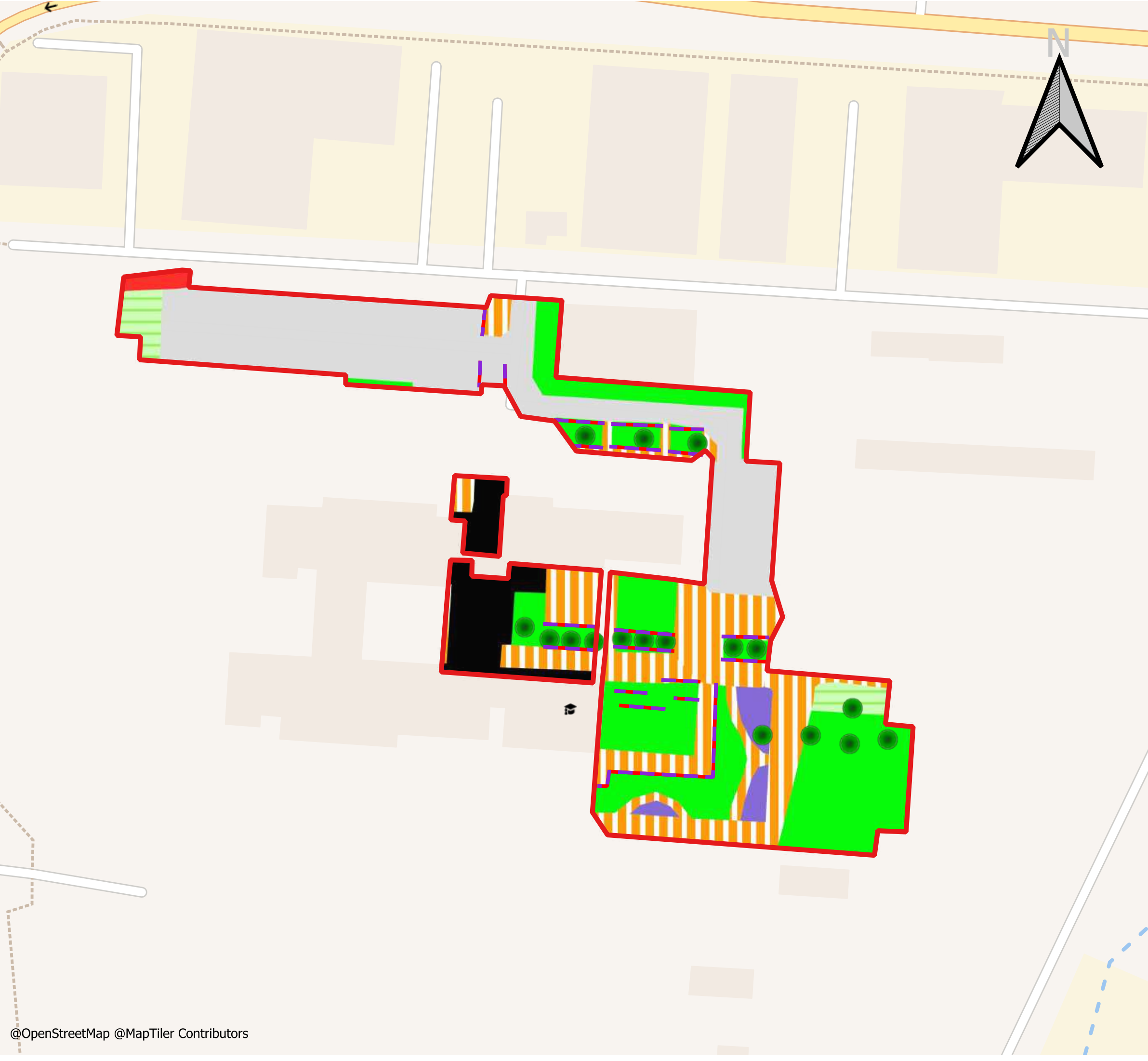
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5. Figures

Figure 1 - Baseline Habitats



Legend

-  Site boundary
-  H1 - Built linear features
-  H3 -Developed land; sealed surface
-  H4 - Introduced shrub
-  H5 - Modified grassland
-  H6 - Other neutral grassland
-  H7 - Tall forbs
-  H2 - Building
-  He1 - Non-native and ornamental hedgerow
-  Individual trees (17)



Bridge College

Baseline Habitats

Date	August 2025
Scale	1:750@A3
Drawing Ref:	0538_BH_V5



Unit 9
Acorn Business Park
Heaton Ln
Stockport
SK4 1AS

0161 327 1 723

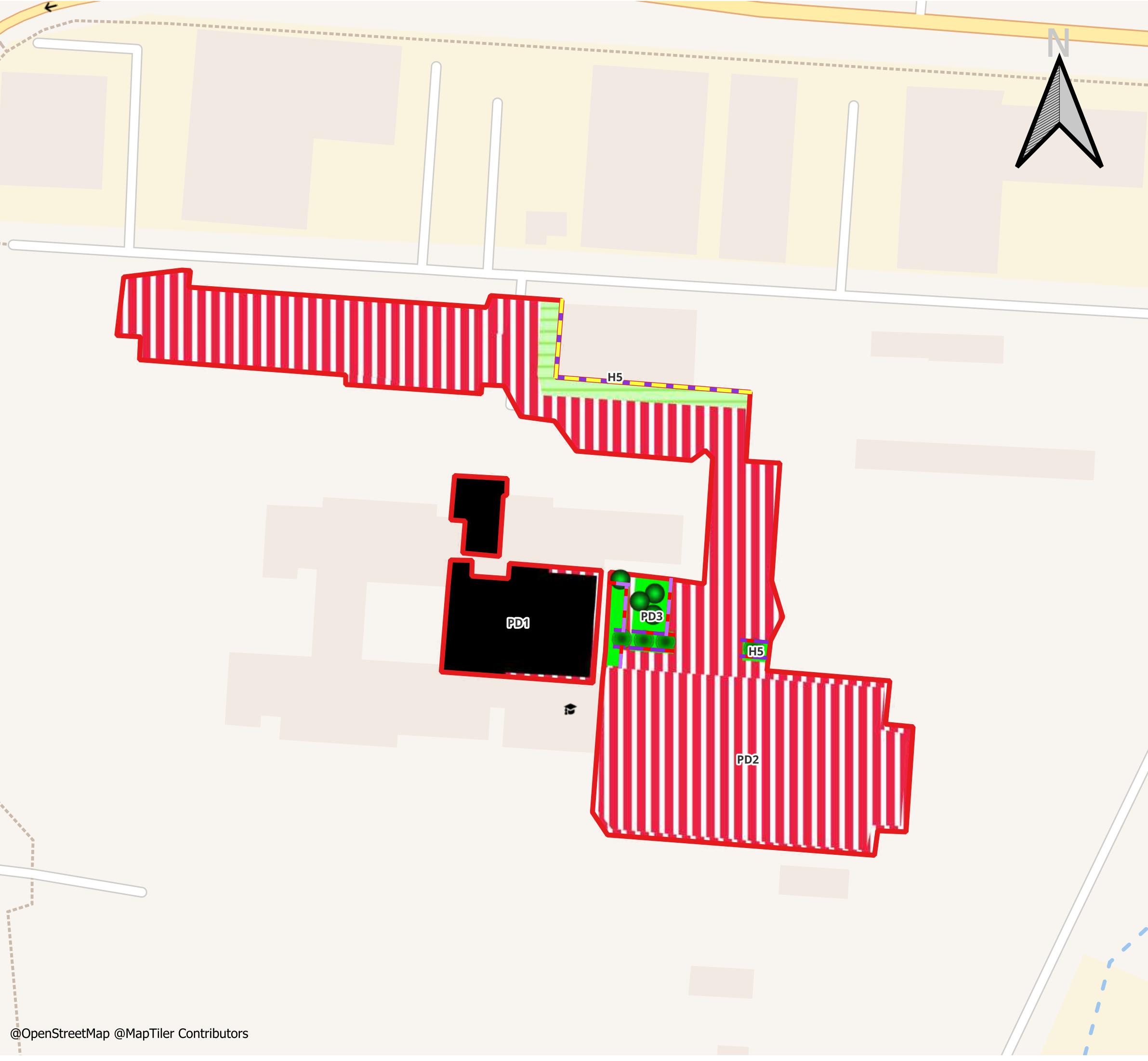
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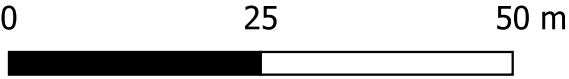
Figure 2 - Proposed Site layout

Please note that locations of new small trees and to be created hedgerow are indicative only.



Legend

- Site boundary
- PD2 - Developed land; sealed surface
- H5 and PD3 - Modified grassland
- Enhanced H5 - Other neutral grassland
- PD1 - Building
- He1 - retained hedegrows
- He2 - newly planted native hedgerow
- He3 - newly planted ornamenntal hedgerow
- Newly planted trees (4)
- Existing trees (4)



Bridge College

Post Development Habitats

Date	August 2025
Scale	1:750@A3
Drawing Ref:	0538_PDH_V5



Unit 9
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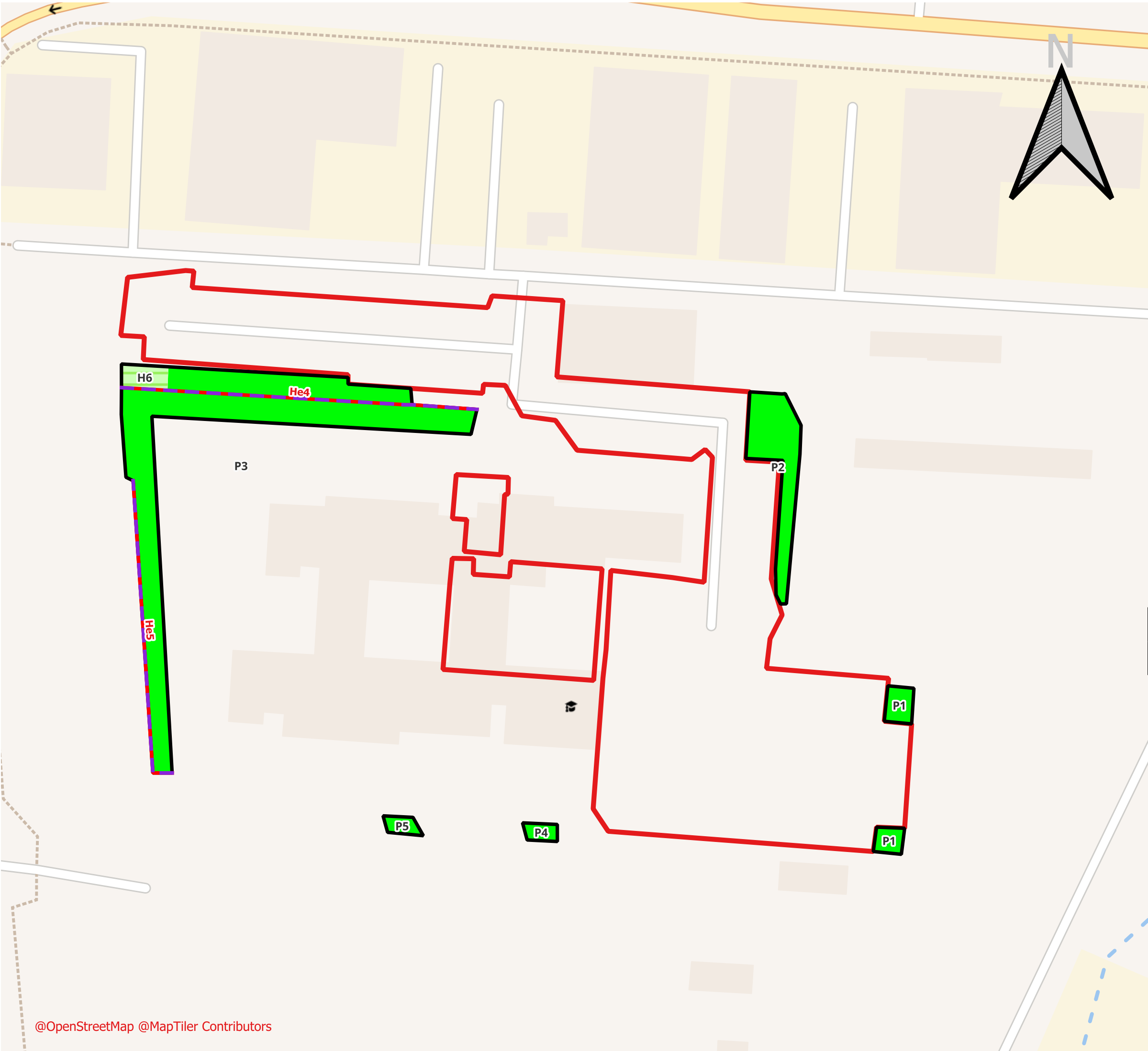
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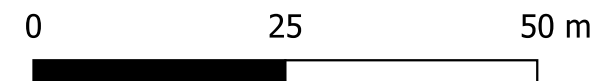


Figure 3 Offsite Baseline Habitats



Legend

- Site boundary
- Off-site boundary
- P1, P2, P3, P4, P5 - Modified grassland
- H6 - Other neutral grassland
- He4, He5 - Non-native and ornamental hedgerow



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Off-site Baseine Habitats

Date	August 2025
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Scale	1:750@A3
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Drawing Ref:	0538-OBH-V1
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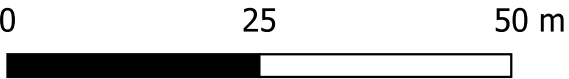
Figure 4 Offsite Proposed Habitats



Legend

Updated 21/08/25

- Site boundary
- Off-site boundary
- P1, P4, P5 - Modified grassland
- P2, P3, H6 - Other neutral grassland
- He4 - Non-native and ornamental hedgerow
- He5 - Non-native and ornamental hedgerow
- He6 - To be planted Non-native and ornamental hedgerow
- Newly planted trees (31)



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Off-site Baseine Habitats

Date	August 2025
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Drawing Ref:	0538-OBH-V1



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Appendix 1. Legislation and Policy

Legislation

Town and Country Planning Act 1990 – Biodiversity Net Gain

Under Schedule 7A of the Town and Country Planning Act 1990 (inserted by Schedule 14 of the Environment Act 2021), grants of planning permission are to be subject to a condition to secure that the biodiversity net gain objective is met. Specifically;

- The biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.
- The biodiversity value attributable to the development is the total of—
 - the post-development biodiversity value of the onsite habitat,
 - the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and
 - the biodiversity value of any biodiversity credits purchased for the development.
- The relevant percentage is 10%.
- The Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.

The Schedule goes on to emphasise the use of the most recent version of the Statutory Biodiversity Metric, detail from when the baseline biodiversity of a relevant Site should be calculated, how post-development biodiversity values should be calculated, and how off-site biodiversity gains should be registered and calculated.

Exemptions

Certain types of developments are exempt from the mandatory biodiversity net gain condition –

- Existing planning applications - If a planning application for a development was made before day one of mandatory BNG on 12 February 2024, the development is exempt from BNG. This also applies to retrospective planning permissions made under section 73A and section 73 permissions where the original permission which the section 73 relates to was either granted before 12 February 2024 or the application for the original permission was made before 12 February 2024,
- Householder development - Development which is subject of a householder application as defined within Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015,
- Development subject to the de minimis exemption - Development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of onsite habitat, or 5 metres of linear habitats such as hedgerows,
- Self-build and custom build development - Developments which:
 - consists of no more than 9 dwellings, and
 - is carried out on a site which has an area no larger than 0.5 hectares, and
 - consists exclusively of dwellings which are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015.
- Urgent Crown development granted permission under section 293A of the Town and Country Planning Act 1990,



- Developments that are granted planning permission by a development order (including permitted development rights),
- Development of a biodiversity gain site - Development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the biodiversity gain condition which applies in relation to another development,
- Development related to the high speed railway transport network - Development forming part of, or ancillary to, the high speed railway transport network comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013

The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024

This legislation includes a schedule in the form of two tables which list 'irreplaceable habitats'. These habitats are considered too rare or difficult to reproduce to be subject to standard biodiversity net gain principles, and must therefore be mitigated for with bespoke compensation if impacted at all. The list of habitats is as follows;

- Blanket bog
- Lowland fens
- Limestone pavements
- Coastal sand dunes
- Ancient woodland
- Ancient trees and veteran trees
- Spartina saltmarsh swards
- Mediterranean saltmarsh scrub

The Town and Country Planning (Development Management Procedure) (England) Order 2015

Section 73A describes the biodiversity gain hierarchy, which is copied below in its entirety.

In this Part, "biodiversity gain hierarchy" means the following actions in the following order of priority—

(a) in relation to onsite habitat with a habitat distinctiveness score, applied in the biodiversity metric, equal to or higher than four—

(i) avoiding adverse effects of the development, or

(ii) insofar as those adverse effects cannot be avoided, mitigating those effects;

(b) in relation to any onsite habitat which is adversely affected by the development, compensating for that adverse effect by—

(i) habitat enhancement of onsite habitat;

(ii) insofar as there cannot be that enhancement, creation of onsite habitat;

(iii) insofar as there cannot be that creation, the availability of registered offsite biodiversity gain for allocation to the development;

(iv) insofar as registered offsite biodiversity gain cannot be allocated to the development, the purchase of biodiversity credits

Policy

National Planning Policy Framework

The National Planning Policy Framework (NPPF, 2023) sets out the Government's planning policies for England and how these are expected to be applied. Section 15 of the NPPF deals with conserving and enhancing the



natural environment. Habitats and biodiversity are specifically referenced in paragraphs 179 to 182, as copied below.

179. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard 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 areas identified by national and local partnerships for habitat management, enhancement, restoration or creation;
- and
- b) promote the conservation, restoration and enhancement 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.

180. When determining planning applications, local planning authorities should apply the following principles:

- a) 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;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) 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
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

181. The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites⁶⁴; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

182. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

The Greater Manchester Five-Year Environment Plan 2019 - 2024

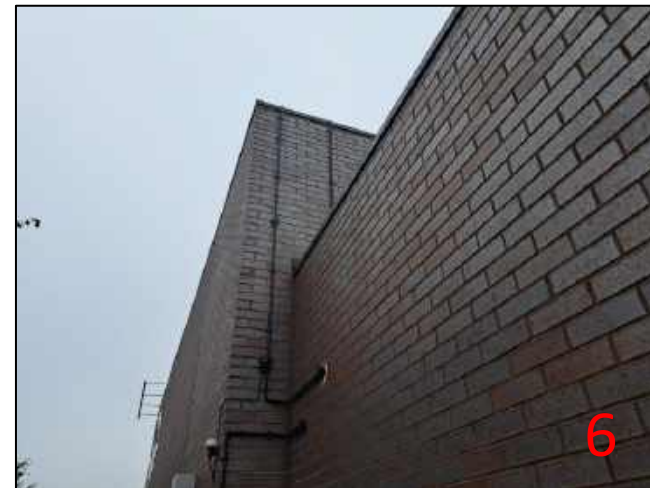
The Greater Manchester Five-Year environmental plan sets out the current state of the environment within the region and outlines the long-term visions and aims for the future. **Section 3 -Priority 3** states that new developments should aim to deliver a net gain in biodiversity. The Greater Manchester Combined Authority



has published further guidance (2021) in support of the plan which emphasises the use of the Biodiversity Metric (Natural England 2022) within planning applications.



Appendix 2. Photographs



Legend

Photo 1. – Area of modified grassland

Photo 2. - Paved area

Photo 3. – East area of other neutral grassland

Photo 4. -South area of other neutral grassland

Photo 5. –West area of other neutral grassland

Photo 6. – Typical building construction on Site

Photo 7. – Tall forbs dominated by buddleja with some small trees within

Photo 8. – Ornamental shrub planting

Photo 9. – Individual trees alongside buildings

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Legend

Photo 10. – Individual trees to east of Site

Photo 11. -Tall beech ornamental hedgerow to provide screening

Photo 12. – Small beech and common box hedgerow for landscaping

Photo 13. – Green roof visible on roof of main building

Photo 14. –Bramble scrub area

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Appendix 2: Photographs



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Appendix 3. Statutory Biodiversity Metric Condition Assessment Criteria

Tables A3.1 - A3.4 details the results of the condition assessment for each habitat type according to SBM condition criteria. Condition assessments are not required for developed land; sealed surface and built linear features as they are not considered to have any biodiversity value. Condition assessments are also not required for introduced shrub as the qualifying features of this habitat do not allow it to reach any other condition than poor.

Grassland

Other neutral grassland

Table A3. 1 - Condition assessment of the other neutral grassland on Site (H6).

Criteria	Description	Pass/Fail
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type. Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Pass
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Fail
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Fail
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Fail
E	Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species (as listed on Schedule 9 of WCA5) are present, this criterion is automatically failed.	Fail
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	Fail
Final Assessment		Condition
The east area is rank grassland that has a high proportion of species indicative of suboptimal condition and scrub. The west area has a more diverse sward with microclimates for invertebrates.		Poor

Modified Grassland

Table A3. 2- Condition assessment of the modified grassland on Site (H5).

Criteria	Description	Pass/Fail
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs. Note - this criterion is essential for achieving Moderate or Good condition.	Fail
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Fail



Criteria	Description	Pass/Fail
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).	Pass
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Fail
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Pass
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Pass
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA).	Pass
Final Assessment		Condition
Landscaped grass areas frequently mown and dominated by perennial rye-grass with only a few other common species throughout.		Poor

Urban

Tall Forbs

Table A3. 3 - Condition assessment of the tall forbs within the Site (H7).

Criteria	Description	Pass/Fail
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	Fail
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Fail
C	Invasive non-native plant species (listed on Schedule 9 of WCA1) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area. Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Pass
Final Assessment		Condition
A small area completely dominated by buddleia with only a few other ground cover species present.		Poor

Individual trees

Urban tree

Table A3. 4 - Condition assessment of the small individual trees within the Site.

Criteria	Description	Pass/Fail
A	The tree is a native species (or at least 70% within the block are native species).	Pass/Fail
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5m wide (individual trees automatically pass this criterion).	Pass
C	The tree is mature (or more than 50% within the block are mature).	Fail
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Pass
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Fail



Criteria	Description	Pass/Fail
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Pass
Final Assessment		Condition
Trees planted throughout the Site as landscaping. All are immature and lack ecological niches. Most are native, however some are non-native – this does not change the condition.		Moderate

Tables A3.5 and A3.6 detail the anticipated condition of created habitat types based on expected management practices and what is realistically achievable in the local environment.

Grassland

Other neutral grassland

Table A3. 5 - Expected condition assessment of the other neutral grassland enhanced as part of the Development.

Criteria	Description	Pass/Fail
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type. Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Pass
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Pass
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Pass
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Pass
E	Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species (as listed on Schedule 9 of WCA5) are present, this criterion is automatically failed.	Pass
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	Fail
Final Assessment		Condition
By incorporating an infrequent cut and collect management regime with additional seeding as required, it is expected that all criteria except F can be passed.		Moderate

Individual trees

Urban tree

Table A3. 6 - Expected condition assessment of the individual trees created as part of the Development.

Criteria	Description	Pass/Fail
A	The tree is a native species (or at least 70% within the block are native species).	Pass
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5m wide (individual trees	Pass



Criteria	Description	Pass/Fail
	automatically pass this criterion).	
C	The tree is mature (or more than 50% within the block are mature).	Fail
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Pass
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Fail
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Pass
Final Assessment		Condition
Newly planted trees are anticipated to be native and managed at a low-intensity. It is not expected that they would reach maturity or develop ecological niches, limiting their condition to moderate.		Moderate

Hedgerows

Native hedgerow

Table A3. 7 - Expected condition assessment of the hedgerow at the northeastern boundary of the Site.

Criteria	Description	Pass/Fail
A1	Height >1.5 m average along length	Pass
A2	Length >1.5 m average along length	Pass
B1	Gap between ground and base of canopy <0.5 m for >90% of length	Pass
B2	Gaps make up <10% of total length; and No canopy gaps >5 m	Pass
C1	>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: • Measured from outer edge of hedgerow; and • Is present on one side of the hedgerow (at least)	Fail
C2	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground	Fail
D1	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA) and recently introduced species	Pass
D2	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities	Pass
Final Assessment		Condition
		Moderate



Appendix 4. Statutory Biodiversity Metric Calculation Tool

See separate submitted metric (0538_SBM_V6)