Land at Amberley Drive,

Wythenshawe

Biodiversity Net Gain Assessment

2024

Client	Wythenshawe Community Housing Group
Project Title	Land at Amberley Drive, Wythenshawe
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Executive Summary

Development Details

The client is proposing development at Land at Amberley Drive, Wythenshawe, Greater Manchester, hereafter referred to as the 'site'.

This report describes the results of a Biodiversity Net Gain (BNG) assessment for the proposed development. Recommendations are provided so that the development is compliant with BNG policy and legislation.

Biodiversity Impact Assessment

The baseline habitats on site provide 0.88 habitat units. The development proposals achieve 0.14 habitat units. This represents a net loss of -0.44 habitat units (-84.12%).

To mitigate for the loss, an off-site mitigation plot adjacent to the site will be enhanced from a baseline of 3.38 habitat units to a post-intervention 3.88 habitat units, resulting in a net gain of 0.50 habitat units (14.88%). When combined with the onsite development, this will result in a total net loss of -0.23 in habitat units (-26.71%).

Outcomes

Should the proposed off-site mitigation be carried out, the proposed development is predicted to result in a net loss of **0.23 habitat units (-26.71%)**. A Habitat Management and Monitoring Plan detailing the timing and responsibility for delivering the creation, maintenance, and monitoring of the proposed habitats will likely be provided as a pre-commencement planning condition.

In its current form, it is unlikely the proposed development or offsite mitigation plot can be enhanced further to achieve the required habitat units. In order to achieve the required 10% Biodiversity Net Gain, an additional **0.32 habitat units** are required. It is advised that compensation options be explored, through the purchase of biodiversity units.

1. Introduction

1.1 Project Brief

1.1.1 Rachel Hacking Ecology Limited (RHE) was commissioned in 2024 by Wythenshawe Community Housing Group to carry out a Biodiversity Net Gain (BNG) assessment of land off Amberley Drive, Wythenshawe (the 'site'). The site is located at O.S. grid reference: SJ 81157 87940 (see Figure 1).

1.1.2 Following this assessment, RHE was subsequently commissioned to undertake a Biodiversity Impact Assessment (BIA) of the land adjacent to the site (see Figure 1) for off-site BNG mitigation.

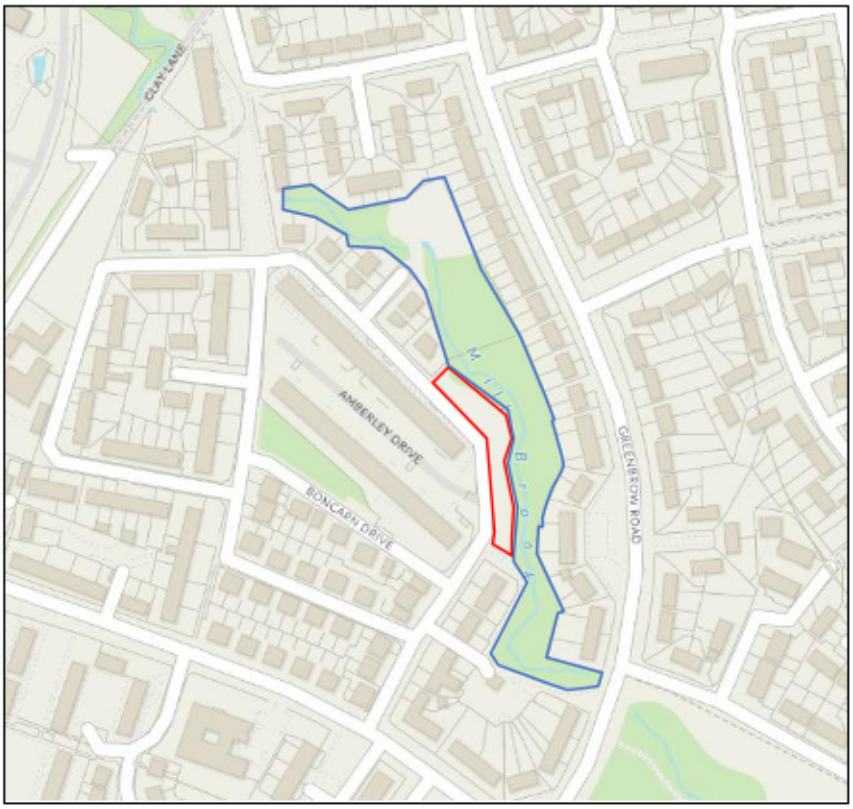


Figure 1. Map showing the location of the site (red line) and offsite mitigation site (blue line)

1.1.3 The site currently comprises poor semi-improved grassland, tall ruderal herb, scattered trees and scrub, amenity grassland and continuous scrub. The site is mostly surrounded by residential development. To the east lies greenspace, comprising Mill Brook and woodland.

Description of Development

1.1.4 The site will be the subject of a planning application for the construction of eight houses.

Relevant Planning History

1.1.5 Rachel Hacking Ecology carried out an Extended Phase 1 Habitat Survey of the site, and a wider area, in 2021[1], upon which this BNG assessment is based.

1.2 Scope of Work

1.2.1 The Client commissioned Rachel Hacking Ecology to undertake a BNG assessment to quantify the predicted changes in habitats resulting from the proposed development.

1.3 Site Visit Information

Surveyor Details

1.3.1 Ben Crossthwaite (Senior Ecologist) visited the site on 20th October 2021 to assess the habitats within the red line boundary. Ben has experience of undertaking similar surveys.

1.3.2 Joel Crossthwaite (Junior Ecologist) revisited the site on 15th October 2024 to survey the habitats within the blue line boundary.

[1] Extended Phase 1 Habitat Survey and Daytime Bat Survey, Land off Amberley Drive, Wythenshawe, Manchester - 2022 - REV.A

2. Methods

2.1 Biodiversity Net Gain

2.1.1 During the site walkover the ecological condition of each habitat was assessed in accordance with the Defra (2024) guidelines[2]. Habitat types recorded and mapped during the field survey were converted from the JNCC system to the UK Habitat Classification system[3].

2.1.2 Habitat data including type, area (or length), condition and strategic location were uploaded to the Defra Statutory Biodiversity Metric Calculator spreadsheet to determine the baseline value of the site. The extent of any habitats to be retained or enhanced was also entered into baseline worksheets.

2.1.3 The post-development masterplan was interrogated to determine areas of hard standing, buildings, and associated infrastructure. New, retained and enhanced habitats were classified and allocated a target condition, based on habitat type, location and management input. This information was uploaded to the metric spreadsheet to obtain a post-development value.

2.1.4 The pre- and post-development values were compared to determine whether the yield of biodiversity units achieved a deficit or gain.

2.2 Mitigation Hierarchy

2.2.1 Mitigation measures should be embedded within the masterplan design and planning application process. This process from proposal to implementation needs to consider the 'mitigation hierarchy' of avoid, reduce, compensate, and enhance:

- Aim to avoid negative effects through the design process.
- Mitigate if negative effects cannot be avoided.
- Use compensation measures to offset residual impacts.
- Identify and implement opportunities to enhance biodiversity.

[2] The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf (publishing.service.gov.uk)

[3] Butcher, B., Carey, P., et al. (2020). UK Habitat Classification – Habitat Definitions V1.1. at http://UKhab.org

3. Results

3.1 Baseline Habitats (Onsite)

3.1.1 The habitat survey is contained in Appendix 2. For further details, target notes and photographs are contained in the original ecological appraisal, as referenced above. Please refer to the Statutory BNG Metric [4] and the Statutory habitat condition assessment spreadsheet[5].

3.2 Area Habitats (Onsite)

3.2.1 The area habitats baseline score is calculated to be 0.88 habitat units.

Grassland; Modified Grassland

3.2.2 The dominant habitat on site is amenity grassland, extending to 0.095ha. The grassland species assemblage is of low diversity, dominated by Perennial Rye-grass *Lolium perenne*. Herbaceous species include Creeping Buttercup *Ranunculus repens*, Broad-leaved Dock *Rumex obtusifolius*, Dandelion *Taraxacum officinale* agg., Ribwort Plantain *Plantago lanceolata*, Red Clover *Trifolium pratense* and White Clover *Trifolium repens*. This habitat achieves 0.19 habitat units.

Heathland and shrub; Mixed Scrub

3.2.3 This habitat extends to 0.031ha. Abundant species include Blackthorn *Prunus spinosa*, Bramble *Rubus fruticosus agg.*, Pedunculate Oak *Quercus robur*, Hazel *Corylus avellana*, Rosebay Willowherb *Chamaenerion angustifolium* and Elder *Sambucus nigra*. This habitat achieves 0.25 habitat units.

Sparsely vegetated land; Tall Forbs

3.2.4 Tall, ruderal herb vegetation extends to 0.036ha. Abundant species are Bramble, Common Nettle *Urtica dioica*, Cock's-foot *Dactylis glomerata*, Raspberry *Rubus idaeus*, Hogweed *Heracleum sphondylium*, Cleavers *Galium aparine*, Rosebay Willowherb *Chamaenerion angustifolium*, Ivy *Hedera helix* and Atlantic Ivy *Hedera helix spp. Hibernica*. This habitat achieves 0.14 habitat units.

Individual trees

3.2.5 Individual trees are scattered across the site (T23 and G5). For consistency, all tree numbers correspond to those in the Arboricultural Impact Assessment (AIA)[6].

3.2.6 Species include Oak *Quercus robur*, Wild Cherry *Prunus avium* and Willow *Salix spp.*

[4] RHE.2783 Amberley Drive, Wythenshawe - Statutory BNG Metric

[5] RHE.2783 Amberley Drive, Wythenshawe - Statutory Condition Assessments

[6] ACS Consulting (2023). Arboricultural Report of Amberley Drive, Wythenshawe

3.2.7 Individual trees are of medium distinctiveness and low strategic significance. These trees have been assessed using the Statutory Biodiversity Condition Assessment sheet 9B INDIVIDUAL TREES, and range between moderate and good condition.

3.2.8 The trees of a moderate condition cover an area of 0.0122ha and deliver 0.10 habitat units.

3.2.9 The trees of a good condition cover an area of 0.0163ha and deliver 0.20 habitat units.

3.3 Post Development Created Habitats (Onsite)

3.3.1 The development proposals achieve 0.14habitat units. None of the existing habitats will be retained as part of the development. Please refer to the Statutory BNG Metric.

Urban; Developed Land; Sealed Surface

3.3.2 Buildings, driveways, paths and hardstanding will form the majority of the site and these extend to a total of 0.0867ha. This is a habitat of very low distinctiveness and low strategic significance. Target condition is not applicable. Developed land; sealed surface scores zero habitat units.

Urban; Vegetated Garden

3.3.3 The external spaces to the rear and sides of the properties will be managed as private gardens. This habitat will extend to a total of 0.072ha. Target condition is not applicable. Vegetated garden scores 0.14 habitat units.

3.4 Baseline Habitats (Off-site)

3.4.1 The habitat survey is contained in Appendix 5. Target notes and photographs relating to each habitat are contained in Appendix 6. Please refer to the Statutory BNG Metric[7] and the Statutory habitat condition assessment spreadsheet[8].

3.5 Area Habitats (Off-site)

3.5.1 The area habitats baseline score is calculated to be 3.38 habitat units.

Grassland; Modified Grassland

3.5.2 This habitat extends 0.046ha. Dominant species include Perennial Rye-grass, Yorkshire Fog *Holcus Lanatus*, Red Fescue *Festuca rubra*, Nettle, Wood Avens *Geum urbanum* and Herb-Robert *Geranium robertianum*. This habitat achieves 0.09 habitat units.

Grassland; Traditional Orchard

[7] RHE.2783 Amberley Drive, Wythenshawe - Statutory BNG Metric – Inc. Off-site mitigation

[8] RHE.2783 Amberley Drive, Wythenshawe - Statutory Condition Assessments – Off site

3.5.3 This habitat extends 0.111ha. Fruit bearing species include Apple *Malus pumila*, Wild Cherry *Prunus avium* and Fig *Ficus carica*. Additional species include Perennial Rye-grass, Yorkshire Fog, Red Fescue, Cock's-foot *Dactylis glomerata*, Pedunculate Oak *Quercus robur* and Broad-leaved Dock. This habitat achieves 1.33 habitat units.

Heathland and Shrub; Bramble Scrub

3.5.4 This habitat extends to 0.08ha. Bramble is dominant throughout these habitats. Additional species include Nettle, Willowherb and Bindweed *Calystegia* sp. This habitat achieves 0.32 habitat units.

Urban; Bare Ground

3.5.5 This habitat consists of a small area located at what used to be the entrance to the site. At one time it appears to have been a pathway but has since overgrown with a combination of mosses and grasses. This habitat extends to 0.004ha. This is a habitat of low distinctiveness and low strategic significance. This habitat achieves 0.01 habitat units.

Woodland and Forest; Other Woodland; Broadleaved

3.5.6 This is the dominant off-site habitat, extending to 0.203ha. Species include Oak *Quercus* sp., Hazel *Corylus avellana*, Ash *Fraxinus excelsior*, Common Lime *Tilia x europaea*, Wild Cherry, Sycamore *Acer pseudoplatanus*, Sweet Chestnut *Castanea sativa* and Elder *Sambucus nigra*. This habitat achieves 1.62 habitat units.

3.6 Post Development Created Habitats (Off-site)

Heathland and shrub; Mixed scrub

3.6.1 The proposed mitigation plan will replace the modified grassland and bare ground habitats with mixed scrub. This new habitat will extend to0.05ha and achieve 0.33 habitat units.

3.7 Post Development Enhanced Habitats (Off-site)

3.7.1 The proposed mitigation plan will include the enhancement of the Bramble scrub to mixed scrub. Please refer to the Statutory BNG Metric.

Heathland and shrub; Mixed scrub

3.7.2 This habitat will extend 0.08ha, achieving 0.59 habitat units.

4. Assessment

4.1.1 A summary extract of the BNG assessment can be seen in Appendix 4.

4.1.2 Baseline habitats score **0.88 habitat units**. Post development habitats score **0.14 habitat units**. The development will result in a net loss of **-0.74 habitat units (-84.12%)**.

Off-site mitigation

4.1.3 An area adjacent to the proposed development site has been identified for off-site mitigation (see Appendix 5).

4.1.4 Baseline habitats on the mitigation site score **3.38 habitat units**. Post-intervention habitats score **3.88 habitat units**.

4.1.5 With off-site mitigation, the development will result in an overall net loss of **-0.23 habitat units (-26.71%)**.

5. Recommendations

5.1.1 The cost of compensation can be reduced with the enhancement of the offsite mitigation site. This will require the creating of mixed scrub throughout the site. It is recommended a variety of native scrub species should be planted evenly throughout the outlined areas.

5.1.2 The BNG mitigation will be secured via a 30-year Habitat Management & Monitoring Plan (HMMP), which can be imposed via a suitably worded planning condition. There may also be a requirement to secure the BNG via a s106 agreement.

5.1.3 In order to achieve the required 10% Biodiversity Net Gain, an additional **0.32** habitat units are required. Due to trading rules, all lost trees must be replaced with habitats of a similar distinctiveness to ensure like-for-like compensation. Given that the remainder of the offsite mitigation plot consists primarily of woodland, the potential for further enhancements within this area is limited. As such, alternative options, such as the purchase of biodiversity units, should be explored to meet the outstanding requirements.

Appendix 1: Planning Policy & Legislation

National Policy

The National Planning Policy Framework (NPPF 2023) describes the Government's planning policy for England and how it should be applied. Within this framework, the requirements in relation to biodiversity are included within several policies. The two most relevant to individual planning decisions are Paragraphs 180 and 186, shown below:

- 180. Planning policies and decisions should contribute to and enhance the natural and local environment by:
    a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
    b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
    c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
    d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
    e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
    f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 186. 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.

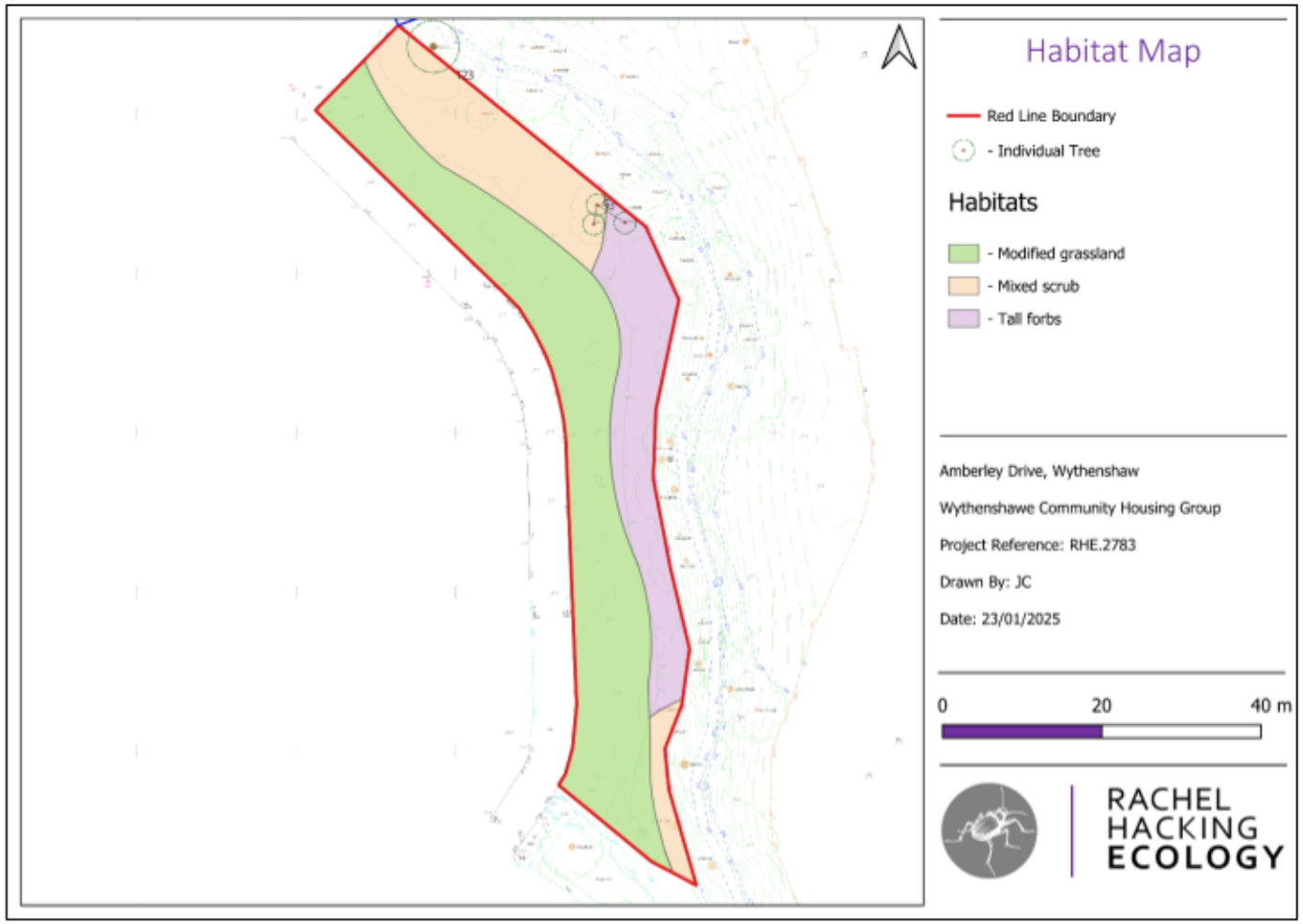
Legislation

The Environment Act 2023 makes it mandatory for housing and development, subject to some narrow exemptions, to achieve at least a 10% net gain in value for biodiversity – a requirement that habitats for wildlife must be left in a measurably better state than before the development. Developers must submit a 'biodiversity gain plan' alongside usual planning application documents. The local authority must assess whether the 10% net gain requirement is met in order to approve the biodiversity gain plan.

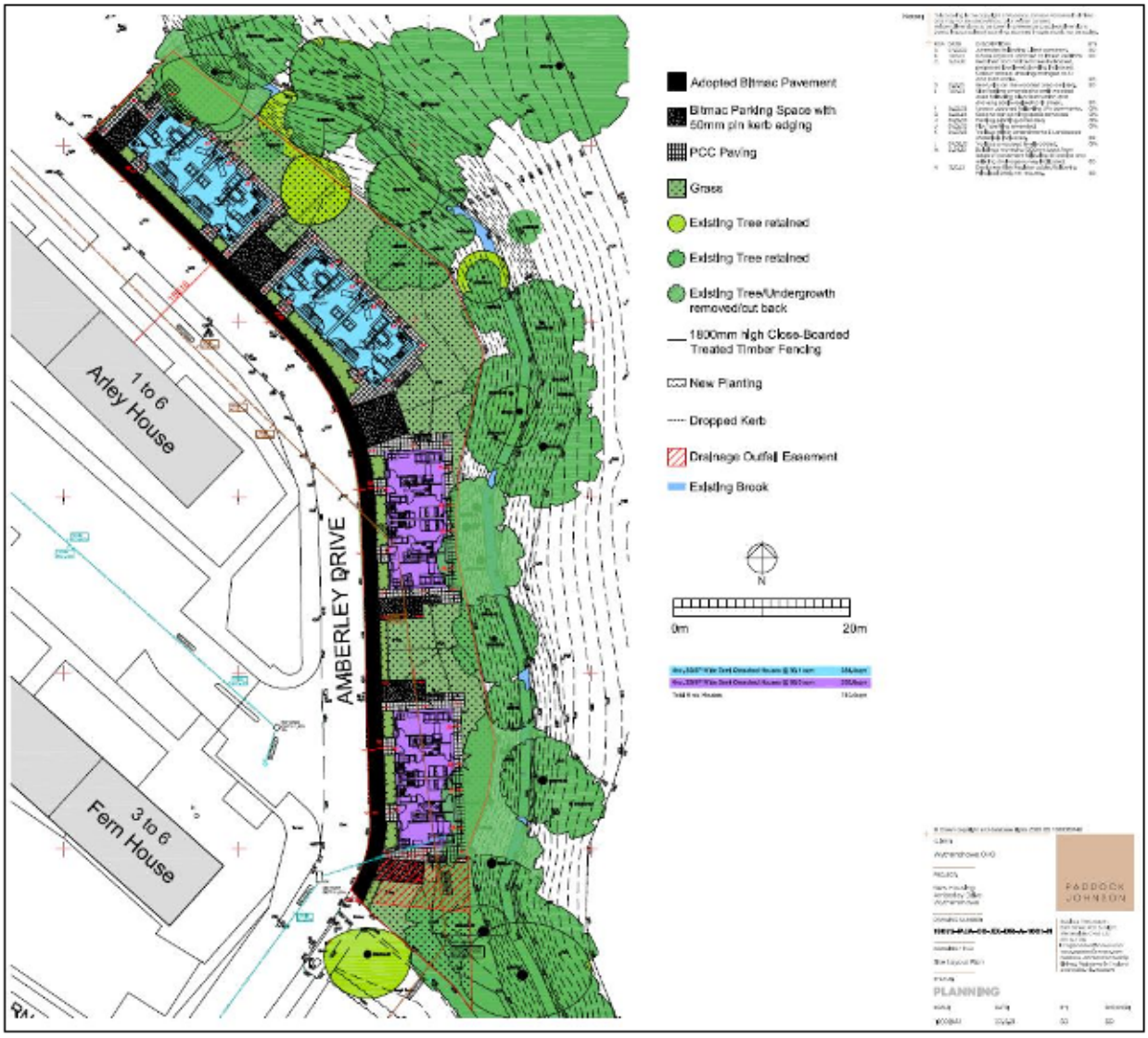
The Environment Act 2023 strengthens the duty on public authorities (NERC Act, 2006) to have regard to the conservation of biodiversity.

The Environment Act 2023 amends the Wildlife and Countryside Act 1981 to introduce an additional purpose for granting a protected species licence in relation to development, 'for reasons of overriding public interest', and two additional tests for the granting of such licences: that there is 'no other satisfactory solution' and that granting the licence is 'not detrimental to the survival of any the population of the species concerned'. These changes will reduce the scope for unlicensed activities to provide clear safeguards before licences can be granted, providing legal certainty and clarity to developers about their environmental obligations.

Appendix 2: On site Baseline Habitat Map



Appendix 3: Proposal Plan

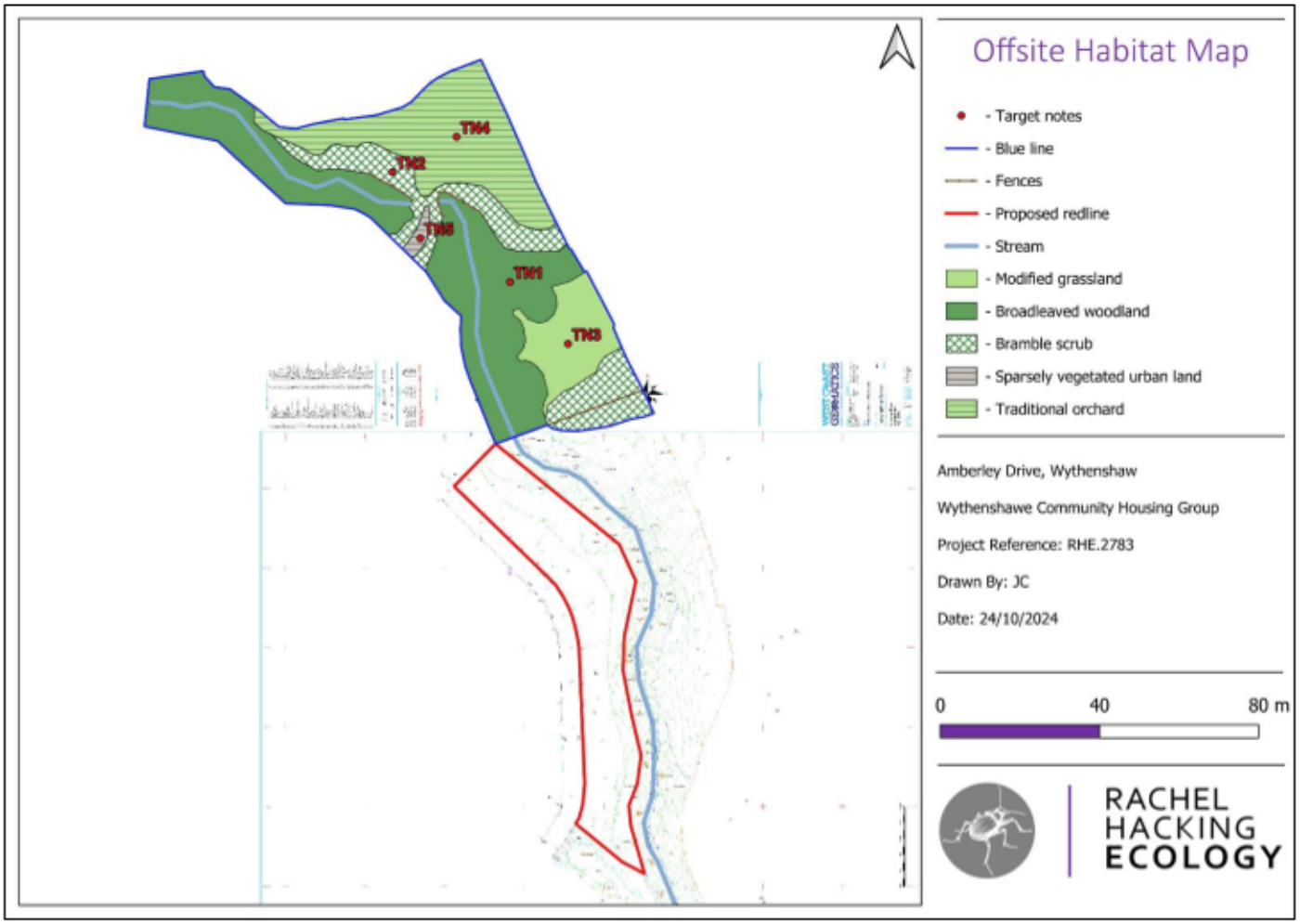


Appendix 4: Headline Results

FINAL RESULTS			
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.23	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-26.71%	Total net gain achieved is less than target set ▲
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
Trading rules satisfied?	No - Check Trading Summaries ▲		

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	0.88	0.96	0.32	
Hedgerow units	10.00%	0.00	0.00	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

Appendix 5: Off-site Mitigation Baseline Habitat Map



Appendix 6: Off-site Mitigation Target Notes

Target Notes		
Reference No.	Description	Photograph
TN1	Woodland and forest; Other woodland; Broadleaved	

TN2	Heathland and shrub; Bramble scrub	

TN3	Grassland; Modified grassland	

TN4	Grassland; Traditional orchard	

TN5	Urban; Bare ground	