



Delivery of Off-Site Biodiversity Net Gain in Greater Manchester

A Scoping Study

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TEP

Genesis Centre,
Birchwood Science Park,
Warrington,
WA3 7BH
Tel: 01925 844004
Email: tep@tep.uk.com

Offices in Warrington, Market Harborough, Gateshead, London and Cornwall

PLANNING | DESIGN | ENVIRONMENT

www.tep.uk.com

Executive Summary

1. The Environment Partnership (TEP) was commissioned by Greater Manchester Combined Authority to undertake a Scoping Study for the delivery of offsite Biodiversity Net Gain (BNG) in Greater Manchester. Delivery of the Off-Site Biodiversity Net Gain in Greater Manchester Scoping Study was made possible with the support of EU Life IP funding. Project number: LIFE14 IPE/UK/027
2. The scope of the Study was to undertake a gap analysis through a series of stakeholder events to identify what support is needed, when, and by whom to deliver biodiversity net gain offsetting sites in Greater Manchester. The study consisted existing and emerging national guidance on offsetting and best practice from elsewhere in the UK, and the potential for sites to be brought forward by the public, private and third sectors.
3. The Study found that few offsite solutions have been secured to date in Greater Manchester in the absence local plans or policies requiring net gain. The solutions available and how to secure them are poorly understood, and there is limited capacity currently within the Local Authorities and GMEU to develop the infrastructure required to scale up to deliver 10% net gain on all planning applications.
4. It was acknowledged by key partners during the study that a national BNG model and process was being developed by Government which will consider the interdependencies with other environmental initiatives such as Environmental Land Management Schemes (ELMS). The Study therefore focussed on the key steps and actions required to develop an interim process for Greater Manchester to transition towards the national model.
5. An Implementation Plan has been produced with actions and outcomes prioritised into immediate, short and medium term timeframes. The project Steering Group has been integral in developing the Plan, with member organisations agreeing to lead on the immediate term actions over the next six months. The Steering Group will form the initial membership of the

Biodiversity Net Gain Implementation Team (BNGIT) who will be tasked with delivering the Plan.

6. One of the immediate term actions is the need to undertake a need and supply assessment to establish the number and type of biodiversity units likely to be required over the next five years within the region, replicating work already underway as part of the Natural Environment Investment Readiness Fund pilot and in the private sector. The draft Local Nature Recovery Strategy will need to be used to search for areas with the potential to deliver the best outcomes for biodiversity. Sites within these areas will be identified, starting with Local Authority land, and criteria will need to be developed to screen potential sites allowing resource to be focussed on sites likely to be able to offer units, helping to realise the ambition of the LNRS. These are identified as the best endeavours, and in some cases may be subject to additional funding or interventions to progress regionally.
7. The cost to create, manage and monitor habitats is fundamental to the process and a transparent and robust approach to valuing units will need to be developed by the Wildlife Trust.
8. Work to launch the Greater Manchester Environment Fund is inextricably linked to the Implementation Plan and there will be opportunities to share learning between work streams and to Local Authorities.
9. Organisations across sectors and across the region all have a role to play to ensure Greater Manchester continues to progress ahead of time to ensure the region is ready for implementation.

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1.0 Introduction

1.1 Biodiversity Net Gain in Greater Manchester

Biodiversity Net Gain is an approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity it encourages developers to provide an increase in appropriate natural habitat and ecological features over and above that being affected. It is hoped that the current loss of biodiversity through development will be halted and ecological networks can be restored. An increase in appropriate habitat is provided by habitat creation, restoration, or enhancement accompanied by long term management. Changes in biodiversity values (losses or gains) brought about by development or changes in land use can be measured using a biodiversity metric.

The Environment Bill is currently passing through Parliament, and includes a mandatory 10% BNG for all development under the Town and Country Planning Act 1990 and Nationally Significant Infrastructure Projects (NSIPs). Certain councils in England have published guidance or Supplementary Planning Documents (SPDs) in anticipation of these new rules. However, **at** the time the study was undertaken, none of the ten Local Authorities within Greater Manchester had adopted local plans, policies or SPDs in place requiring a specific level of net gain. Few planning applications are submitted with a biodiversity metric, however Greater Manchester Ecology Unit (GMEU) requests metrics for larger strategic sites.

Salford Council's draft Local Plan and "Places for Everyone": the replacement of the Greater Manchester Spatial Framework for Authorities in Bury, Salford, Manchester, Trafford, Oldham, Rochdale, Tameside, Wigan and Bolton are both anticipated to mandate 10% BNG across the city region in mid-2022.

In the event that the level of BNG required by either local or national policy cannot be delivered within the development boundary, an offsite solution is required. The overall need for offsite solutions is currently unknown within the city region, however Finance Earth have produced initial estimates using a number of assumptions which

formed part of the GMEF Investment Strategy and subsequent Natural Environment Investment Readiness Fund pilot. Based on an approach used in Salford which estimated £300k annual income for offsite BNG attracting £1m investment to the area, this was scaled up to provide an initial Greater Manchester estimate of £5m-£7m annual offsite BNG income reflecting a sizeable habitat bank investment opportunity. The current process to find and secure sites is reactive, resource intensive for GMEU and the relevant authorities, and not currently scalable.

1.2 Study Scope

The Environment Partnership (TEP) was commissioned by Greater Manchester Combined Authority to undertake a Scoping Study for the delivery of offsite Biodiversity Net Gain (BNG) in Greater Manchester.

The scope of the study was to undertake a gap analysis through a series of stakeholder events to identify what support is needed, when, and by whom to deliver biodiversity net gain offsetting sites in Greater Manchester. The study needed to have regard to existing and emerging national guidance on offsetting and best practice from elsewhere in the UK, and was to consider the potential for sites to be brought forward by the public, private and third sectors.

The key outputs of the study are:

- Scoping Study and Gap Analysis (Section 3.0, and Theory of Change at Section 7.0)
- Process map identifying key stages involved in delivering/supporting the delivery of sites (Section 5.0)
- Timelines including key milestones (Section 6.0)
- Co-ordinated programme of activities to include a range of technical and capacity support (Implementation Plan – Section 4.0)
- Options to support delivery and key leads identified (Implementation Plan – Section 4.0)

2.0 Background and Approach to the Study

2.1 Vision

The vision for offsite BNG in Greater Manchester is:

“A network of sites and a flexible framework of delivery options is established to support the delivery of BNG offsite requirements in Greater Manchester”.

2.2 Principles

The principles for offsite BNG in Greater Manchester are:

- Follow the mitigation hierarchy
- Use the Local Nature Recovery Strategy (LNRS) to prioritise offset locations
- Provide certainty of delivery
- Local benefits (i.e. offset locations as close as possible to losses)
- Ensure appropriate oversight of delivery in accordance with guidance and standards
- Ensure appropriate monitoring and reporting
- Deliver integrated and strategic environmental outcomes

A schematic of the offsite BNG process in Greater Manchester is shown in Figure 1 with further narrative on the flexible framework of options below.

Off-site Net Gain Process

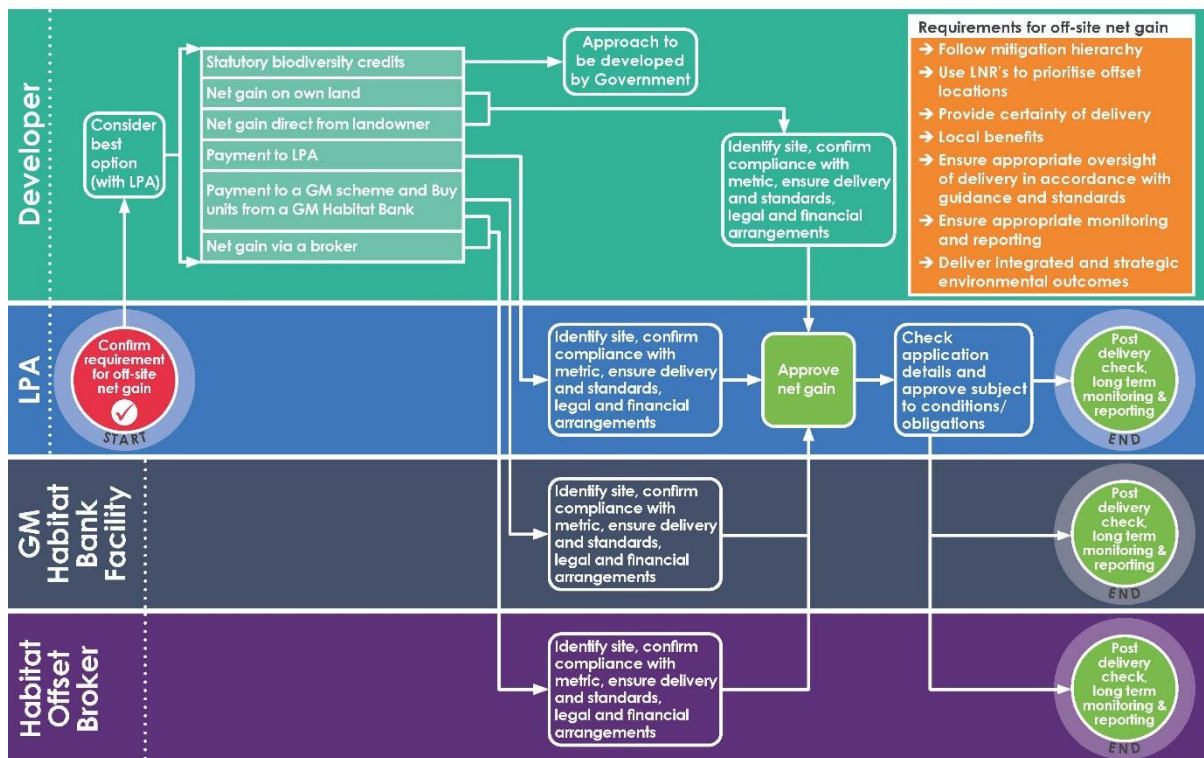


Figure 1: Offsite BNG Process in Greater Manchester

The six current and future options for offsite BNG are discussed below. These options are not mutually exclusive, for example an element of net gain could be delivered on a developer's own land with a shortfall of units delivered by a broker or habitat bank. The options are not currently well understood and the underpinning processes are not defined, so the identification of a suitable offsite solution is currently resource-heavy for developers, LPAs and GMEU. The options below are not shown in any particular order.

<p>Statutory Biodiversity Credits</p>	<ul style="list-style-type: none"> • Approach to be developed by the Government as part of the Environment Bill • Last resort where all other options have been exhausted • Risk of biodiversity credits flowing out of the region • Not currently available
<p>Net Gain on Own Land</p>	<ul style="list-style-type: none"> • Net gain is provided within the red line of the development, or within land owned by the developer elsewhere • Simplest option to secure and deliver • Developer responsible for funding baseline assessments, drafting management plans, undertaking monitoring etc
<p>Net Gain Direct from Landowner</p>	<ul style="list-style-type: none"> • Net gain is provided on land owned by someone else • Requires early engagement and agreement with landowners • Developer responsible for funding baseline assessments of land, drafting management plans • Legal and financial agreements required to secure delivery and monitoring
<p>Payment to LPA</p>	<ul style="list-style-type: none"> • Developer agrees a financial contribution with the LPA to provide the net gain elsewhere within the District. • Typically secured by a S106 agreement, LPA take on liability • In the absence of available sites, funds can pool within LPA and net gain is not realised. This option may no longer be acceptable once net gain becomes mandatory.

Net Gain via a Broker

- Developer agrees a financial contribution with a broker to provide the net gain.
- Risk of biodiversity units flowing out of the region
- Limited number of brokers currently in operation so currently expensive

Buy Units from GM Habitat Bank

- Habitat Banks sell “units” of habitats already created to a developer to enable the net gain requirement to be met.
- No currently operational Habitat Banks in GM
- GM Environment Fund looking into Habitat Bank investment model

2.3 Study Methodology

The study involved the following six tasks:

Task 1: Inception

The online Inception Meeting saw the launch of the Study Steering Group (TEP, GMEU, Natural England (NE), GMCA and Lancashire Wildlife Trust (LWT).

The Inception Meeting was used to discuss and refine the methodology and approach with GMCA so that it aligned with the decision-making context. This allowed priorities to be set for particular focus areas of the research and how these accord with the most suitable methodological techniques.

An integral part of the Study was the review of existing and proposed natural environment initiatives and emerging guidance and policy relevant to the provision of offsite BNG within Greater Manchester and beyond. The Inception Meeting was used to review the scope, interdependencies and timelines of the most relevant initiatives and policy including:

- Greater Manchester BNG Delivery Model & Implementation Note;
- The GMCA BNG preparedness survey results;
- Greater Manchester 5-Year Environment Plan;
- Greater Manchester Nature Recovery Plan;
- Greater Manchester Environment Fund (expected Summer 2021);
- District-Level Licensing;
- Greater Manchester Local Nature Recovery Strategy (expected Summer 2021);
- NE/Salford Chat Moss Investment Pilot;
- Other offsite biodiversity unit providers;
- Local Planning Policy; and
- Parliamentary timeline for Royal Assent of the Environment Bill.
- British Standard - Process for designing and implementing BNG – BS8683 (expected Summer 2021)

As the Study was anticipated to be heavily reliant on regular and clear communication with Greater Manchester Local Authorities and a wide range of stakeholders, a log of key contacts was established alongside a communications plan and programme.

A Theory of Change was initiated for the Study after Inception, and was further developed during the tasks. The final Theory of Change is included as Section 7.0 of this report.

Task 2: Key Partner Engagement

Task 2 involved targeted interviews with a range of key partners. The information and initiatives reviewed in Task 1 were used to draft partner-specific agendas to inform each interview. The aim of the interviews was to build a picture of how offsite net gain is currently delivered procedurally and spatially within Greater Manchester and beyond, to focus on what processes and activities need to happen to implement offsite BNG in Greater Manchester and to identify pinch points, and resource and knowledge gaps. Detail on habitats and metrics was not discussed. Minutes of each interview were circulated to each organisation and GMCA for comment following the interview.

The organisations interviewed and broad themes for discussion are listed below:

Defra/Natural England:

- Expected changes, principles and rules associated with Biodiversity Metric 3.0;
- Proposals for secondary legislation following Environment Bill Assent (e.g. habitat bank site register and BNG plan);
- Environmental Net Gain (carbon, flood risk management);
- District-Level Licensing: lessons learnt, landowner negotiations, site selection/prioritisation rules and principles; and
- Local Nature Recovery Strategy Pilot.

GMEU:

- Role of GMEU now and into the future, capacity and resourcing;
- GMEU experience to date in securing offsite solutions;

- Current and future process.

GMCA:

- Links with the delivery of the Local Nature Recovery Strategy;
- Links with “Places for Everyone”: The plan of the nine Local Authorities leading from the draft GMSF; and
- GMCA’s role, funding and resourcing, next steps following Scoping Study.

Offset Providers and Investors: (Lancashire Wildlife Trust & Finance Earth):

- Investment Readiness Fund Bid: Chat Moss Pilot and investment strategy;
- Potential roles of LWT and Greater Manchester Environment Fund (GMEF);

BNG Exemplars (Warkwickshire County Council, Surrey Wildlife Trust, Trust for Oxfordshire):

- Learning from habitat bank practitioners; and
- Do’s and don’ts.

Greater Manchester Authorities (Bury & Salford):

- Recent progress;
- Local Plan and mandatory policy aspirations;
- Resourcing and support; and
- Existing schemes/banks and programme of delivery.

Private Interests and Landowners (Peel Land & Property, United Utilities, National Trust):

- Current schemes that have required or supplied BNG
- Strategic assessment of land for BNG; and
- Opportunities and challenges.

The main objective of the Key Partner Engagement was to inform the initial findings and recommendations in the Interim Report, and to develop discussion themes for the wider stakeholder events in Task 4.

Task 3: Interim Report

The Interim Report was discussed with the Steering Group in mid-April to input into planning for Natural Course Phase 4 based on the engagement and outputs from Tasks 1 and 2. The report summarised the findings of the Key Partner Engagement and informed the content for the Stakeholder Engagement Workshops. Draft process flow charts were developed for the processes and steps of identifying sites and bringing these forward to a Greater Manchester site register. A proposed timeline towards mandatory BNG was developed to show the short, medium and long term phases of transition and recommended actions identified from the interviews were incorporated into the timeline.

Task 4: Stakeholder Engagement Workshops

Stakeholder Engagement Workshops were hosted on the interactive whiteboard platform Miro with a broad audience of stakeholders across the city region.

Aims & Objectives

The aims of the workshops were to:

- provide attendees with an understanding of the timeline and key milestones for BNG in Greater Manchester;
- seek consensus on the collated information and the key gaps and opportunities;
- provide an opportunity to comment on and help develop draft processes and delivery options for offsite BNG; and
- encourage attendees to consider how their organisations can help implement offsite BNG in Greater Manchester.

Stakeholder Engagement Workshops were run for each stakeholder sector with the following representatives:

Workshop 1. Public Sector (30th April 2021):

- GMCA, GMEU, 10 Local Authorities, Natural England, Local Government Association, Environment Agency

Workshop 2. Third Sector Organisations (6th May 2021):

- Lancashire Wildlife Trust, Groundwork, City of Trees, Cheshire Wildlife Trust, Canal and Rivers Trust, Woodland Trust, Mersey Rivers Trust, Forestry Commission, and National Trust

Workshop 3. Private Interests and Landowners (12th May 2021):

- Peel Land and Property, United Utilities, Redrow, Bruntwood, Suez, National Farmers Union, Far East Consortium, and Manchester Airport Group

Each workshop had an agenda targeted to the relevant sector and focussed on the needs of attendees and how they can contribute to ensure the smooth operation of off-site net gain within the city region

Task 5: Options and Programme

Following the completion of the engagement tasks, a Draft Implementation Plan was developed to include a series of actions for implementation over the immediate (0-6 months), short (6-12 months) and medium terms (1-2 years). The Draft Implementation Plan also included the organisations or individuals likely to lead on the delivery of each action and an indicative assessment of the likely resource requirement. Actions for immediate implementation were prioritised at this stage, acknowledging the importance of a shared collaborative approach to deliver the plan in 2021.

Consultation with the Steering Group helped refine the Draft Implementation Plan. The final Implementation Plan was then combined with an updated timeline to create the Programme.

Task 6: Final Report

This report was produced to include a summary of engagement alongside the options and programme developed to implement BNG. It details what is required, why this is required, who needs to be involved, where the activities need to be delivered, how can they be delivered, and what resources are required.

A closure meeting was held with GMCA following the issue of the Final Report.

3.0 Interviews and Workshop Output Summary

3.1 Listening and Learning

A summary of the Key Partner Engagement interviews and Stakeholder Engagement Workshops is included below. Consistent views, especially on risks and opportunities, repeatedly emerged across the sectors during the interviews and these have been aggregated under cross cutting (sector-wide) and key steps (process) themes. Partner-specific responses are included with the minutes of each interview and, alongside the workshop outputs, these have been provided separately to GMCA.

CROSS CUTTING ACTIONS

Governance

Facilitating offsite BNG is a shared endeavour across organisations and there is a need for a co-ordinated approach across the sectors to realise the ambition. Whilst BNG is within the remit of some existing collaborative groups within Greater Manchester (e.g. Natural Capital Group, Planning Officers Group, and Development Managers Group), provision of offsite BNG requires actions by the public, private and third sectors. Thus a dedicated group to implement the study programme is required to keep up the momentum.

All the interviewees in Greater Manchester were aware of mandatory 10% BNG in the Environment Bill and the likelihood of this level of BNG leading to an increase in the need for offsite solutions. When this 10% level will be mandated locally (in Local Plans and/or via Places for Everyone) and the milestones leading up to national 10% net gain were less certain. The vast majority of cases looking for offsite solutions at present were those seeking to achieve no net loss, rather than net gain.

Very few biodiversity metrics are currently submitted alongside planning applications across Greater Manchester; these are either voluntarily submitted or are requested by GMEU for specific schemes, usually strategic development applications. In other regions, requiring biodiversity metrics on all major planning applications proved to be the “switch” that started the process in earnest, providing funding streams from development for additional staff to assess metrics and habitat management plans, issue grants for habitat assessments, and scheme administration.

In areas outside Greater Manchester where offsite BNG is already in operation, simple processes and a single point of contact/organisation to govern site selection and verification works best. All ten Greater Manchester Local Authorities currently fund GMEU to provide technical BNG advice on development management and strategy. GMEU would need additional funding to significantly expand its role to manage the process and assess an increased volume of metrics when BNG is mandatory. Ecological expertise within the Local Authorities is currently very limited as the resource is pooled within GMEU.

The roles and responsibilities of each organisation (developer, landowner, Local Authority, GMEU, offset broker) need to be clear. There are no defined processes or key steps for potential offset sites to come forwards and be registered and verified. GMCA’s Guidance for BNG in Greater Manchester¹ is a useful document providing advice on some of these areas, but it is not being enforced or publicised in advance of local policy. An approach is needed for developments that span Local Authority areas and also those that cross the Greater Manchester regional boundary.

The timing and type of financial transactions at various stages of the process is not clear, and needs to be in order to attract offset sites. This needs to intertwine with the planning processes as there may need to be different approaches for outline and full applications.

¹ GMCA Biodiversity Net Gain: Guidance for Greater Manchester, February 2021

There was widespread support for a Greater Manchester wide register of offset sites, and it was commented by GMEU that this would also be required for Local Authority reporting. The lack of a site register is considered to be a significant constraint to the current process.

Defra and Natural England will develop a national approach to registration following BNG becoming mandatory in 2023 including a national site register of BNG sites. Any regional approach will need to be flexible enough to transition to the England-wide approach.

Communications

The range of offsite solutions, what they involve and how to secure them is currently poorly understood across the sectors. The identification of offsite solutions is currently reactive and occurs when a biodiversity metric has been submitted, and is in net loss. GMEU and the relevant Local Authority are heavily involved in finding and securing offsite solutions, often at the planning application stage, however the options and solutions are not shared widely.

There is a need to ensure synergy of BNG with the new Environmental Land Management Schemes (ELMS): Sustainable Farming Incentive, Local Nature Recovery, and Landscape Recovery. Under these schemes, farmers and landowners may enter into agreements that will reward environmental land management. Land should not receive ELMS and BNG payments for the same outcomes.

Natural England commented that the protected species district-level licensing (DLL) work in the region is similar in needing to identify landowners in strategic locations for habitat creation. A review of process and documentation would be worthwhile.

Farmers will need certainty when it comes to BNG, and will need to know how it compares to other ecosystem services options. Farmers will also need to be clear on the risk and liabilities they are taking on since BNG time frames will likely span generations, and there could be conflict with tenancy agreements.

ELMS “test and trial” is underway to develop collaborative spatial prioritisation and management of ELMS delivery. There is likely to be competition for sources of finance and farmers will need to be able to understand the options and work out what is best for them. There will need to be clear communications aimed at the farming community and there is likely to be a strong desire for an “outreach service” to provide baseline habitat assessments. Cost per unit will need to be compelling for farmers to opt for BNG.

Trust for Oxfordshire Environment (TOE) and Warwickshire Council Council (WCC) both stressed the importance of a BNG “Champion”. This role is performed by an individual or organisation in a region who advocates the benefits of BNG widely. This builds confidence and trust and helps cross-sector networking; essential for BNG delivery in these regions.

Funding

Funding for BNG work (on and offsite) in Greater Manchester is predominantly provided by Service Level Agreements from the ten Local Authorities to GMEU for ecological support. A requirement for 10% net gain and an increase in the numbers of metrics being submitted would increase the workload of GMEU significantly which would require additional resource.

Specific commissions into studies have been assisted by funding from the Natural Environment Investment Readiness Fund (NEIRF), Green Recovery Challenge Fund (GRCF), Natural Course/EU Life (NC), and Heritage Lottery Fund (HLF), but there remains a significant resource gap to deliver an offsite BNG service in the region. Defra will be providing funding to support the transition to mandatory net gain (expected to be 0.6FTE per LPA for a period of approximately two years).

Funding from large scale infrastructure could be used to pump prime the process. TOE received a payment from a large rail scheme which assisted in initiating the process in Oxfordshire. The delivery of BNG work in Warwickshire has become self-

sustaining through the use of S106 payments and administration fees to assist in creating an ecology unit, however this has taken several years.

Understanding the need for offsite BNG and likely income streams within each District is paramount for making the business case for dedicated resource to unlock these potential income streams. This is already underway in some Local Authorities in Greater Manchester, but is not co-ordinated. Large landowners are undertaking strategic assessments of their land portfolios for BNG (e.g. Peel, United Utilities).

GMEU have begun to levy fees for facilitating offsite solutions with developers. There is the potential for this to develop into a chargeable pre-app service, however this is discretionary so would not catch all development. A simple process for this would be needed for it to be successful.

Technical

Ecological expertise within the Local Authorities is limited as resource is pooled within GMEU. There is a widespread need for training across the public sector (GMEU, planners, development managers) to enable the process. Alternatively ecological expertise could be outsourced. There is the potential for many in the public and third sectors (Woodland Trust, Wildlife Trusts, Groundwork, Forestry Commission, City of Trees etc) to work in partnership to help implementation of offsite BNG and potentially to provide funding and training. Cheshire and Lancashire Wildlife Trusts are discussing a joint Wildlife Trust BNG Technical Support Function.

There are a range of approaches to determining biodiversity unit value in other regions. Some have set a standard biodiversity unit value (ranging from £9k to £25k per unit), others have undertaken scoping exercises to determine the likely standard cost of different habitat type units (CWT), and others have calculated the costs of units for each specific site as it comes forward for registration. General consensus within Greater Manchester was that the process for determining unit values needs to be transparent and robust to prevent legal challenge, so a single “pan-habitat” biodiversity unit value cost was to be avoided. Funding for engagement with

landowners over prospective sites, or to cover process administration/management costs could be incorporated into the biodiversity unit costs or planning fees.

There are currently no strategic habitat banks within Greater Manchester, however the Greater Manchester Environment Fund is seeking proof of concept in the habitat bank investment model in 2021/2022. Until Local Plan policy is in place and there is sufficient confidence in the model to attract investment, strategic habitat banks are unlikely to become operational. The GMEF work has successfully bid for Natural Environment Investment Readiness Funding and will be embedded into Implementation Plan delivery.

There will be opportunities for GMEF to share learning at key milestones in 2021 and 2022. GMEF may be able to recycle the initial investment into the Salford Pilots across other front running Districts to pay for the setup of habitat banks through credit/unit sales to development. This is unlikely to be an option until 2022 at the earliest however. Unlocking private investment to deliver habitat banks is essential to scale up the provision of offsite BNG particularly if this requires land acquisition.

Environment

Clearly communicate the alternative: in the absence of a flexible framework of options, register of sites, and clear and simple processes to offset within Greater Manchester; there is a risk that GM will incur the biodiversity losses from development, but the biodiversity Greater Manchester gains will be realised outside the region.

There was uncertainty over whether Local Authorities would be able to refuse planning applications that result in biodiversity gains outside the authority or the city region. The “proximity principle” would increase the number of units and cost required to offset outside the city region, which would likely act as a deterrent.

The draft Local Nature Recovery Strategy (LNRS) for Greater Manchester has already been produced as part of the Greater Manchester Pilot and will be released in summer 2021. This will include a habitat map with opportunities identified for all

areas within Greater Manchester. The LNRS mapping will provide an opportunity to identify sites for offsite BNG in areas that will bring the best outcomes for biodiversity. There may be competition for these priority areas from different initiatives, and some offset sites may come forwards outside the priority areas of the LNRS. The Greater Manchester LNRS is part of a national pilot and there is no current local or Government funding to enable its delivery. Financial contributions from BNG are likely to be crucial to realise the ambitions of the LNRS.

BNG is inextricably linked to green infrastructure, wider environmental net gain and natural capital. There will need to be clear messaging and close working between these initiatives to deliver the best environmental outcomes.

KEY STEPS

Need and Supply Assessment

Need & supply assessments for offsite BNG are essential to support a business case for more resource across the region. For the GMEF Natural Environment Investment Readiness Fund bid, Salford City Council alongside Finance Earth undertook an assessment of the potential pipeline of development over a 5 year period to calculate the likely number of units and area of land required to offset in Salford. This was a relatively simple calculation based on a number of assumptions and also identified the value of the required units and therefore the potential income that could be unlocked by providing sites to offer these units.

A similar process is underway in some other districts (e.g. Rochdale), but most Local Authorities commented that they had no resource to undertake this. It is important to note that these high level assessments do not consider the habitat types that are likely to be impacted, and this is an important factor in a need and supply assessment going forwards to predict the scale and type of habitats required to be created to offset these losses.

Many private interests have or are developing corporate strategies that include BNG, and some already have a voluntary commitment to 10% in advance of policy. Some

large landowners are already undertaking need and supply assessments of their holdings/estates using GIS at a spatial scale to identify land for offsetting and the number of units required by their development programme. These assessments are being replicated across sectors and there are clear benefits to sharing learning.

Areas of Search and Identification of Potential Sites

The LNRS work in Greater Manchester is based upon environmental criteria and provides a clear baseline for the region on where habitat interventions should be prioritised to bring the best environmental outcomes. The LNRS mapping will enable areas of each District to be searched for potential sites using the habitat priorities identified within the LNRS. Further resource will be initially required to identify sites within Local Authority ownership. Identification of privately owned sites and engagement with landowners is likely to be time consuming so the initial search will focus on public land.

It is envisaged that a list of potential sites will be drawn up, and sites will then need to be screened, removing those which are unlikely to be able to deliver BNG, and focussing resource on those with a high chance of becoming registered. In addition to the criteria used to develop the LNRS, non-environmental criteria will be needed to screen sites.

There are a number of non-environmental criteria that were discussed during the interviews which would need to be considered when screening potential sites and these are discussed further below:

- Land value: Likely to be a major factor in whether land is offered for BNG, particularly if “sterilised” for the 30 year management period
- Tenancy type and length: Some tenancy agreements are prescriptive in their terms and termination clauses which could legally restrict land being put forward for BNG.
- Development potential: Land may be held to be developed in the future. This may not be in the next 5-10 years, however the minimum 30 year requirement for BNG may be prohibitive, particularly for large landowners. This is strongly linked to land values which are rising steadily across the region.

- **Management responsibility:** Responsibility for implementing the management needs remains to be determined. Habitat creation and management may not be compatible with existing farm practice, for example grassland creation and management requiring conservation grazing on land currently in arable cultivation. If implementing the creation and management is dependent on third parties, this needs to be agreed/secured during the screening and factored into any assessment of cost.
- **Designated sites:** Certain habitat creation or management practices may not be possible on designated sites;
- **ELMS:** Any land subject to payments for ELMS would not be permitted to receive payments for BNG for the same environmental outcomes. Varied feedback was offered on ELMS; some interviewees suggested the shorter duration of ELMS agreements would be more attractive, others suggested the certainty of income for the 30 year BNG management period would be more attractive.
- **Access:** Access would be required for vehicles and/or livestock to land parcels for habitat management and maintenance.
- **Environmental Net Gain – other criteria** could include carbon sequestration, flood risk management, water quality, community engagement, wellbeing and public access.
- **MAG Bird Risk Zone:** Creation of habitats that could attract birds within 13km of Manchester Airport likely to be restricted. Similar Civil Aviation Authority rules may apply to the City Airport and Heliport at Barton.

This list is not exhaustive, and work is required to develop a list of criteria that can be used alongside the LNRS to identify areas of search, screen potential sites, and target land where the best outcomes for biodiversity can be achieved. Screening of Local Authority owned land is seen as a quick win to identify sites to populate an embryonic register of sites and to develop the process. However, the same set of criteria will be used to screen both public and private land.

Two broad approaches to finding sites were offered in the interviews:

- Targeted search

Surrey Wildlife Trust initiated a targeted search of their Strategic Opportunity Areas (similar to a LNRS) to identify areas for habitat creation and used land registry data and existing knowledge of the area to contact landowners. TOE used a targeted approach which included large landowners with no development aspirations (MOD land, Royal estates), and also undertook sustained engagement about BNG opportunities with farming clusters.

- Open Market

Warwickshire County Council relied on an open market approach for sites to come forwards. Initial contact with NFU and Defra attracted farmers to come forwards, and WCC also own farms within the county. A role was created specifically to work with landowners who put their sites forwards. Other regions have used “reverse auctions” where landowners submit bids for funds to deliver units. The open market approach has a clear advantage of setting the market value for units, however this takes time.

Both the targeted search and open market approaches required sustained engagement from project officers to ensure sites progress through the assessment stages and are secured to deliver BNG. Without this, feedback suggested there would be a high degree of site attrition.

Natural England has recently undertaken a similar exercise to identify landowners willing to create ponds for GCN DLL in Greater Manchester.

A “Call for Sites” will be undertaken for the LNRS in Greater Manchester, initially for tree planting, and this could be used to invite applications from landowners to deliver BNG sites, but the “BNG offer” would need to be clear. It was generally accepted that a call for sites for BNG would only be worthwhile once all other options had been exhausted due to the resource required to screen sites and support applicants. NFU commented there is an increase in their members being contacted about environmental initiatives, but the members do not have sufficient information to make evidence-based decisions.

BNG Assessment

Baseline habitat assessments are required for potential sites. Large landowners are likely to fund or contract out habitat assessments and management plans, however farmers or smaller landowners may not have the skills or funds to do this, especially if there is uncertainty on whether they will be successful in registering their site.

GMEU have the skillset for this work, but only on a small scale, and National Trust, the Wildlife Trusts and Natural England also indicated they could have a role. Other regions offer grants from Environment Funds to undertake these assessments for sites, although these are mainly offered to larger sites with a high chance of success in site registration. It was clear from all sectors that funding of habitat assessments is a significant challenge.

Verifying habitat assessments, and assessing management plans and costs to deliver management is a new skill for most ecologists, planning officers and GMEU, and would require widespread training across the industry. Outsourcing is also an option.

Management Plan and Costings

Only a handful of management plans for BNG have been created within the region, and these are rarely accompanied by cost estimates to demonstrate that they are deliverable. A standardised approach will be required to ensure consistency, and a basic template is included in the GMCA guidance for BNG. Natural England reported that templates are being developed nationally in association with CIEEM.

Assessment of management plans, whether they are likely to be effective in creating or enhancing habitats, and whether the costs are proportionate are new skills in the industry so training is likely to be required.

Securing Funding and Legal Agreements

Financial and legal processes and agreements will be required to secure sites, and commit landowners or providers to delivering the habitat creation and management

and resolving any potential issues during the minimum 30 year management period. The standard approach currently across England is to use S106 agreements and planning conditions, however feedback from some interviewees was that this did not provide a sufficiently robust enforcement mechanism.

Differing views were given on the liability of implementing net gain over a 30 year period. When there is a shortfall of sites for financial contributions and funding pools within an organisation, the liability and risk lies with that organisation, which is then potentially vulnerable to legal challenge. This level of risk is seen as acceptable by some in the absence of local or national policy, however it is likely to become unpalatable when policy is in place. National guidance is expected on this, however an approach will be needed in Greater Manchester in the interim.

Delivery and Monitoring

Natural England discussed that a national site register will be set up to record all land where BNG is proposed across England, however it was commented that a local register would need to be maintained for reporting and tracking of units. There was general consensus that this would best sit with GMEU as the region's Local Record Centre and likely lead for BNG. The information that needs to be stored, how it is stored, and a tracking system to flag up monitoring and reporting intervals would be needed, and this would need to be compatible with any subsequent national system.

There was feedback across the sectors that monitoring will be essential to deliver BNG on the ground. Enforcement of non-compliance and a mechanism to rectify or mitigate for habitats not reaching target condition will be required. Natural England commented that there will be national guidance on this.

3.2 Key Gaps/Issues

There most frequently raised gaps and issues in the study are shown below:

Gaps	Issues
Need for offsite solutions is unknown	No Current BNG Lead in Region
Funding and Resourcing	Costs of Units Not Defined
Technical Expertise	GMEU Need Support to Deliver
Understanding the Process	Buy in to BNG from landowners
Clarity & Certainty	No Sites Available
Financial Process	Roles, Responsibilities, Process Not Clear
IT to Support System	Monitoring and Management to realise net gain

4.0 Implementation Plan

4.1 Role and Purpose

The Implementation Plan has been developed using the discussion themes from the study's stakeholder engagement. The Plan sets out actions required to ensure Greater Manchester is in a position to offer a flexible framework of offsite BNG solutions to developers, and the outcomes these actions aim to achieve.

A timeline for implementing offsite BNG has been developed from the study outputs and is included in Section 6.0. A flow chart setting out the main process steps is included as Figure 5.0. The timeline and flow chart were scrutinized in the stakeholder engagement workshops with a wider audience from the public, private and third sectors.

The priority actions for implementation in the immediate term (0-6 months) are highlighted in green. These are critical actions needed to:

- assess the need and supply of offsite BNG;
- communicate the timelines and options widely;
- agree on the lead organisation for offsite BNG;
- agree area of search and site assessment criteria and interrogate the LNRS;
and
- scope the options for baseline assessments

Establishing a flexible framework of offsite BNG solutions is a shared endeavour across several organisations and there is a need to invest resources to realise the ambition. Lead organisations are proposed for each of the priority actions with progress to be reported back to a BNG Implementation Team (BNGIT).

An indicative cost and potential source of funding (where known) has also been included for priority actions. Initially the BNGIT will be composed of the Scoping Study Steering Group membership as lead organisations on actions within the Implementation Plan. The BNGIT will initially have representatives from:

- GMCA;

- GMEU;
- Lancashire Wildlife Trust; and
- Natural England;

Membership will be extended to other organisations where needed, especially if their input is required to deliver the actions in the Plan.

It is important to note that the purpose of the BNGIT is to implement this Plan, act as an expert panel on BNG more broadly, and to provide a link across sectors in the region to share learning. BNGIT does not have a role in the day-to-day delivery of BNG and cannot influence the locations of sites, or outcomes of planning applications.

The Implementation Plan is tabulated below and is split into **Cross Cutting Actions (1-5)** which require co-ordinated input across all sectors, and the **Key Step Actions (6-11)** which relate to bringing forward sites across the region to deliver offsite net gain.

4.2 Cross Cutting Actions

Outputs from the scoping study suggest few options for offsite BNG are currently available within Greater Manchester, they are often reactive during the planning process and are resource-heavy to develop and implement. As a result, the infrastructure to scale up the delivery of offsite-BNG needs to be developed, and this will be dependent on the forecasted need within Greater Manchester. The cross cutting actions are grouped under the following themes.

1. Governance: Establishing clear roles and simple processes, a consistent approach, and a Greater Manchester site register.
2. Communications: Making the options clear, how and when to access them, raising awareness of BNG.

3. Funding: Reviewing current funding options and, based on the need, securing funding/resource to implement the plan.
4. Technical: Training and support of Local Authority staff, defining costs of biodiversity habitat units, sharing learning across Greater Manchester.
5. Environment: Using the evidence base of the LNRS to prioritise the options that bring about the best outcomes for biodiversity.

1: Governance

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
1.1	BNG Implementati on Team is established and oversees delivery of this plan, with links into the private sector to share learning	1.1. 1	Assign members of BNGIT across disciplines to include private sector membership. Immediate membership of BNGIT will be the Scoping Study Steering Group within invites to other sectors as needed Costs: low – internal	BNGIT/GM EU to Chair and coordinate plan delivery	Agreed membership and monthly review of plan and programme	Immediate term	GMEU	Based on GMEU as lead organisation in Action 1.3.1 Role of GMEU as Chair - minimum resource implications based on current Plan. As BNGIT role develops (if this is to include monitoring and reporting) further GMEU resource may be required.

			<i>Public sector and partners' costs, drawing from existing workstreams.</i>					NE & LWT both agreed to be founder members
1.2	Region has certainty of key timelines and milestones for mandatory BNG	1.2.1	Scoping Study timeline and milestones to be updated by BNGIT on monthly basis and shared within region. Key milestone will be when GMEU has sufficient resource to enable scaling up of implementation to assess planning applications and BNG.	BNGIT/GM EU to coordinate plan delivery	Updated timeline circulated from BNGIT	Immediate term	GMEU	Based on GMEU as lead organisation in Action 1.3.1 GMEU to coordinate Plan delivery and further resource requirement to enable scaling up.

			<p>Costs: low – internal</p> <p><i>Public sector and partners’ costs, drawing from existing workstreams.</i></p>					
		1.2.2	<p>Dates whereby 10% becomes local policy and where metrics become mandatory to be agreed and communicated widely.</p> <p>Costs: low – internal</p> <p><i>Public sector and partners’ costs, drawing from</i></p>	BNGIT, 10 x LA, GMEU	Key dates agreed and widely shared for awareness	Immediate term	LAs/GMC A supported by NE	Lead is dependent on which comes first “Places for Everyone” or local plans. NE to support LA delivery dependent on new roles being appointed to area team in Autumn 21.

			existing workstreams.					
		1.2.3	<p>Assessment undertaken of likely number of metrics/BNG reports/management plans to be submitted once 10% local policy is adopted.</p> <p>Costs – low – internal <i>GMEU/Salford</i> to accommodate in existing workstreams whilst low numbers of metrics are being submitted.</p>	Salford, GMEF GMEU, 10 x LA	Number of additional roles required and where to implement plan.	Immediate term	GMEU	<p>This is a trickle at present but increasing, GMEU informally monitoring at present.</p> <p>Not specifically within NEIRF bid, however Salford will be the LA that is likely to experience a rise in BNG documentation first so will need to monitor this to assess need for further resource when scaling up across Greater Manchester.</p>

1.3	Lead organisation/ point of contact responsible for delivery of offsite BNG in Greater Manchester.	1.3.1	Seek agreement within region on Lead organisation model, and most appropriate organisation Costs: low – internal to make decision.	10 LAs & GMCA, GMEU to agree approach	Lead Organisation identified	Immediate term	GMEU	<p>GMEU agreed to be the lead organisation for BNG.</p> <p>GMEU in good position to lead on BNG and for defining processes and roles.</p> <p>Further resource will be needed to fulfil remit. Likely dependent on further funding (potentially from Defra (0.6FTE per LPA, but would need agreement on where these site within the region))</p>
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		1.3. 2	Business case for expansion of GMEU. This assumes a lead organisation approach is adopted and GMEU is that organisation.	10 LAs & GMCA, GMEU, dependent on city-region need assessment	Business case to identify numbers of additional staff.	Immediate term	GMEU	In progress – request to PoG for 1.5FTE to support BNG (both on and offsite). This predominantly relates to increases in planning applications and assessment. Business case for all actions within this plan would be dependent on further funding
1.4	Clear processes	1.4. 1	Define processes and roles for:	GMEU, 10 LAs &	Agreed and clear interim	Short term	GMEU/L WT - IRF	GMEU to lead on review of existing

	and roles identified for all work associated with offsite BNG. Work is completed to high industry standards.		<ul style="list-style-type: none"> • Site search & registration • BNG Assessments & Metric • Management plans • Development management (planning) • Financial contributions • Compliance and enforcement • Validation • Cross Greater Manchester /LPA boundary and Greater Manchester /neighbouring 	GMCA to agree approach	processes and roles for Greater Manchester		<p>guidance as and when required i.e. annually by GMEU.</p> <p>Could be informed by survey of key stakeholders asking which parts are helpful and which need amending.</p> <p>Processes and roles expected to develop as experience grows across the region and learning is shared from GMEF.</p> <p>Production of new guidance/process likely dependent on further funding.</p>
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			county boundary approach					
			"Front running" LAs test approach					
1.5	Clear financial process for offsite BNG: providers know how much they will be paid, when and what the success criteria are. Applicants know how much they	1.5.1	<p>Agree standardised text for:</p> <ul style="list-style-type: none"> Planning conditions S106 agreements Legal agreements for sites <p>Develop payment schedule approach for offsite BNG options:</p> <ul style="list-style-type: none"> Initial Lump sum 	GMCA, 10 LA, GMEU, Legal input, BNGIT link to developers/landowners	Consistent approach and documentation across Greater Manchester.	Immediate	Greater Manchester Development Managers Group with support from GMEU, NE & WT	<p>Greater Manchester Development Managers need guidance on how to write these i.e. how these work alongside new system.</p> <p>NE support for LAs dependent on new roles being appointed to area team and what support is required. NE to provide examples from GCN District Level licencing (DLL).</p>

	pay, and when.		<ul style="list-style-type: none"> • Payments for outcomes (for example against success criteria at monitoring intervals) <p>National Guidance on this outcome may emerge in time.</p>					GMEU support would require additional ecologist time
1.6	A Greater Manchester - wide register of sites at a district level is held and maintained by the single organisation.	1.6.1	Create geodatabase of GIS layers of sites that have been assessed and verified as potential sites.	GMEU/IT resource, 10 x LAs	Geodatabase showing locations of verified sites	Short term	GMEU	<p>To follow on from existing LNRS mapping work but will require additional resourcing.</p> <p>GMEU would require additional resources (ecologist and data management)</p>

		1.6.2	Develop system to centrally store the management and other documentation associated with each site.	GMEU/IT resource, 10 x LAs	File storage system	Short term	GMEU	As above
		1.6.3	Develop system to track sites funded by development through the 30 year monitoring and management duration	GMEU/IT resource, 10 x LAs	Operational system to track sites towards the delivery of net gain.	Medium term	GMEU	As above

2: Communications

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
2.1	Public, private and third sectors all understand	2.1.1	Review similar environmental engagement work (DLL, ELMs; to identify the best	BNGIT/NE/ELMS T&T	Communications strategy	Short term	GMEU with support from	GMEU to develop as lead organisation.

	the framework of options and steps to deliver offsite BNG		methods of communication)				NE/WT/GMCA	GMEU would require additional resource to deliver this.
		2.1.2	Develop clear and simple communications material with key contacts for sharing within the region. Costs: low – internal, can base on existing comms.	BNGIT/GMEU	GMEU section on website for offsite BNG High level leaflets	Immediate term	GMEU with support from NE/LWT & GMCA	GMEU to develop as lead organisation with support from LWT/NE GMEU would require additional resource to deliver this.
		2.1.3	Develop material aimed at the farming community to clearly explain BNG, what the offer is in	BNGIT/ELMS T&T/NE/NFU	GMEU section on website for offsite BNG	Short term	NE	To be delivered as part of NE Greater Manchester Future Schemes Convenor

			Greater Manchester, and how this interacts with other initiatives such as ELMS.		High level leaflets			and links to action above.
		2.1.4	Route all communications through the single organisation and advocates identified to support BNG to avoid mixed messaging.	BNGIT/ELMS T&T, NFU	GMEU section on website for offsite BNG Key contacts	Short term	GMEU	GMEU to coordinate as lead organisation. GMEU would require additional resource to deliver this.
2.2	Visible promoter of BNG as a concept and benefits to city region of approach	2.2.1	Identify Greater Manchester Champion	GMCA/10 x LAs and NE	Social media presence & regular comms	Medium term	GMCA	In progress

3: Funding

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
3.1	A range of funding streams are available to support the implementation plan.	3.1.1	Undertake a review to identify how the work is currently funded, what level of additional resource is required to deliver the additional processes and roles identified above. Dependent on outcomes 1.2 and 1.3	10 x LAs & GMCA	An understanding of how the current model is funded and the increase needed to deliver offsite BNG	Immediate/ Short term	GMEU	GMEU as lead organisation to review and identify what activities are funded under the SLAs and what are not to determine funding gap. GMEU are already doing this, Defra looking to fund LA planning departments for additional burden.
		3.1.2	Review of all potentially available funding streams for technical advice and support (IRF, GRFCF, NC, HLF	10 x LA/GMEU/GMCA	Potential options to fill the funding gap	Short term	BNGIT	Ongoing

			etc). Will need to consider whether funds are restricted in terms of their use.					
		3.1. 3	<p>Develop business case for additional resource. This will need to be based on the need and supply assessment for the region to demonstrate the level of additional resource, and when this resource is needed.</p> <p>Dependent on outcomes 1.2, 1.3, 6.1, 6.2</p>	10 x LA/GMEU GMCA	Business case to secure funding to deliver offsite BNG.	Short term	GMEU	GMEU as lead organisation to review and identify what activities are funded under the SLAs and what are not to determine funding gap.

4: Technical

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
4.1	Staff within the LAs and single BNG organisation have sufficient skills and expertise to deliver their roles	4.1.1	Review in-house ecological expertise within public and third sector.	10 x LA/GMEU GMCA/Third Sector	Review of expertise across public and third sectors	Short term	GMEU	<p>GMEU to review expertise within public and third sectors.</p> <p>Primarily this is to identify staff across the region who could assist in the training programme, for example it was commented that authorities may have ecologists in non-ecological positions, and City of Trees/National Trust/Groundwork could have roles in delivering training on</p>

								habitat management etc.
								GMEU would require additional resource to deliver this.
		4.1.2	<p>Identify training needs for staff (GMEU/DM/Strategic) through consultation.</p> <p>Likely to include:</p> <ul style="list-style-type: none"> Habitat assessments Use of/scrutiny of metric Register of practitioners/accr edited staff 	<p>10 x LA/GMCA GMEU/Third Sector</p> <p>External training providers</p>	<p>Training needs are identified and providers secured to deliver training</p>	Short term	NE with support from LWT and PAS	<p>Natural England to lead as part of LA support work and link into PAS work to provide training and support.</p> <p>NE leading this action dependent on new roles being appointed to area team.</p> <p>Potential outsourcing of training or national approach (e.g. Metric</p>

			<ul style="list-style-type: none"> Habitat creation/methods BNG interactions with other policies 					webinars in Autumn 2021 and further BNG training roll out)
4.2	An interim approach to the price of biodiversity units is agreed, and can be communicated clearly to potential offsite-BNG providers.	4.2.1	<p>LPAs/GMCA/GMEU to decide on whether to set an interim standard unit price, or whether to commission work into fully costing different biodiversity unit costs for creation/restoration/management.</p> <p>Will need to consider potential for legal challenge.</p>	GMEF/CWT /LWT/FE 10 x LPAs/GMCA	Agreed and consistent approach to the value of units across Greater Manchester.	Immediate term	LWT/CWT with support from GMEU	<p>Consensus is that a standard unit price is only relevant for initial basic income projections, but not for planning applications.</p> <p>Wildlife Trusts (CWT & National) have worked on unit cost prices for habitats, so LWT & CWT to develop approach for costs with support from GMEU and others as appropriate.</p>

			Costs – low/moderate. <i>Public sector and partners' costs</i> – may be included within GMEF work in Salford, alternatively LWT can liaise with CWT over work done in Cheshire to develop approach for Greater Manchester.					
4.3	Greater Manchester habitat banks established which enables mobilisation of additional	4.3. 1	BNGIT works closely with GMEF and Pilots in Salford to share learning with other LAs.	GMEF, Salford + 9 x LAs, GMCA,	Disseminate learning to other LPAs	Medium term	BNGIT/L WT with support from GMEU	BNGIT to identify when and where habitat banks are set up in Greater Manchester through engagement with other sectors.

	investment for BNG offsite options.							<p>Habitat Banks may be established in the region by others.</p> <p>LWT to lead on work in Salford and share learning as work progresses.</p>
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5: Environment

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
5.1	Offsets to Greater Manchester schemes are retained within Greater Manchester	5.1.1	Communication material developed for the region to demonstrate the risks of not identifying sites within GM to offset.	GMEU/BNG IT/BNG Champion	Risks included on comms material	Medium term	LWT	Pending IRF application and work to be delivered as part of Investment Analyst / Partnership Officer posts in LWT.

								<p>Potential link to Action 2.5 within the NEIRF bid.</p> <p>Depends on sufficient sites being available within Greater Manchester to direct offsets within region.</p> <p>Links to “need” assessment work in Outcome 6.1 below.</p>
5.2	The best outcomes for biodiversity and natural capital are prioritised	5.2.1	Use the LNRS evidence base to determine the best locations for offset sites	All sectors	Need and supply assessment (see outcome 6.1)	Short term	GMCA/LWT	Based on Outcome 7.1
		5.2.2	BNGIT links into Natural Capital	BNGIT	Ongoing engagement	Medium term	BNGIT	

			group to ensure aligned approach to deliver the best outcomes.		through BNGIT			
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4.3 Key Step Actions

Building on the Cross Cutting Actions, Key Step Actions are relate to the initial steps required to assess the need and supply of units across the city region and to focus resource on bringing sites forward to develop a local site register.

Outputs from the scoping study suggest the high level key steps required to deliver a flexible framework of options are:

6. Need and Supply Assessment: Identifying the likely requirement for biodiversity units across the public and private sectors;
7. Areas of Search and Identification of Potential Sites: Development of criteria to screen potential offsetting areas and assess sites against, and using the LNRS to target areas of search within each Local Authority. Assessing Local Authority-owned land is seen as an important step to quickly identify sites for a register;
8. BNG Assessment: Scoping of options on organisations who can undertake baseline habitat assessments of sites screened in during the site search;
9. Management Plan and Costings: Developing templates for Habitat Management Plans, training for staff on the assessment of management measures and costs to deliver, and work to understand the potential role of the third sector in implementing Habitat Management Plans;

10. Securing Funding and Legal Agreements: Testing the processes developed in the cross cutting actions and seeking legal advice to develop a standard approach to securing sites across Greater Manchester; and

11. Delivery and Monitoring: Developing an interim approach to monitoring the delivery of net gain in advance of a transition to a national model.

6: Need and Supply Assessment

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
6.1	The number and type of biodiversity units needed over a 5 year period for each LPA is known. This enables the LNRS to be reviewed to identify areas and sites	6.1.1	Each Authority runs the analysis based on the method used for Salford City Council as part of the Natural Environment Investment Readiness Fund for the next 5 years of development.	10 x LAs/GMEU/ GMCA GIS resource needed for refining Funded by Natural	First output is a simple calculation of the number of units and area required for each Local Authority This step can be refined by undertaking	Immediate term	LWT or GMCA pending IRF, with support from NE (used development baseline for GM in DLL work).	Already underway in some districts including Salford and Rochdale- to be developed further as resource becomes available. Natural Environment Investment

	within each LPA with the potential to provide these units.		Costs – moderate. <i>Public sector and partners'</i> costs – GMCA seeking Natural Course funding to run this work across Greater Manchester. Local Authority & GIS resource needed to identify development need.	Course Phase 4?	desk based assessment of baseline habitats using remote sensing data, available habitat data, and GIS analysis to estimate habitat types and areas that will be required.		<p>Readiness Fund work looks at this at the site level in Salford City Council and how to scale up to other Local Authorities and is delivered as part of Investment Analyst/Partnership Officer posts.</p> <p>NEIRF assessment likely to cover 3 Local Authorities including Salford.</p> <p>If not funded through IRF then Natural Course</p>
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								has built in resource but unable to commence until Oct 2021.
6.2	Private and Third Sectors undertake their own assessments and where there is potential to offer units or credits to development, these schemes are supported through the site	6.2.1	Ongoing engagement through BNGIT to share learning across sectors on need and supply assessment principles. Identify support to manage sites through the Greater Manchester site registration process	BNGIT/GM EU GMEF/Salford/ CWT	Sharing of information at key points of GMEF & Salford pilots. Resource identified to engage with potential sites.	Immediate term	BNGIT	Need to ensure clear link to the LNRS for all sectors. BNGIT to lead on this by requiring engagement across sectors. LWT (Salford pilots/GMEF) and CWT (operational BNG) key inputs to this.

	registration process		Dependent on outcomes 1.1 and 2.1 Costs: low – internal <i>Public sector and partners'</i> costs, drawing from existing workstreams.					
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7: Areas of search and identification of potential sites

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
7.1	Potential offset areas searched and sites screened against a set of criteria alongside the	7.1.1	Using the need assessment for each District, develop area of search methodology and site screening criteria. This	GMCA/GME U/ 10 x LAs/CWT/L WT/NE BNGIT Study outputs	Mapping showing areas to target to deliver need.	Immediate Term	WT and NE based on NRA project approval.	Draft list of criteria included in Section 3 of this report. If not specifically funded by IRF bid, this could be

	<p>LNRS for Greater Manchester to target land where the best outcomes for biodiversity can be achieved. Sufficient land of the right habitat types is brought forward in the right areas.</p>		<p>focusses on a desk based assessment, and information required from potential offsite BNG providers to enable screening.</p> <p>It is recommended that a 25% margin of error is sourced for each habitat type.</p> <p>Costs: low <i>Public sector and partners' costs,</i> drawing from existing workstreams. A draft list will be</p>	<p>GIS resource</p>	<p>Methods for searching areas and criteria for screening sites is agreed across the region.</p>		<p>included as part of the "Areas of Search" commission below.</p> <p>Significant resource is required to deliver this across all 10 districts.</p>
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			produced as part of the Scoping Study.					
		7.1.2	<p>Landowners are contacted to assess their appetite for BNG, and for information relating to criteria to enable sites to be screened.</p> <p>Dependent on outcome 6.1</p> <p>Costs – moderate <i>Public sector and partners' costs</i> – GIS resource required. Dedicated resource needed to</p>	GMCA/GMEU/10 x LAs NE/BNGIT	A potential list of sites is created and sites are screened against criteria.	Immediate term	GMCA with support from GMEU/NE and LWT	<p>GMCA commission consultants through Natural Course Funding to use criteria to undertake screening of sites.</p> <p>Or based on Action 1.3.2 this could be delivered by GMEU with additional resourcing. A dedicated project officer role would be the best option</p>

			seek key information such as landowner information, tenancy agreements, development ambitions, and high level habitat assessment from aerals.					to retain this expertise in house.
		7.1. 3	Assess Local Authority landownership against areas of search and criteria to identify “quick win” sites in public ownership.	10 x LAs/GMCA resource	Mapping of LA owned/manag ed sites to deliver need.	Immediate term	LAs with support from GMCA/GM EU/NE and LWT	Already underway in Salford and Rochdale, with other Local Authorities following so work needs to be co-ordinated.

			<p>Dependent on outcome 6.1</p> <p>Costs – moderate <i>Public sector</i> costs – GIS resource required. Dedicated resource needed to seek key information such as landowner information, tenancy agreements, development ambitions, and high level habitat assessment from aerials.</p>					<p>Could be included as part of commission above.</p> <p>Also could be included as part of NE LA support work dependent on new roles being appointed to area team (Autumn 2021)</p>
7.2	Approach intertwines	7.2.1	Engage with large landowners on	BNGIT/GM EU	Strong links with major	Short term	BNGIT	Ongoing once group set up

	private, public and third sector landownership		<p>BNG. Regular liaison with large landowners (EA, UU, Peel) as work develops.</p> <p>Dependent on outcomes 1.1, 2.1, 7.1</p>		landowners in region as they develop their own processes.			
		7.2.2	<p>Approach, timeline, and reference material for “Call for Sites” for offsite BNG is agreed. Criteria for site selection to be shared as part of process to show what we are looking for.</p>	GMCA/GME U/10 x LAs	Call for sites process is determined and actioned.	Medium	GMCA with support from LAs	Only required if all other options to find sites have been exhausted and sites are needed in particular districts.

			Dependent on outcome 7.1					
7.3	Sites with significant potential to provide offsite BNG are provided with dedicated support to manage them through the process	7.3.1	Identify the sites with significant potential, and identify ongoing support to manage through the site registration process. Dependent on outcomes 1.3, 1.4, 1.5, 2.1, 3.1, 4.1, 4.2	GMEU/10 x LAs	Greater Manchester site register is populated with approved sites	Short – but ongoing	GMEU	GMEU – dependent on further funding to deliver this action.
		7.3.2	Prioritise sites with the potential to develop into habitat banks.	GMEU/10 x LAs	List of larger sites with potential to become strategic habitat banks.	Medium	GMEU	GMEU – dependent on further funding to deliver this action.

			Dependent on outcomes 1.3, 1.4, 1.5, 2.1, 3.1, 4.1, 4.2					
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8: BNG Assessment

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
8.1	Baseline habitat assessments are undertaken to the required standard for sites screened to the next stage of the registration process	8.1.1	Identify options/providers with the potential to undertake baseline assessments: <ul style="list-style-type: none"> • GMEU/LWT/CW T/NT/NE • Developer/Landowner funded • Grant funded • Recruit specific resource 	GMEU, LWT, Public and Private Sectors	List of options, potential providers and costs for baseline habitat assessments.	Immediate term	GMEU	This activity is an exercise to work out the options for who can undertake the baseline assessments and the likely costs, taking into consideration things like conflicts of interest and funding.

			<p>Dependent on outcomes 1.3, 3.1, 4.1</p> <p>Costs – moderate <i>Public sector, partner and external funding</i> costs – GIS resource required. Habitat survey resource needed (potentially external if cannot be sourced internally).</p>					<p>It is not anticipated that GMEU would do the habitat assessments (apart from public land) and this work would be a significant resource implication with potential conflicts of interest.</p>
		8.1.2	Identify and train key staff to engage with site owners to agree what habitat	GMEU/ 10 x LAs/Third Sector	Guidance/training on evidence needed to	Short/medium term	LWT with support from CWT & GMEU	GMEU commented that this work is currently beyond the capabilities of

		<p>interventions (habitat creation/restoration/enhancements) are achievable, and whether they can undertake these works, or would need habitat management partners to deliver.</p> <p>Dependent on outcomes 1.3, 3.1, 4.1</p>		<p>demonstrate potential uplift in biodiversity and how to scrutinise proposals</p>			<p>GMEU except on limited scale.</p> <p>GMEU – dependent on further funding/training to deliver this action.</p>
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9: Management Plan & Costings

<u>Outcome</u>	<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
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9.1	Habitat management plans are SMART, have clear roles and responsibilities	9.1.1	Develop template within Greater Manchester GM BNG Guidance further to include roles, responsibilities, monitoring intervals, remedial actions, and recommendations on how to cost (will need to include costs to monitor) Dependent on outcome 1.4	GMEU/Third Sector	Developed Habitat Management Plan template and guidance	Short term	GMEU	<p>Templates are being developed nationally.</p> <p>GMEU to monitor habitat management plans that are submitted with applications and revise GM template as necessary.</p>
		9.1.2	Assess potential roles for third sector to undertake habitat management/trainin	GMEU/Third Sector	Understand role of third sector in habitat	Medium term	BNGIT	Much of the experience of habitat management lies

			g or assessment of habitat management plans		management and potential for support/training/verification.			in the third sector. BNGIT to connect to Groundwork/CoT/NT/LWT on roles and opportunities.
9.2	Habitat Management Plans are accurately costed and will deliver BNG	9.2.1	Ensure staff involved in verification of HMP have sufficient skills/ or outsource assessment. Cost per unit of could be assessed against Greater Manchester GM unit price in 4.2 Dependent on outcomes 1.3 and 4.2.	GMEU/Third Sector	Guidance on assessment of habitat management plans.	Medium term	WT	This action is about ensuring that when a HMP comes in for a site, whoever is assessing it (GMEU) have the skills to do this, and to ensure that the costs associated with the works are sufficient and proportionate to deliver it.

								Included as medium term, with the Lead as LWT/CWT as the WTs probably have the most experience on this and can include any learning from GMEF and Salford pilots.
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10: Securing Funding and Legal Agreements

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
10.1	There is a Greater Manchester standardised process and	10.1	Test process and standard documents in outcome 1.4 on early sites that	10 x LAs, GMEU, GMCA, Legal advice	Standard process and legal documents, proof of	Short – medium term	GM Development Management with	Dependent on outcome 1.4

	legal document templates.		come forwards to refine process.		concept with early adopting LAs		support from GMEU	Ultimately there will be national guidance on this. Share learning through BNGIT
	Assessing Legal and Financial Risk	10.1.2	Seek legal input into potential risks such as liability to deliver BNG, non-compliance, etc.	10 x LAs, GMEU, GMCA, Legal advice	Risk Register	Short – medium term	GM Development Management with support from GMEU	Will require support from planning lawyers.

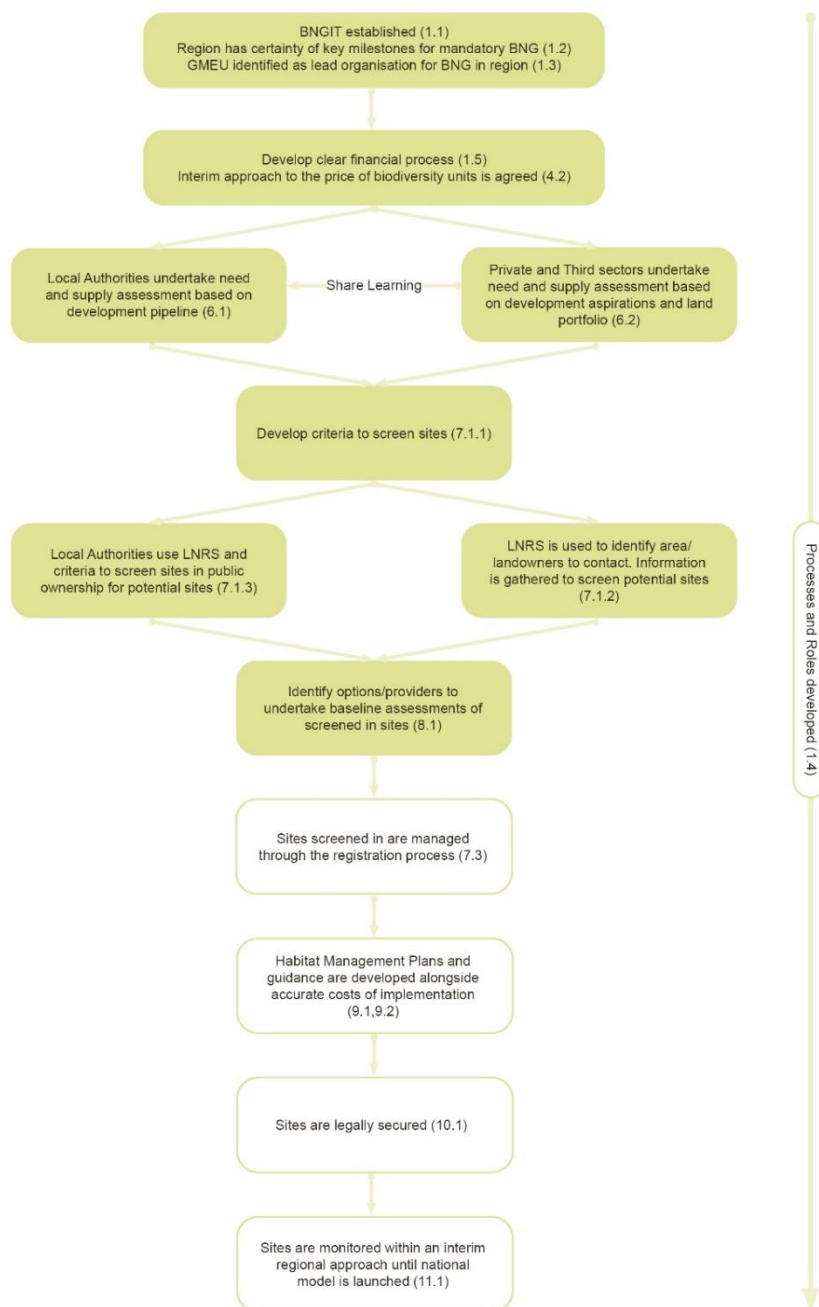
11: Delivery and Monitoring

	<u>Outcome</u>		<u>Action</u>	<u>Resources</u>	<u>Outputs</u>	<u>Timescales</u>	<u>Lead</u>	<u>Comments</u>
11.1	The Greater Manchester Approach for delivery and	11.1.1	Identify what information needs to be stored (GIS files, Management Plans	GMEU, 10 x LA, GMCA, NE/National	Tracking of Greater Manchester and National	Short term	GMEU with support	To determine as part of early implementation.

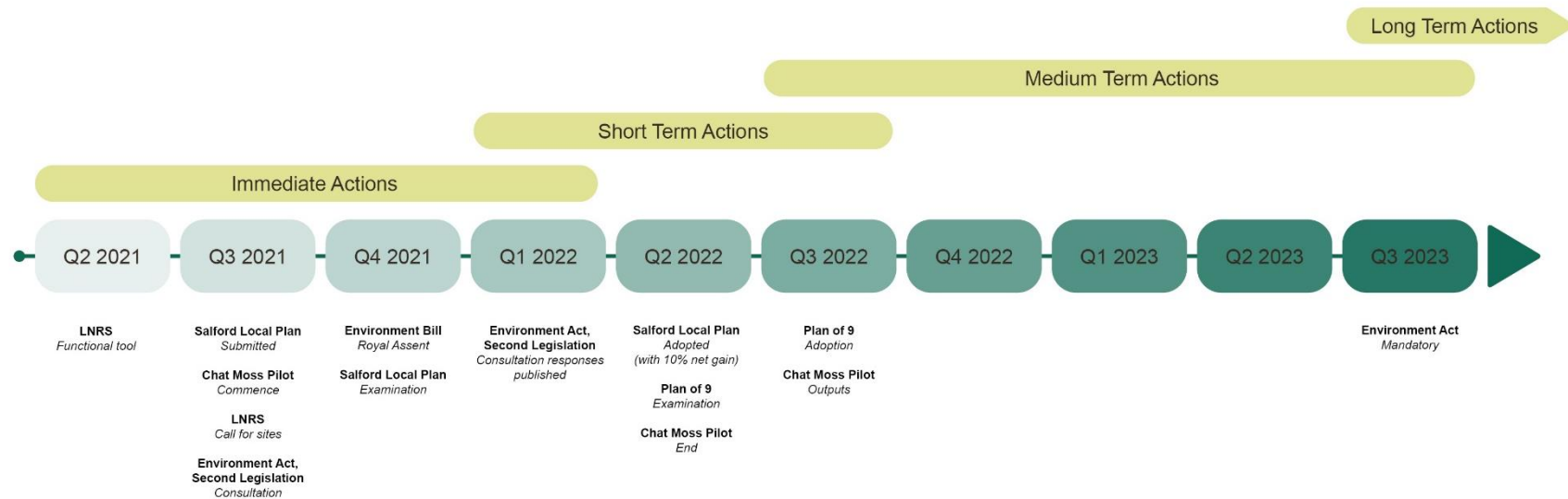
	monitoring works effectively until a national approach is adopted.		etc), and have simple tracking system to flag monitoring intervals and potential compliance checks. BNGIT links into National Government to ensure transition to National Model and site register is smooth.	Government , BNGIT	approaches towards mandatory BNG in England		from BNGIT	GMEU have the necessary templates and processes to provide monitoring but would need additional resource to scale up. Initially a simple system to record reporting intervals for sites with HMPs is required.
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5.0 Key Steps

The draft flow chart consulted upon during the scoping study workshops has been further developed to align with the Implementation Plan and is included below. This displays the priority outcomes and actions in green alongside other outcomes and actions that are inextricably linked to them.



6.0 Timeline towards mandatory BNG



7.0 Theory of Change

Vision/Final Goal - A network of sites and a flexible framework of delivery options is established to support the delivery of BNG off-site requirements in Greater Manchester.

Problem	Activities	Immediate/Short Term Outputs	Medium/Long Term Outputs	Strategic Outcomes
The likely need for offsite solutions is unknown, and the availability of land/appetite for landowners to engage is unknown.	Need and supply assessment, area of search, site screening, baseline habitat assessments, develop management plans and monitoring mechanism.	Understanding of need and supply across region. Sites screened against LNRS and criteria to produce preliminary site register. Baseline assessments undertaken on sites within register	Habitat Management Plans and monitoring proposals are developed and fully costed. Sites are legally secured and populate the Greater Manchester register.	A Greater Manchester site register is available for developers to secure offsite solutions

Limited capacity / knowledge within GMEU and the Local Authorities to deliver BNG.	Investigate options for ongoing resourcing, training and support.	Business case developed using need and supply assessment for additional resource and training.	GMEU expands as workload increases, initially using UK Government funds. Roll out of local and national training.	GMEU and Local Authorities are sufficiently resourced and trained to deliver.
Lack of established funding mechanism to support BNG.	<p>Chat Moss Pilot and GMEF to develop mechanism and attract investment.</p> <p>Develop approach to cost biodiversity units.</p>	<p>Chat Moss Pilot and GMEF are developed and produce outputs.</p> <p>An interim approach to costing biodiversity units is developed by the Wildlife Trusts</p>	<p>GMEF provides proof of concept model for habitat banking in Salford and shares learning to other Greater Manchester Authorities.</p> <p>A robust and transparent valuation of biodiversity units informs assessments.</p>	<p>GMEF is operational, attracting investment, and directing grants to projects.</p> <p>Biodiversity unit values are proportionate, and accurately reflect the costs of implementing habitat creation/restoration to fund the process.</p>

The offsite solutions and the processes to identify and secure them are poorly understood.	BNGIT to progress Scoping Study Implementation Plan. Processes and roles developed by GMEU as work progresses.	BNGIT established to co-ordinate all work on BNG. Processes and guidance are developed, including financial and legal agreements to secure site.	Offsite solutions are refined and processes and guidance are tested with early adopting Local Authorities. Regular communications across all sectors as work develops.	A framework of offsite BNG options is available and well understood in Greater Manchester, and can easily transition to a national model when BNG is mandated.
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8.0 Conclusions

Biodiversity Net Gain is gathering momentum in England with regions developing the infrastructure required to deliver BNG through the planning process before 10% net gain is mandated by the Environment Bill. Greater Manchester is well placed to be at the forefront of BNG in England having been selected as one of five pilot areas to develop a Local Nature Recovery Strategy and having secured funding to progress the Greater Manchester Environment Fund and proof of concept model into repayable finance and habitat banking.

This Scoping Study focussed specifically on offsite solutions that are required when development cannot achieve a prescribed level of net gain within the red line boundary. The number of schemes likely to require offsite solutions in Greater Manchester is unknown, as is the extent of land and types of habitats to be created to offset development losses. In the absence of local plans and policies requiring net gain, few schemes are currently securing offsite solutions, and these often involve significant resource from Local Authorities and GMEU.

There was a high level of interest and engagement in the Study from stakeholders across the region with many already actively looking into the opportunities that BNG can bring. Combined with lessons learnt from early adopting regions, feedback from the interviews and workshops has helped developed an Implementation Plan which focusses on immediate actions to drive the work area forwards including a need and supply assessment, site register, and marketing of offsite solution options. These are identified as the best endeavours, and in some cases may be subject to additional funding or interventions to progress regionally.

Organisations across sectors and across the region all have a role to play to ensure Greater Manchester continues to progress ahead of time to ensure the region is ready for implementation. The establishment of the BNGIT will oversee the delivery of the Implementation Plan, and will mark a transition from thinking to doing. It has been agreed that GMEU will be the lead organisation on BNG within the region, with further resourcing of the Unit essential to ensure it has the capacity to deliver its role as this develops.