BURO HAPPOLD

Poulton Building

Biodiversity Net Gain Assessment Report

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1 Introduction

Buro Happold has been appointed by Mayfield Poulton Ltd, to provide ecology consultancy services in support of a planning application for the Poulton Building development. This Biodiversity Net Gain (BNG) report describes and assesses the Poulton Building development area only (hereafter referred to as the 'site').

The proposals were submitted to Manchester City Council (MCC) as the local planning authority (LPA), who have requested a BNG assessment using the Defra Statutory Biodiversity Metric 4.0 to validate the planning application, with biodiversity outcomes assessed relative to the established 2019 baseline, which was previously agreed for the wider Mayfield site.

Prior to production of this report, Buro Happold undertook a mapping exercise to confirm the applicability of mandatory BNG. It was confirmed that the proposed development would result in the loss of habitats exceeding the 25m^2 threshold, thereby meeting the statutory trigger for mandatory BNG. The mapping also identified that the 2019 baseline habitats within the site, subject to loss, include areas of modified grassland and bramble scrub, which will be addressed within the BNG assessment.

Biodiversity net gain 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 through the use of the Statutory Biodiversity Metric due to the Environment Act (2021).

1.1 Site Background

As illustrated in Figure 1-1, the site is located at Baring Street, Manchester (central grid reference: SJ 85032 97553).

The site has been cleared since the original baseline assessment in 2019. Previous habitats present included hardstanding areas, modified grassland and bramble scrub. The site now boasts standing water from lack of drainage and associated marginal habitats have started establishing. The site is surrounded by Mayfield Park and the River Medlock to the north, which comprises various biodiverse habitats including wildflower meadows, grassland, scrub and trees, which have been implemented as part of the wider masterplan. The remainder of the surrounding environment consists of residential homes and gardens, industrial areas and warehouses and patches of green spaces towards the south.

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Figure 1-1 Location of the site within the wider landscape (May 2026, sourced from Bing Map Data)

1.2 Site Proposal

The proposed development includes the erection of the Poulton Building and associated soft landscaping.

1.3 Aims and Objectives

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

As such, this report aims to:

- Present the baseline habitat, hedgerow, and watercourse value of the development site, based on the 2019 baseline habitats.
- Present a scenario which evidences how the proposed development can reach at least the minimum 10% net gain threshold, based on available information relating to post-development design for the habitats.
- Present the potential overall net value change in both units and a percent change.

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2 Methodology

Since the Ecology Strategy (Buro Happold, 2019) was produced with the supporting BNG calculations, it has been updated numerous times to reflect design amendments and additional details within development plots. In addition, the Natural England Biodiversity Metric has gone through several updates, with the latest iteration of the Biodiversity Metric 4.0 released in February 2023. This metric will be used for the Poulton Building application site.

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:
    - Update Ecology Strategy with Biodiversity Net Gain – Phase 1 Technical Note, Buro Happold (2019)
- Post-development development:
    - Baring Street Office No. 1, Landscape General Arrangement, Studio Egret West (March 2026)

2.1 Pre-development habitat baseline approach

The baseline BNG calculations, as outlined in Section 3.1, provide a numerical habitat value which indicates the existing value of the habitats present on the site based on the identified habitat types and their condition score as assessed by suitably experienced ecologists to align recorded habitats with the UK Habitat Classification System (UKHab; Butcher et al., 2023).

A BNG assessment previously completed for the wider Mayfield Phase 1 development in 2019 established the ecological baseline position and this is the baseline requested to be used by MCC, which will be applied directly to the site.

The habitats were mapped using QGIS software and aligned with OS mapping data to ensure the most accurate display of information possible was created. The areas of each habitat have been extracted from the mapped data and inputted into the baseline worksheets of the metric.

A summary of the habitats identified on site, a description of their condition and a plan of their distribution on site are provided in Section 3.1 of this report.

2.2 Post-development habitat approach

The post-development BNG calculations, as outlined in Section 3.2, provide a proposed numerical habitat value based on information available relating to post-development landscape design. This includes consideration of habitat retention and enhancement and potential creation which have been built into the calculations presented in the metric. Post development landscaping, including the retention of ecologically valuable habitat where possible, has been developed through ongoing workshops and consultations within the design team in order to best support the development in minimising loss and support the proposed development to a biodiversity net gain. The proposed

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habitats, presented in this assessment are adapted from the illustrative landscape general arrangement plan (Studio Egret West, 2026).

2.2.1 Strategic Significance Approach

In the Statutory Biodiversity Metric 4.0 strategic significance is a location-based multiplier, used to reflect how important a habitat is within the wider ecological network. It is driven by the Local Nature Recovery Strategy (LNRS) if there is one produced, which identifies areas for habitat creation and opportunity networks.

The site falls under the Greater Manchester LNRS and therefore is attributed a high strategic significance at both baseline and post-development.

2.2.2 Bespoke assessment

The assessment forms the basis of a bespoke approach which we will seek agreement with the Local Planning Authority (LPA) as part of the review and the determination process, reflecting the overlap with the park, the prior delivery of mitigation, and the wider Mayfield Ecology Strategy. We will:

- Identify that achieving full compliance with post-development trading rules is likely to be challenging due to the presence of baseline ONG and scattered scrub habitats, which are difficult to replace on a like-for-like basis within the constrained site.
- Account for pre-works associated with the delivery of Mayfield Park, which have already removed or altered habitats within the Poulton Building red line boundary and provided mitigation as part of those earlier works.
- Describe the existing rain garden already delivered within the Poulton Building red line; and
- Identify any additional habitats or planting proposed as part of the Poulton Building design.

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3 Biodiversity net gain

3.1 Pre-development biodiversity value

3.1.1 Habitats on site

The habitats recorded within the 2019 baseline, include sections of buildings, hardstanding, modified grassland and bramble scrub. The site has since been cleared as part of the wider Mayfield development and using aerial imagery (Bing Map Data, May 2026), it appears as though the site is dominated by bare ground which has become waterlogged, with some vegetation establishing around the edges, In addition, since its clearance a rain garden was installed as part of the Republic boundary, which allowed this rain garden to be delivered under either permission to allow for flexibility.

Table 3-1 summarises the habitats identified on site in the 2019 baseline and the BNG metric equivalent used to calculate the baseline value in biodiversity units. Figure 3-1 spatially represents the habitats identified on site.

Table 3-1 Pre-development habitat type, distinctiveness, condition and area

Habitat type	Distinctiveness	Condition	Area Ha	Habitat units
Developed land; sealed surface	V. Low	N/A	0.285	0.00
Modified grassland	Low	Poor	0.002	0.00
Bramble scrub	Medium	Poor	0.001	0.00
			Total:	0.01

The habitat units for each habitat type are shown as 0.00 as the value is too low for the Statutory Biodiversity Metric 4.0 calculator, however, overall, the site has 0.01 habitat units at the 2019 baseline. In order for the development to deliver a 10% net gain for biodiversity associated with habitats, the post-development landscaping across both the retained, enhanced and created habitats on site would need to provide a minimum of **0.011** habitat units.

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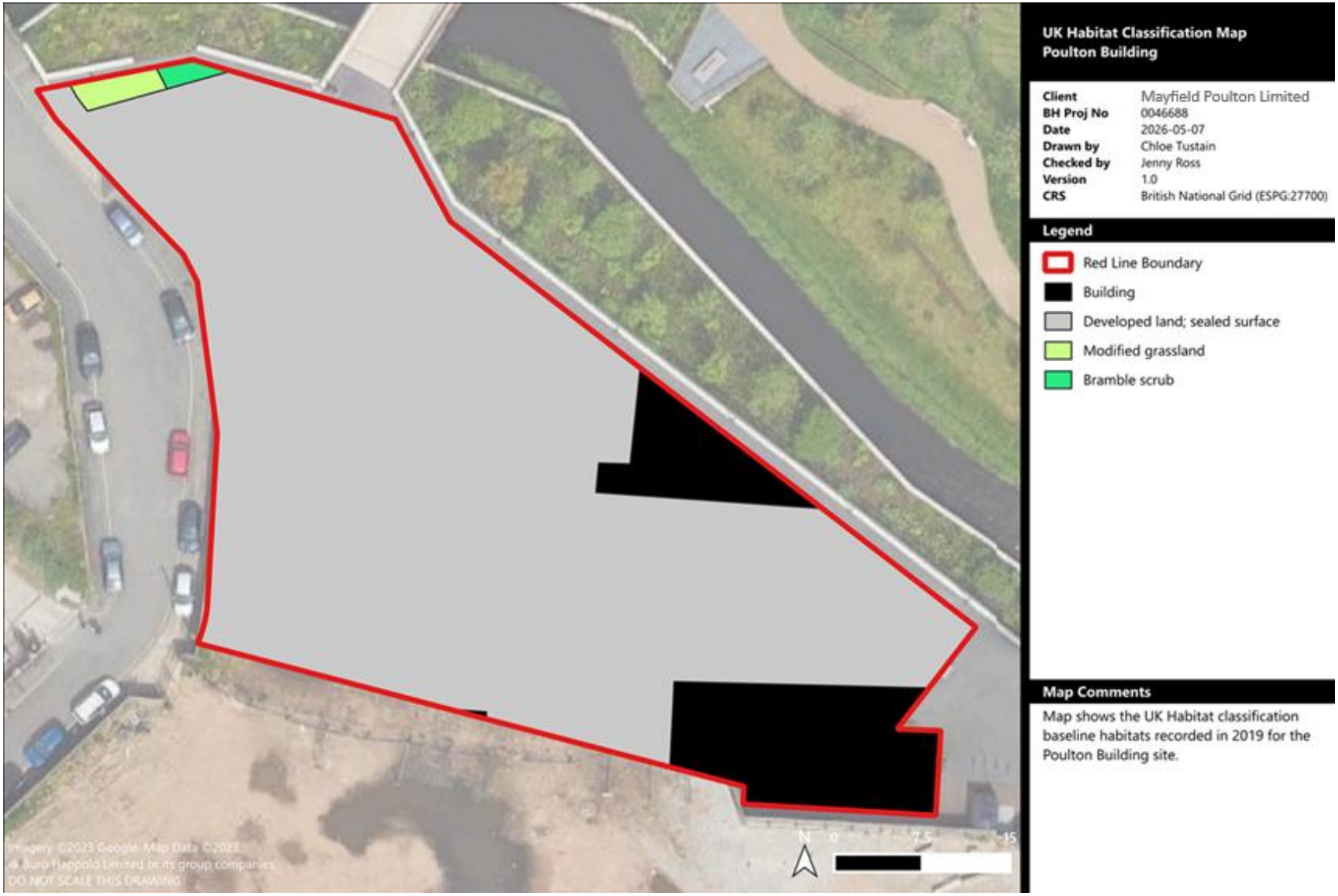

Figure 3-1 Baseline habitat map of the site

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3.1.2 Summary of pre-development biodiversity value

Utilising the habitat types, condition scores and strategic significance applied to each habitat area the baseline value of the site has been determined through the use of the Statutory Biodiversity Metric 4.0. A full copy of the metric is submitted alongside this report and should be referenced for further detail on the habitat values specifically. Table 3-2 summarises the baseline value for the combined habitat types. The table further identifies what uplift would be required for the site to achieve the minimum 10% net gain target for BNG on site.

Table 3-2 Baseline biodiversity unit values and required uplift to achieve 10% net gain

Unit type	Calculated baseline value	10% net gain requirement
Habitats	0.01	0.011

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3.2 Post-development biodiversity value

3.2.1 Retention/ Enhancement/ Removal

3.2.1.1 Habitats

All of the habitats recorded from the 2019 baseline were removed as part of the wider Mayfield development.

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3.2.2 Proposed habitats, hedgerows and watercourses

3.2.2.1 Habitats

The translation of the habitats from landscaping type to UK Habitats Classification System habitat type equivalent, which applies to the biodiversity metric and justification for allocated conditions is summarised in Table 3-3. The translations are based off the species information provided by the landscape general arrangement plans (doc reference: 0198_MAY-SEW-SW1-SH-L-00100, Studio Egret West, 2026). Table 3-4 provides a summary of the post-development habitat creation.

Table 3-3 Illustrative masterplan plan planting types to UK Habitat Biodiversity Metric justification

Proposed development/ landscaping	BNG habitat equivalent	Justification
Proposed tree x 5 Size: semi-mature	Urban tree	A total of five trees will be planted across the site. These fall under the UK Hab description for urban trees due to the urban nature of the development and that they are individual planted trees. The tree species are non-native species.
Planting Type 01 Herbaceous, ornamental grass and shrub planting	Introduced shrub	The proposed planting across Beds 01–05 comprises a diverse mix of herbaceous perennials, grasses, bulbs, shrubs and occasional trees, with a strong emphasis on ornamental, non-native species typical of designed urban landscapes. The majority of the planting palette includes flowering perennials such as aster (*Aster ageratoides*), yarrow (*Achillea filipendulina*), globe thistle (*Echinops ritro*) and cranesbill (*Geranium phaeum*), alongside structural grasses including Japanese forest grass (*Hakonechloa macra*) and pheasant's tail grass (*Anemanthele lessoniana*), and seasonal bulb planting such as allium (*Allium* spp.), narcissus (*Narcissus* spp.) and snowdrops (*Galanthus* spp.). A limited proportion of UK native species is included, notably bugle (*Ajuga reptans*), tufted hair grass (*Deschampsia cespitosa*), grey sedge (*Carex divulsa*), and bird cherry (*Prunus padus*), which provide some native character within the scheme. Overall, the planting is ornamental in nature and designed to deliver visual interest and seasonal variation, with relatively limited provision of native species that would more strongly support local biodiversity.
Planting Type 02 Rain garden – herbaceous, ornamental grass and shrub planting	Rain garden	This planting type is a rain garden which is a bioretention system to manage surface water run-off, temporarily store water and improve water quality through filtration by soils and vegetation.
Planting Type 03 Existing rain garden	Rain garden	This planting type represents the pre-existing rain garden which was created under a separate application but exists within the site and is going to be retained as part of the proposals.

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Table 3-4 Post-development habitat creation value

Habitat type	Area (ha)	Distinctiveness	Condition	Strategic significance multiplier	Final time to target multiplier	Difficulty of creation & restoration multiplier	Post-development units
Developed land; sealed surface	0.27	V. Low	N/A	1.15	1	1	0.00
Urban tree	0.0204	Medium	Moderate	1.15	0.382	1	0.07
Introduced shrub	0.02	Low	Poor	1.15	0.965	1	0.01
Rain garden	0.0026	Low	Poor	1.15	0.965	1	0.04
						Total:	**0.12**

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3.2.3 Summary of post-development biodiversity value

The habitat units created on the site, including the pre-existing rain garden produces a post-development biodiversity value of 0.12 biodiversity units.

Through the Biodiversity Metric calculations, the proposed development is considered likely to result in a **1224.82**% net gain in habitat units as summarised in Table 3-5.

Table 3-5 Change in habitat units

Post-Development Habitat Units		Pre-Development Habitat Units		Change in Habitat Units
0.12	minus	0.01	=	0.11

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4 Conclusion

The BNG assessment indicates that the proposed development achieves a **1224.82%** net gain in habitat units. The overall net gain delivered is substantial, however, the trading rules are not fully satisfied, as the baseline bramble scrub is classified as medium distinctiveness, and no habitats of equivalent or higher distinctiveness are proposed to replace it within the Poulton site.

Furthermore, the site formed part of the wider Mayfield development, within which the loss of bramble scrub and modified grassland has already been addressed. These losses and associated compensation measures are detailed within the Update Ecology Strategy with Biodiversity Net Gain – Phase 1 Technical Note (Buro Happold, 2023).

The wider Mayfield scheme has delivered significant ecological enhancements, including:

- River edge modifications and associated habitat improvements
- Creation of wildflower meadows and rain gardens
- De-culverting works
- Tree planting, green roofs, and structural planting

At the application site itself, the existing rain garden created as part of the Republic boundary will be retained, alongside the planting of five semi-mature trees and the creation of additional shrub planting and rain gardens.

In this context, it is considered that both the site and the wider Mayfield development have already delivered substantial biodiversity net gains, including a surplus of habitats of the same or functionally equivalent type to those required under the trading rules. As such, it is proposed that, through a bespoke agreement with the local authority, the trading rules can be considered to be satisfied by taking into account the wider Mayfield development as a whole. This approach recognises that the necessary habitat provision has effectively already been achieved at a development-wide scale. Requiring further amendments to the site-level landscape proposals at this stage, solely to adhere to the strict application of the trading rules, would therefore be disproportionate.

Habitats created on the site should be managed for at least 30 years post development to satisfy the conditions for BNG in the Environment Act 2021, as well as best practice guidelines. This should be secured through a Landscape and Ecological Management Plan (LEMP) and Habitat Management and Monitoring Plan (HMMP) as a planning condition. The management will be adapted based on monitoring results to ensure the best desired outcomes are achieved.

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Appendix A Planning policy and legislation

A.1 National legislation and planning policy

A.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 of February 2024, it is a mandatory requirement for all developments to deliver a 10% net gain for biodiversity using a measured approved metric approach.

A.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

A.2 Regional Planning Policy

A.2.1 Greater Manchester Local Nature Recovery Strategy

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Under the Environment Act 2021, Local Nature Recovery Strategies are intended to play a central role in guiding the delivery of Biodiversity Net Gain (BNG). The Greater Manchester LNRS specifically informs the application of the strategic significance multiplier within the Statutory Biodiversity Metric.

In this context:

- Habitats located within LNRS priority areas are typically assigned higher strategic significance, increasing their biodiversity unit value.
- Losses within these areas may result in greater compensation requirements.
- Conversely, habitat creation or enhancement aligned with LNRS priorities can deliver increased biodiversity units, supporting more efficient achievement of net gain targets.

The LNRS therefore ensures that BNG delivers not just quantitative gains, but strategically targeted outcomes that contribute to a coherent ecological network at a landscape scale.

A.2.2 Greater Manchester Resilience Strategy 2021 – 2031

The Greater Manchester strategy 2021 – 2031 sets out a route, over the next decade, to deliver a vision for the benefit of people, places and the planet. A focus of this strategy relates to creating a greener greater Manchester by responding to the climate emergency and recognising the role of the natural environment and utilizing nature-based solutions to reduce flood risk or creating better green spaces for nature, biodiversity and people.

A.2.3 Greater Manchester Resilience Strategy 2020 – 2030

This Strategy sets out a vision for a resilient Greater Manchester. It describes five priority areas to guide work through to 2030 and sets out key themes within these priorities. The Strategy will be accompanied by an action plan, reviewed regularly to ensure the strategy is on track. Priority 4, Place, includes protecting and promoting the resilience value of the natural environment through tree planting, creating habitats for wildlife and enabling greater biodiversity.

A.2.4 Places for Everyone (Adopted 2024)

Places for Everyone (PfE) is the statutory joint development plan for nine Greater Manchester districts, setting out how the city region will grow and develop up to 2039. It replaces the previous draft Greater Manchester Spatial Framework (GMSF).

PfE places a strong emphasis on the environment, aiming to protect and enhance Greater Manchester's natural assets and deliver measurable improvements in biodiversity. The plan aligns with the UK's 25 Year Environment Plan and the Environment Act 2021, requiring developments to achieve at least 10% Biodiversity Net Gain (BNG).

Key principles include:

- Applying the mitigation hierarchy (avoid, minimise, mitigate, compensate, offset).
- Protecting and improving existing habitats, creating new habitats, and strengthening ecological connectivity.
- Using the Defra biodiversity metric as the basis for calculating net gain, with a locally specific Greater Manchester metric to follow as supplementary guidance.

Relevant PfE policies:

- JP-G 9 – Green Infrastructure and Ecological Networks: Safeguards and enhances green infrastructure to support biodiversity and climate resilience.

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- JP-G 10 – Biodiversity and Geodiversity Net Gain: Requires major net gains in biodiversity through habitat protection, creation, and connectivity improvements.
- Green Factor Guidance: Sets expectations for on-site green infrastructure provision in new developments to meet occupant needs and contribute to the wider network.
- PfE ensures that biodiversity and green infrastructure are integral to development planning, supporting Greater Manchester's ambition to become a greener, more resilient city region.

5.1 Local planning policy

A.2.5 Manchester Core Strategy (Adopted 2012)

Manchester's Core Strategy is the principal planning document guiding development in the city. It embeds environmental sustainability and biodiversity protection into spatial planning. Key policies include:

Policy EN9 – Green Infrastructure: Requires development to protect and enhance green infrastructure, ensuring connectivity between habitats and access for people.

Policy EN15 – Biodiversity and Geological Conservation: Seeks to conserve and enhance biodiversity, protect designated sites, and integrate habitat creation into new developments.
The Core Strategy aligns with national planning policy and underpins Manchester's ambition to deliver a greener, more resilient city through habitat protection and enhancement.

A.2.6 Our Manchester Strategy – Forward to 2025

This citywide vision sets out Manchester's ambition to be in the "top flight of world cities" by 2025, with sustainability and inclusivity at its heart. Environmental priorities include:

- Moving towards a zero-carbon future by improving energy efficiency and transport.
- Protecting and enhancing parks and green spaces for health, recreation, and biodiversity.
- Encouraging community involvement in climate action and nature recovery.
  The strategy emphasises partnership working and a "greener future" as a core pillar of Manchester's growth.

A.2.7 A Green and Blue Infrastructure Strategy for Manchester

This strategy recognises green and blue spaces as a "life support system" for the city, providing health, climate resilience, and biodiversity benefits. Key objectives:

- Protect and Enhance GI Assets: Parks, rivers, canals, woodlands, and wetlands.
- Connectivity: Create a linked network of green and blue corridors across the city.
- Multi-Functionality: Deliver spaces that support wildlife, recreation, flood management, and carbon sequestration.

The strategy was refreshed in 2022 with an implementation plan and is considered a UK best-practice exemplar for urban green infrastructure planning.

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Appendix B Biodiversity net gain calculations

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

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