

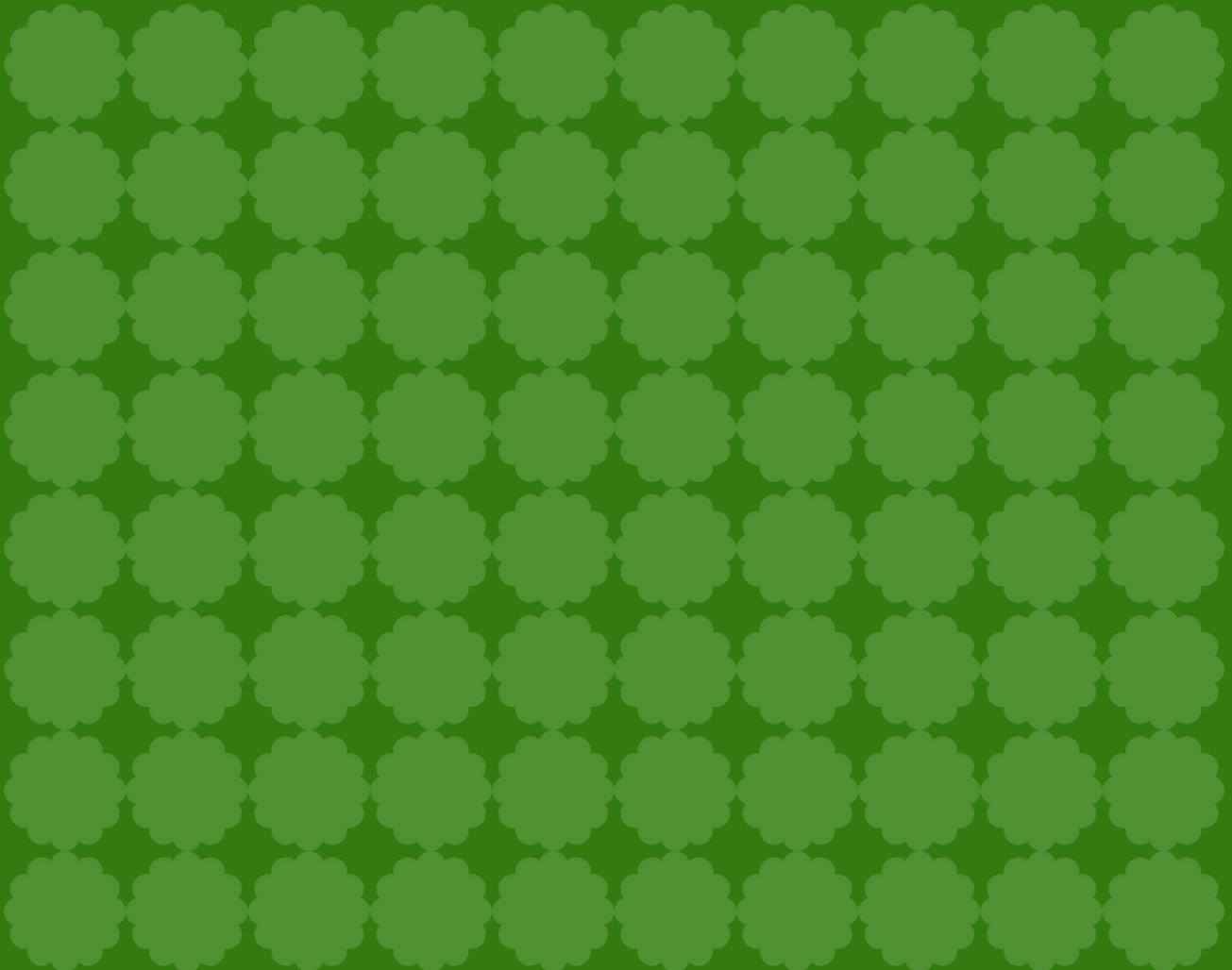
**GREATER
MANCHESTER**

DOING THINGS DIFFERENTLY FOR THE ENVIRONMENT

Symmetry Park, Wigan, and Biodiversity Net Gain

DB SYMMETRY Ltd Case Study

March 2021



Introduction

Symmetry Park in Wigan was put forward for large-scale employment use as part of the Greater Manchester Spatial Framework (GMSF). The site is on land at Junction 25 of the M6 motorway and is mostly improved grassland with some areas of semi-improved grassland, woodland, scrub, hedges, and ditches.

Making a set of assumptions about the landscaping at the outset of the application process then updating this when the full application is produced will clarify the impacts and the compensation required. Agreeing to deliver Biodiversity Net Gain with a specific percentage and a clear method for offsite compensation can avoid costly delays and would have resulted in this development moving through the planning process more quickly.

The application is split into a smaller area under a full planning application and a larger area under an outline application. The development of the site will result in the loss of most of the existing habitats and although there will be landscaping on site it was not deemed possible to deliver

Biodiversity Net Gain on site. As a result, a fee was agreed via a Section 106 agreement for the creation and enhancement of reedbeds, marshy grassland, fen, and enhancement of reedbeds, marshy grassland, fen and species-rich grassland on land owned by of Wigan Council. With this offsite habitat work, the project was considered to be able to deliver Biodiversity Net Gain.

The following case study was an initial pilot undertaken in 2018/19, which was an example led and submitted by the developer. The Local Planning Authority does not endorse the findings of this work but is happy for this work to be shared.

Background

In 2018, DB Symmetry Ltd submitted a hybrid planning application to Wigan Council for a large-scale employment park and distribution centre to be known as ‘Symmetry Park’ (Figure 1). The site, while within the Green Belt, was put forward as part of the Greater Manchester Spatial Framework (GMSF, 2020). The site is on land at Junction 25 of the M6 motorway, Wigan, which is bounded by the M6 slip road, the A49 Warrington Road junction to the east, agricultural land to the north and the M6 motorway to the west. The site is considered suitable for logistics and has direct access to the M6 Junction 25 slip road, meaning vehicles do not need to pass through residential areas to reach it.

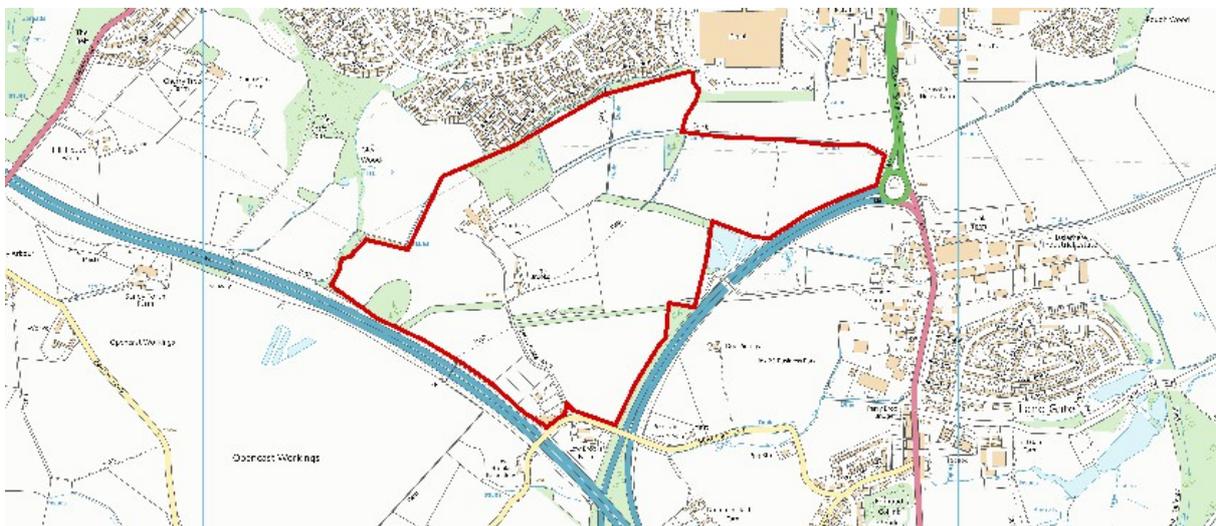


Figure 1 – Map of the location and extent of the Symmetry Park application site (bounded in red).

The site is currently greenfield, with a mixture of agricultural land uses (mostly silage grassland), some residential properties and some semi-natural habitats (plantation woodland, closed scrub, hedges, ditches and semi-improved grassland). Up until the 1980s the land was used for coal mining and ancillary activities (Figure 2).



Figure 2 – Ariel view of the Symmetry Park application site.



Figure 3a – Illustrative masterplan of Symmetry Park.



Figure 3b – Detailed application boundary (red) and outline application boundary (green) for Symmetry Park.

Development of the site requires the demolition of existing buildings and reprofiling. This reprofiling comprises of:

- Full planning permission for the smaller area, consisting of the erection of 27,871m² of employment floor space, including two units and the provision of associated infrastructure such as a sub-station, car parking, landscaping, access from the A49 roundabout and internal estate road.
- Outline planning permission for the larger area consisting of the erection of up to 106,095 square metres of employment floor space, including car parking, internal estate road and landscaping. All matters, except for access, are reserved with access proposed from the A49 roundabout. See Figure 3a and 3b.

The proposals included site clearance and ground preparation works, followed by the provision of structural landscaping, surface water attenuation ponds and associated landscaping. The planning application was presented to the Planning Committee of Wigan Council in January 2020, which decided to approve the application because of the economic benefits the scheme would bring. However, because the development would represent a departure from the Local Plan, the application was submitted to the Secretary of State for a final decision.

Environmental Impact Assessment

Due to the scale of the application, Wigan Council decided that the development required an Environmental Impact Assessment (EIA) and, accordingly, an Environmental Statement (ES) was prepared and submitted as part of the planning application. Specialist ecological advice on the application was provided to Wigan Council by Greater Manchester Ecology Unit (GMEU) and comprehensive ecology surveys were carried out by The Environment Partnership (TEP) to inform the planning application. The site was considered to have low potential to support any specially protected or priority species, except for small numbers of foraging bats and nesting birds.

Although the site is dominated by species-poor improved agricultural grassland, it does support locally important habitats including hedgerows, trees, ponds, woodland and semi-improved and wet grassland (Figure 4).

The Construction Environmental Management Plan (CEMP) proposed measures to reduce disturbance effects, including careful timing and programming of the works, to ensure that wildlife, such as nesting birds, were not disturbed during construction activity.

The main environmental impacts of the scheme will be the relatively large-scale losses to semi-natural habitats and greenspace. Although attempts were made during the planning process to avoid harm to these habitats, to retain locally important habitats, and the proposal of new landscaping, it was clear that the development would be likely to result in losses to biodiversity within the application red line because of the scale of the proposed built development.



Figure 4 – Phase 1 habitat survey of the Symmetry Park site.

How the Scheme Considered Biodiversity Net Gain

From an early stage in the application process, GMEU advocated Biodiversity Net Gain for this development proposal, and from the outset the developer showed a willingness to achieve this aspiration. The developer agreed that the requirement for biodiversity increase should be 10%, based on Defra's response to their Biodiversity Net Gain consultation in the summer of 2019. Calculations of losses in Biodiversity Units and the number of units required to achieve a 10% net gain were made using an accepted metric.

The hybrid nature of the application (with part as a full application and part at outline stage) made accurate calculations of potential losses more nuanced because fully detailed layouts of the development platforms were not available. For the purpose of the calculations, the consultants assumed that the area within the boundary of the outline application would be cleared entirely of semi-natural greenspace and that no new landscaping would be delivered within this area, while taking into account the landscaping associated with the full (detailed) application. This follows a worst-case scenario for the on-site biodiversity but allows the assessment to be simplified for the outline application (Figure 5) with total loss of habitat assumed within the grey area.



Figure 5 – Plan of assumed habitat losses within the Symmetry Park outline application boundary (grey).

In practice, it is likely that some landscaping elements will be provided for each development platform, so on-site habitat compensation will be greater in the long-term than the calculations of on-site losses would indicate. Figure 6 provides an example of the landscaping that could occur within the development, but this was not used to inform the calculation of the gains on site.

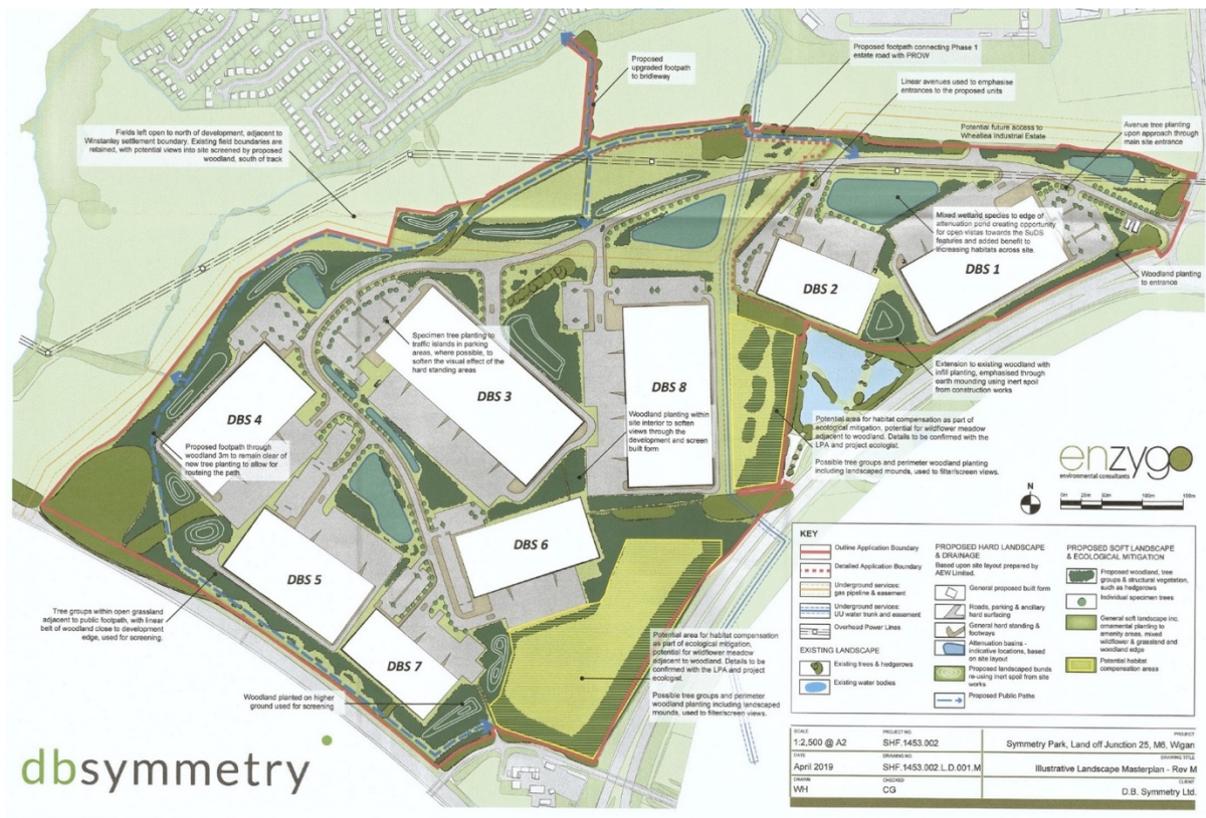


Figure 6 – Outline landscaping proposals for Symmetry Park.

Core habitat losses within the detailed application site boundary mainly comprised tall ruderal, arable grassland and ephemeral habitat with some additional loss of species-poor semi-improved grassland. Grassland made up 94% of the overall habitat loss.

The core habitats to be lost on the outline application site were similarly dominated by species-poor grassland and ephemeral habitats of limited habitat distinctiveness and grassland (86% of the overall losses), although there were areas of plantation woodland and scrub within the site.

For both applications, as the habitat that was lost was low-quality grassland, this could be replaced by any habitat type to meet Biodiversity Net Gain requirements. However, a decision was made to replace the loss with grassland of a broadly similar habitat type.

Considering the new landscaping planned as part of the detailed element of the application, it was calculated that the development proposals would result in a loss of biodiversity. To achieve a 10% Net Biodiversity Gain would require off-site habitat provision.

Taking into account both the detailed application and the outline application, it was calculated that 72 Biodiversity Units would be required to achieve a 10% Net Gain.

Project Challenges

The developer did not own or manage any land in the area where habitat creation/enhancement could be achieved, and there are no nearby compensation sites available from which the developer could buy credits. It was therefore proposed that the developer should provide a financial contribution to Wigan Council (via a S106 agreement) to be spent on habitat creation and enhancements in the area, and that subsequently the habitat creation and enhancement would be delivered by the Council and its partners.

To calculate the sum of money required for offsetting contribution, the Rayment et al. (consulting report for Defra) 2011 biodiversity offsetting costs model was used as a starting point. The costs of the biodiversity offsets were estimated, taking into account local habitat creation and restoration costs (based in part on estimates from the UK Biodiversity Action Plan costings), land purchase costs (based on current prices for local agricultural land), habitat management costs, with an additional allowance made for administrative, transaction and regulatory costs.

For the purposes of the S106 agreement, details of where and how the money would be spent were needed. Wigan Council considered its own land holdings in the area and proposed that land within the Wigan Greenheart area could benefit from habitat creation and enhancement. The Wigan Greenheart is a local network of habitats and publicly accessible greenspace, much of it is restored land from former coal mining and industrial activity, largely owned and managed by the Council and its partners, including the Lancashire Wildlife Trust. Although the sites proposed for habitat creation were some miles from the application site, they are within the Borough of Wigan and within priority areas for green infrastructure improvements as identified by the Council.

Project Outcome and Client Benefits

The proposed habitats to be created and/or enhanced were not commensurate with the habitat types to be lost to the development; instead, it was proposed that higher quality priority habitats within a core area of a Regional Ecological Network (the 'Carbon Landscape' Area) would be created and managed.

Habitats to be created and enhanced included reedbeds, marshy grassland, fen and species-rich grassland. The area of habitats to be created, enhanced and managed are greater than the area lost and are part of a long-term management plan agreed with Wigan Council. While the total area of habitats created would be less than the area of habitat lost, the habitats to be created were regarded as being more valuable.

The cost of compensation was identified based on the specific offset sites and the estimated cost of creating and managing these habitats was included within the S106 agreement. The Biodiversity Net Gain calculation for the compensation site was not run for this project and the assessment was subjective. In future, calculations of the compensation sites will be expected as part of the planning application.

GMEU, on behalf of the Council, accepted that although it was not meeting the original ambition to replace the grassland with grassland habitats the proposals would represent a Net Gain in Biodiversity.

Lessons Learned

This study demonstrates some of the difficulties in running an assessment at both outline and final application stages at the same time. The key lessons learned from this study are as follows:

- To make sure that the Biodiversity Net Gain requirement from the local planning authority is clear at the outset of the development process. This will make planning simpler and decrease associated costs.
- At the outline application stage, it would help to make a set of assumptions about the amount of green space the development will create instead of assuming it will all be lost. This will decrease the compensation requirement and will be a more accurate assessment of the application.
- The requirement for delivering the same habitat type as is affected by the project is important but is only necessary for the priority habitats or habitats of principle importance. This flexibility for the other habitats can make it easier to deliver the required compensation.
- Enhancing habitats onsite or offsite can be a valuable and cost-effective way of delivering the gains needed to meet a 10% target.
- Use the Biodiversity 2.0 metric throughout the development process. Using the metric enables developers to quantify biodiversity value associated with landscaping of the site. This will also help clarify what is required and what the compensation sites (including the offsite habitat enhancement) are providing.
- If the biodiversity metric is used for the offsite work as well as onsite, the costs for the compensation areas can be agreed, ensuring that the S106 agreement is identifying the appropriate area and type of habitat to be enhanced or created.

- The options for setting up offsite biodiversity work should be set out clearly and understood by all involved. Ideally several of these options, including the offsite work being provided by the local planning authority, should be set up and available to the developer so that they can select the best option for their development. It is important to have a transparent methodology for working out the required financial contributions for offsite habitat creation where the applicant does not own or control the land. This is important to make delivering a 10% net gain deliverable for all projects.
- Biodiversity Net Gain requires ecologists to be involved in the design and construction of a development. Ecologists will be needed to support the developer and the local authority.