

Greater Manchester Combined Authority

Date: 12 December 2025

Subject: Off-Site Biodiversity Net Gain Responsible Body Service

Report of: Councillor Tom Ross, Portfolio Lead for Green City Region and Sue Johnson, Portfolio Lead Chief Executive for the Greater Manchester Green City Region

Purpose of Report

This report outlines a proposal for GMCA to establish an Off-Site Biodiversity Net Gain (BNG) Responsible Body Service for the Greater Manchester local authorities. The service is designed to help the GM local authorities meet the Environment Act 2021 requirement for a 10% biodiversity uplift in new developments, particularly when this cannot be achieved on-site.

The new Responsible Body status will enable GMCA to enter Conservation Covenants with all GM local authorities, facilitating the registration of habitat banks and the sale of BNG units locally, raising revenue for the local authority. The service will operate on a cost-neutral basis, funded through administrative fees and a subscription model.

Recommendations

The GMCA is requested to:

1. Note the background to the Responsible Body Service.
2. Approve the commissioning of the Responsible Body Service.
3. Delegate authority to the Managing Director of GMCA in consultation with the Group Chief Finance Officer and Group Solicitor and Monitoring Officer to enter into agreements with the Local Authorities as described in Clause 5.2

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Equalities Impact, Carbon and Sustainability Assessment:

Recommendation - Key points for decision-makers		
<p>The GMCA is recommended to note that the co-benefits decision tool is positive for the draft strategy. There are particular positives for health, resilience and adaptation, carbon, nature and the environment.</p>		
Impacts Questionnaire		
Impact Indicator	Result	Justification/Mitigation
Equality and Inclusion	G	<p>Biodiversity enhancements can benefit all age groups by enhancing access to green spaces, which is particularly beneficial for young children and the elderly.</p> <p>Biodiversity enhancements can also benefit other people or groups particularly those that are socially and economically disadvantaged.</p> <p>Biodiversity enhancements can also benefit local people's access to public services by linking up with Live Well and green social prescribing activities.</p> <p>Biodiversity enhancements can also be delivered in partnership with the VCFE community.</p> <p>Biodiversity enhancements can also benefit community cohesion by enhancing access to green spaces.</p>
Health	G	<p>Biodiversity enhancements can positively affect the physical health of GM residents by enhancing access to green spaces.</p> <p>Biodiversity enhancements can also positively affect the mental health and wellbeing of GM residents by enhancing access to green spaces.</p> <p>Biodiversity enhancements can also positively affect residents levels of physical activity by enhancing access to green spaces.</p> <p>Biodiversity enhancements can also positively affect levels of social isolation, by enhancing access to green spaces, supporting both physical and mental well-being.</p> <p>Biodiversity enhancements can also positively affect resident access to healthcare services by linking up with Live Well and green social prescribing activities.</p> <p>Biodiversity Net Gain proposals are unlikely to directly include local food growing opportunities but may be linked to wider proposals.</p>
Resilience and Adaptation	G	<p>Biodiversity enhancements can support a range of co-benefits including improved climateresilience, flood risk management across the 10 local authorities.</p> <p>Biodiversity enhancements can also support a range of co-benefits including enabling individuals, communities and businesses.</p> <p>Biodiversity enhancements can also support a range of co-benefits including improving current levels of vulnerability both for people and the environment.</p> <p>Biodiversity enhancements can also support a range of co-benefits including making our communities safer and stronger.</p> <p>Biodiversity enhancements can also support a range of co-benefits including improving the quality and provision of green infrastructure.</p>
Housing		
Economy	G	<p>Greater Manchester's natural assets provide over £1bn of benefits each year to Greater Manchester, which would increase with further enhancements.</p> <p>Further enhancement in the natural environment is likely to result job opportunities within the sector.</p> <p>Further enhancement in the natural environment is likely to provide an attractive and high-quality city-region where businesses want to invest and attractive place to live and work for employees.</p> <p>Greater knowledge and integration into decision making of the economic benefits of GM's natural assets will result in more sustainable use of these assets in the future</p> <p>Enhancing our natural environment will provide an attractive and high-quality city-region where businesses want to invest and attractive place to live and work for employees.</p>
Mobility and Connectivity		
Carbon, Nature and Environment	G	<p>GM's natural environment provides £38m in air quality benefits each year, which would increase with further enhancement to the natural environment</p> <p>GM's natural environment provides £19m in water quality benefits each year, which would increase with further enhancement to the natural environment</p> <p>GM's natural environment reduces noise pollution, benefiting communities.</p> <p>GM's natural environment provides £3m in carbon storage each year, which would increase with further enhancement to the natural environment</p> <p>GM's natural environment provides £174m in amenity benefits each year, which would increase with further enhancement to the natural environment</p> <p>This strategy sets out targets, priorities and actions to help everyone in the city-region to respond to the biodiversity emergency.</p> <p>This strategy sets out targets, priorities and actions which would help increase local community's access to greenspace.</p> <p>GM's natural environment provides £3m in carbon storage each year, which would increase with further enhancement to the natural environment</p>
Consumption and Production		
Contribution to achieving the GM Carbon Neutral 2038 target		<p>This proposal will have a positive contribution to achieving the Greater Manchester carbon Neutral 2038 target by encouraging actions that would help sequester carbon, including peatland restoration and tree planting.</p>
Further Assessment(s): Carbon Assessment		
G	Positive impacts overall, whether long or short term.	
A	Mix of positive and negative impacts. Trade-offs to consider.	
R	Mostly negative, with at least one positive aspect. Trade-offs to consider.	
RR	Negative impacts overall.	

Carbon Assessment

Overall Score				
Buildings	Result	Justification/Mitigation		
New Build residential	N/A			
Residential building(s) renovation/maintenance	N/A			
New build non-residential (including public) buildings	N/A			
Transport				
Active travel and public transport	N/A			
Roads, Parking and Vehicle Access	N/A			
Access to amenities	N/A			
Vehicle procurement	N/A			
Land Use				
Land use		<p>The proposals will support the creation of new habitat and enhancement of existing habitats.</p> <p>The proposals support the delivery of biodiversity net gain but do not require an impact assessment themselves.</p> <p>The proposals will support the creation of new habitat and enhancement of existing habitats.</p> <p>The proposals will encourage the conservation of particularly vulnerable local species.</p>		
No associated carbon impacts expected.	High standard in terms of practice and awareness on carbon.	Mostly best practice with a good level of awareness on carbon.	Partially meets best practice/ awareness, significant room to improve.	Not best practice and/ or insufficient awareness of carbon impacts.

Risk Management

The Responsible Body Service presents some risks for both GMCA and the local authorities, which have been carefully assessed and mitigated through the development of the proposals.

Capacity

One key challenge for GMCA is the availability of ecological expertise, as there is a limited supply of trained ecologists due to increasing pressures in the sector. To address this, it is proposed that ecological support will be provided by the Greater Manchester Ecology Unit (GMEU), 'hosted' by Tameside.

There is also a risk to the local authorities that potential habitat bank sites may not be suitable for BNG offsetting due to habitat type limitations or size constraints. Early engagement with the 10 local authorities has also taken place to develop a strong pipeline of viable sites and identify any issues in their supply.

Legal

Other risks to GMCA include changes to BNG legislation, potential conflicts of interest, and financial risks associated with phased developer payments. These are being managed through regular legislative monitoring, strong legal frameworks, and upfront payments where appropriate.

Financial

The cost of monitoring habitat bank sites over a 30-year timeframe poses a challenge for both GMCA and the local authorities. Detailed cost analysis and contingency funding are incorporated into budget planning. The proposed charging model for local authorities and GMCA will also be kept under review once the Responsible Body Service is operational and refreshed on an annual basis if required.

By implementing these mitigations, GMCA aims to ensure a robust and financially sustainable Responsible Body Service that accelerates biodiversity gain across the region.

To support the development of the Responsible Body Service GMCA, has already committed resources over the past 12 months totalling over £50,000 (including policy, legal and financial officer time and options appraisal analysis).

Legal Considerations

GMCA's legal team will support compliance with all statutory requirements under the Environment Act 2021, including the drafting and signing of Conservation Covenants with the participating local authorities as well as addressing any potential breaches and enforcement if required. This service will initially be provided by Manchester City Council (MCC)

A separate agreement will be signed between GMCA and each of the participating local authorities, setting out the overall terms of the Responsible Body Service to be provided by GMCA to the authority.

The Conservation Covenants for each Habitat Bank site will govern the relationship between GMCA and the relevant local authority for each site and will form part of the documentation required to register each site as a habitat bank with DEFRA.

Financial Consequences – Revenue

The Responsible Body Service will operate on a cost-neutral basis, with all costs recouped through an administrative fee that will be included by local authorities in the pricing of BNG units by them. This ensures the financial sustainability of the Responsible Body Service without placing additional strain on the authority's budgets.

The management of the Responsible Service will be included in the GMCA Environment Directorate. An additional officer post (part time initially) will be required to meet the demand of this Responsible Body Service and will be funded as above.

An annual review of the charging model will ensure that it remains competitive and accurately reflects the costs of delivering the Responsible Body Service. Adjustments will be made if necessary to account for changes in inflation, demand changes, or unforeseen costs.

By structuring the Responsible Body Service this way, the Combined Authority ensures that BNG is delivered in a financially sustainable manner, enabling local authorities to secure biodiversity investment while maintaining fiscal responsibility.

Financial Consequences – Capital

There are no financial consequences for GMCA capital budgets.

Number of attachments to the report:

- Annex A: Rationale for recommended approach
- Annex B: Off-site BNG Responsible Body Service Process
- Annex C: Financial model
- Annex D: Responsible Body Service Project Management and Governance

Comments/recommendations from Overview & Scrutiny Committee

N/A

Background Papers

- [Biodiversity Net Gain Guidance for Planners and Applicants 2024](#)
- [Biodiversity Net Gain in Greater Manchester - Assessment of offsite need for and supply of biodiversity units 2024](#)
- [Greater Manchester Habitat Bank Verification and Auditing Guidance 2024](#)
- [Greater Manchester State of Nature Report 2024](#)
- [Biodiversity Net Gain Strategic Significance and the Greater Manchester Local Nature Recovery Strategy 2025](#)
- [Greater Manchester Local Nature Recovery Strategy 2025](#)

Previous GMCA papers

- [GMCA Paper March 2022 - Biodiversity Net Gain in Greater Manchester](#)
- [GMCA Paper March 2022 – Biodiversity Emergency](#)
- [GMCA Paper March 2024 – Progress in tackling the Biodiversity Emergency in Greater Manchester](#)
- [GMCA Paper August 2025 – Publication of the Greater Manchester Local Nature Recovery Strategy](#)

Tracking/ Process

Does this report relate to a major strategic decision, as set out in the GMCA Constitution

Yes

Exemption from call in

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?

No

Bee Network Committee

N/A

Overview and Scrutiny Committee

N/A

1. Background

- 1.1 Biodiversity Net Gain (BNG) became mandatory in 2024, requiring a 10% biodiversity uplift for all eligible new developments across England. If this uplift cannot be delivered within the boundaries of the development site itself, the gain must be compensated for and delivered elsewhere (off-site BNG).
- 1.2 The off-site BNG system is market driven, with developers able to choose where and from whom to purchase off-site BNG units. There are limited registered habitat banks (sites that generate units) in Greater Manchester able to meet the increasing demand from developers. The Greater Manchester Ecology Unit (GMEU) is receiving daily requests from developers who need to purchase off-site biodiversity units but cannot find these locally.
- 1.3 These issues have the potential to stall developments where sufficient units cannot be sourced, or impact on viability if units are available but prohibitively expensive. If units are not available locally, this will lead to benefits of off-site BNG being delivered elsewhere in the country. At the same time, the cost of development in Greater Manchester could increase.
- 1.4 The proposals in this report aimed at tackling these issues will contribute to delivery of the Greater Manchester Strategy, particularly “Creating a Greener Future for Everyone” and “Making Greater Manchester a Great Place to do Business.”

2. Challenges for authorities in bringing forward habitat banks

- 2.1 One way to reduce these negative impacts is for local authorities to bring forward their own habitat banks to meet this increasing demand.
- 2.2 All 10 Greater Manchester local authorities are taking steps to make their own land available for off-site BNG.
- 2.3 To be able to sell off-site BNG units, habitat banks need to be officially registered on Natural England’s national register. In order to be registered, habitat banks require a 30-year legal agreement to secure the site, via:
 - Either a S106 agreement with a local authority – however, local authorities are unable to enter agreements with themselves unless they lease land, create a Special Purpose Vehicle or delegate their planning enforcement function to a neighbouring local authority (all prohibitive).

- Or entering a Conservation Covenant with a Responsible Body – these bodies must apply to and be approved by government to create, manage, and monitor Conservation Covenants, which are contracts between the Responsible Body and respective landowner (including local authorities).

2.4 Signing a Conservation Covenant with a Responsible Body is therefore the best route for a local authority to secure its site(s). There are 33 Responsible Bodies registered with Defra, including 13 local authorities across England. Those local authorities that have applied for Responsible Body status have done so to facilitate habitat banks coming forward in local authorities within their own area (i.e. County Councils) or with neighbouring local authorities. There are a limited number of private providers that are operating in this space and fees charged by them are known to be prohibitively high for the local authorities.

3. Providing a solution: GMCA's Responsible Body Status

3.1 Given the lack of Responsible Body options for local authorities in Greater Manchester, GMCA was asked by the GM local authorities, in 2024, to apply to Defra to become a Responsible Body. The application was approved in December 2024 and provides GMCA with the legal authority to enter Conservation Covenants, including with local authorities, to enable them to secure their habitat banks for off-site BNG.

3.2 GMCA has not yet commissioned this service, due to the need to:

- Carry out an options appraisal on whether and how the service could be commissioned.
- Based on the preferred option from that appraisal, design the service, including its financing, resourcing and legal implications.
- At the same time, work with the local authorities to support them taking their habitat banks through the required preceding steps before entering into a Conservation Covenant.

3.3 A sufficient cohort of GM local authorities have now progressed their habitat banks and level of commitment to a point whereby GMCA can make a decision on commissioning its Responsible Body Service, as follows:

- 8 local authorities (Bolton, Bury, Oldham, Salford, Stockport, Tameside, Trafford and Wigan), have confirmed that they are interested in signing up to the

Responsible Body Service subject to costs, formal decisions required internally and other local authorities signing up.

- Of the 8 local authorities that have confirmed, there is an identified pipeline of habitat banks (c. 30) which they are looking to bring forward over the next 3-5 years.
- 2 local authorities have confirmed they are unable to sign up to the Responsible Body Service now but would like to review their position in 2026.

4. Design of the Responsible Body Service

4.1 Following a detailed review of the options, the preferred solution was that GMCA takes forward the Responsible Body Service for the 10 Greater Manchester local authorities and TfGM in the first instance. This minimises the financial risk and legal liability to GMCA and, once established, the service can be reviewed to explore opportunities to include other partners such as affiliate AGMA local authorities in the future. A detailed rationale for the recommended option is included in Annex A.

4.2 The preferred option brings a range of benefits, including:

- **Environmental:** Supports delivery of the Greater Manchester Local Nature Recovery Strategy, launched in September 2025.
- **Financial:** Enables the participating local authorities to generate revenue from the sale of biodiversity units to carry out the enhancements required and manage them for 30 years. Based on an estimated £30,000 per unit, there is potential to generate £1.2m–£4.5m in unit sales per site (depending on the number of units being brought forward).
- **Timeline:** Service launch is planned January 2026; evaluation in 2028.
- **Political:** Streamlined route for local authorities to meet BNG obligations.
- **Commercial:** Competitive alternative to private providers for local authority partners.

4.3 GMCA officers have been working with estate colleagues separately to identify opportunities for biodiversity improvements on all GMCA estate including GMFRS, GMP and waste management sites. No off-site BNG sites are being brought forward on GMCA estate specifically for off-site BNG at the present time. If sites do come forward in the future, as the estate is legally owned by GMCA, the GMCA would not be able to enter into a Conservation Covenant with itself. GMCA would need to look at other

options including approaching another Responsible Body or signing a S106 agreement with the relevant local authority.

4.4 The Responsible Body Service has been designed in conjunction with GMEU, with support from the 10 Greater Manchester local authorities. Its aim is to deliver the functions required of a Responsible Body (Annex B) according to the following principles:

- Roles and Responsibilities – providing clarity on respective roles and responsibilities for those organisations involved in the delivery of the service.
- Financial model – providing clarity on the cost of the service up-front and ensuring costs incurred are recovered on a full cost recovery basis.
- Legal structures – providing a robust service that enables GMCA and local authorities to discharge their respective legal obligations.
- Governance – providing robust governance arrangements to oversee delivery of the service and manage risks.
- Resourcing – providing certainty of resource to deliver the service within each organisation.

Roles and Responsibilities:

4.5 There are three main aspects to the service – validation, verification and auditing – which require different activities to be carried out. These activities require different expertise – including legal and ecological input – under the oversight of GMCA as the Responsible Body.

4.6 The management of the Responsible Body Service will be included in GMCA's Environment Directorate, with a dedicated GMCA Project Manager post (part time) to be in place to meet demand, particularly the validation and verification stages. GMCA will commission GMEU to deliver key aspects of the service over the required 30-year duration of the Conversation Covenant.

Financial model

4.7 The financial model combines two elements – a fixed subscription charge and variable charges calculated on a site-by-site basis.

Fixed costs – subscription:

4.8 This element requires local authorities to commit to a minimum subscription of 3 years covering the period during which habitat banks are expected to come forward for validation and verification.

4.9 Local authorities will pay a consistent fee for each year of the subscription period, equally sharing the costs of a dedicated GMCA Project Manager post. The cost of this post is fixed, and the amount each authority pays will depend on the number of authorities that sign up to the service. The more authorities that engage, the less the cost per authority.

Variable costs – site-by-site:

4.10 The costs for the subscription service do not include variable GMCA auditing and advisory panel costs (after the 3-year subscription period ends) and third-party costs (including GMEU and external legal costs) of verification and auditing which are additional and spread over the 30-year period. These costs will vary depending on the complexity of a specific site. However, indicative costs have been provided based on benchmarking with other local authorities.

4.11 The Responsible Body Service will operate on a cost-neutral basis, with all costs including the subscription fee and third party costs recouped through an annual recharge back to the local authorities which they will recoup as part of the pricing of the BNG units they sell. This ensures the financial sustainability of the Responsible Body Service without placing additional strains on GMCA or local authority budgets.

4.12 A breakdown of indicative costs, informed by a detailed costing model, has been shared with local authority leads and is set out in Annex C.

Legal structures

4.13 There are two main agreements that will underpin provision of the service by GMCA to local authorities:

- An agreement between GMCA and each local authority setting out the overall terms of the Responsible Body Service to be provided by GMCA to the authority.
- A Conservation Covenant between GMCA (in its role as the Responsible Body) and local authority (as a landowner) to secure their habitat banks for conservation for the required 30-year period. Depending on how authorities approach delivery of their habitat banks there may be multiple Conservation Covenants entered into, potentially on a site-by-site basis.

4.14 In combination, these agreements will set out the roles and responsibilities of GMCA and local authority in the delivery of off-site BNG on the local authority's land. The GMCA, as Responsible Body, will provide the auditing and enforcement functions required to allow the land to be registered as off-site BNG with DEFRA, while the local

authority will commit to carrying out the habitat enhancements works on the land within an agreed framework.

Governance

- 4.15 A structured governance framework will be put in place to oversee decision-making, risk management, and service delivery (Annex D).
- 4.16 It is proposed that a Delivery Group will meet on a quarterly basis each year and receive annual reports on the habitat banks as part of the reporting process to government. This will include a summary relating to all habitat banks, onsite delivery and any potential monitoring issues.
- 4.17 Any decisions taken in relation to enforcement will be taken by the GMCA Group Solicitor and Monitoring Officer.

GMCA Resourcing

- 4.18 In order to deliver the service and meet its objectives, GMCA has determined that, for an initial period covering the validation and verification stages (up to 3 years), it will appoint a dedicated Project Manager with its Environment Directorate (part time based on initial demand). This will be kept under review as there may be a need for additional recruitment to support the Responsible Body Service if it grows.

5. Subsequent decisions required

Decisions for local authorities

- 5.1 Local authorities will need to approve entering into an agreement with GMCA, to avail themselves of the service. The agreement will include details of costs charged back to the local authorities and how variable costs are addressed to ensure the Responsible Body Service is financial sustainability without placing additional strains on the on GMCA or local authority budgets.

GMCA decision to sign agreements

- 5.2 Once local authorities have signed their respective agreements, GMCA will then need to sign them it. GMCA is likely to sign these in one tranche when authorities have confirmed they are signing up to the service (by signing an agreement) or that they do not wish to at this stage, for reasons set out below.

6. Next steps

6.1 The milestones and anticipated timeline for the Responsible Body Service are as follows:

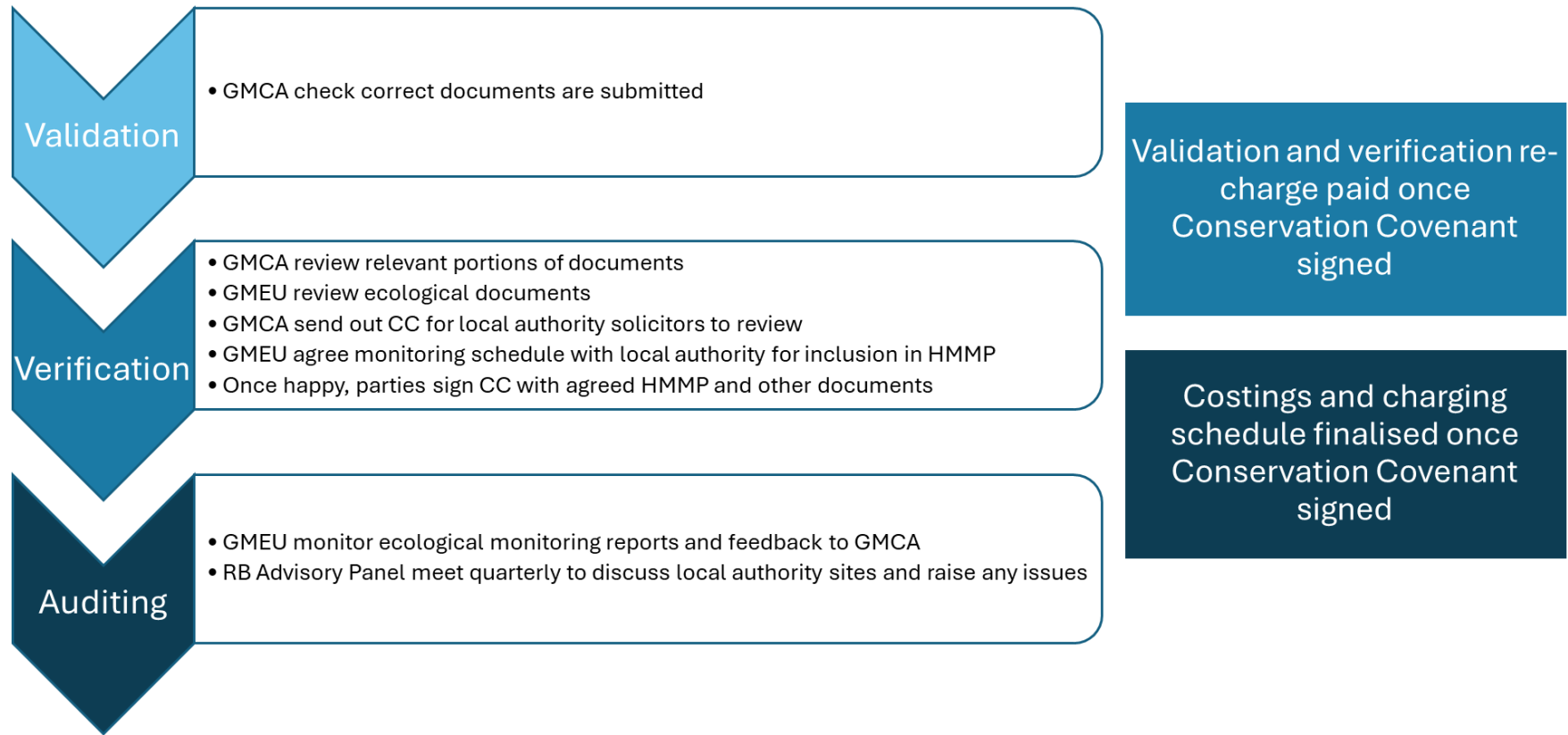
Ongoing	Continued collaboration with local authorities to prepare habitat banks for registration and support them through their own internal decision making and approval process.
November 2025	Contents of agreement drawn up and agreed between GMCA and local authorities.
December 2025	Agreement able to be signed by local authorities.
January 2026	First Conservation Covenants able to be signed.
2027 onwards	Commencement of ongoing monitoring and oversight role for 30+ years.
2028	Initial service evaluation and review to assess effectiveness and potential extension of subscription service.

Annex A: Rationale for recommended approach

Theme	Rationale
Environmental	<ul style="list-style-type: none"> • The Responsible Body Service can help facilitate wider environmental/ecological objectives such as the LNRS and 5-Year Environment Plan. • The service positions GMCA as facilitators of nature and green space improvements within strategic areas within Greater Manchester.
Political	<ul style="list-style-type: none"> • Exact demand for the service is not known. However, engagement with the local authorities over the proposed service has been positive. • Several local authorities have indicated that this may be the only viable option, and local authorities require support to bring more habitat banks forward which this service can provide.
Financial	<ul style="list-style-type: none"> • Offering the service to local authorities will likely mean that GMCA can meet demand through a dedicated post based on an estimated 7 supply habitat banks coming forward over 15 years. • The majority of the resource implications for delivering the service sit with GMEU, and this is an offering they are already providing for both on-site BNG and off-site signed through a S106 with a local authority. Therefore, this GMCA service is low risk for GMEU and will help further build team capacity.
Commercial	<ul style="list-style-type: none"> • GMCA and Greater Manchester Environment Trust (GMET) proposed services differ, allowing GMCA to fill a gap in delivery with no real overlap. GMCA is likely to be competitive on price compared to private providers, especially for local authorities.
Enforcement	<ul style="list-style-type: none"> • Different levels of risk will be present based on working with Greater Manchester local authorities, local authorities outside Greater Manchester and private landowners. Working with local authorities in the first instance limits GMCA's exposure to risk. • Cost recovery and indemnity provisions have been factored into the Conservation Covenant, which allows GMCA to meet its fiduciary duties and limit the costs risk of enforcement action whilst maintaining an acceptable approach to enforcement with the local authorities. • Bonds, which are likely to be required for private landowners, are not considered necessary for local authorities.

Annex B: Off-site BNG Responsible Body Service Process

The Off-site BNG Responsible Body Service comprises three key stages; validation, verification and auditing over a 30 year period, within which there are roles for GMCA as the Responsible Body and the Greater Manchester Ecology Unit (hosted for AGMA by Tameside). These are summarised in the two diagrams below.



Responsible Body process overview



Annex C: Financial model

A breakdown of the Responsible Body Service costs is set out below which have been informed by benchmarking with other local authorities providing similar validation, verification and auditing services and include inflation.

Subscription costs (Fixed)

Based on the 8 local authorities that have already expressed an interest in signing up to the Responsible Body Service and looking at bringing habitat banks over the next 3 years for validation and verification the GMCA subscription service fixed costs are as follows:

GMCA Subscription fee 2026	GMCA Subscription fee 2027	GMCA Subscription fee 2028
£5,581	£5,748	£5,921

Third party plus GMCA auditing and advisory panel costs (Variable)

All third party variable costs plus GMCA auditing and advisory panel costs (after the 3 year subscription period ends) are in addition to the subscription service and will be charged on a site by site basis based on level of complexity. The definition of complexity and indicative costs by complexity are set out below.

Complexity of site	Low	Moderate	High
Definition	Up to 40 biodiversity units generated AND No watercourses present	Up to 80 biodiversity units generated OR Less than 40 units but presence of a watercourse in metric	Up to 150 biodiversity units generated* *for habitat banks generating >150 units, or with particularly complex land-use contexts, a bespoke cost may need to be agreed.

		CPI		3.0%	
		Low Complexity Site	Moderate Complexity Site	High Complexity Site	
Variable Cost - Verification - GMEU	0	£ 797.50	£ 1,196.25	£ 1,595.00	
Variable Cost - Verification - Shared Legal Services	0	£ 5,000.00	£ 5,000.00	£ 5,000.00	
Variable Cost - Auditing - GMEU - Year 1	1	£ 868.36	£ 1,220.40	£ 1,642.85	
Variable Cost - Auditing - GMCA - Year 1	1				
Variable Cost - Auditing - GMEU - Year 3	3	£ 921.25	£ 1,294.73	£ 1,742.90	
Variable Cost - Auditing - GMCA - Year 3	3	£ 487.69	£ 731.53	£ 1,219.21	
Variable Cost - Auditing - GMEU - Year 5	5	£ 977.35	£ 1,373.57	£ 1,849.04	
Variable Cost - Auditing - GMCA - Year 5	5	£ 517.39	£ 776.08	£ 1,293.46	
Variable Cost - Auditing - GMEU - Year 10	10	£ 1,133.02	£ 1,592.35	£ 2,143.55	
Variable Cost - Auditing - GMCA - Year 10	10	£ 599.79	£ 899.69	£ 1,499.48	
Variable Cost - Auditing - GMEU - Year 20	20	£ 1,522.68	£ 2,139.98	£ 2,880.75	
Variable Cost - Auditing - GMCA - Year 20	20	£ 806.07	£ 1,209.11	£ 2,015.18	
Variable Cost - Auditing - GMEU - Year 25	25	£ 1,765.20	£ 2,480.83	£ 3,339.58	
Variable Cost - Auditing - GMCA - Year 25	25	£ 934.46	£ 1,401.68	£ 2,336.14	
Variable Cost - Auditing - GMEU - Year 30	30	£ 2,046.36	£ 2,875.96	£ 3,871.48	
Variable Cost - Auditing - GMCA - Year 30	30	£ 1,083.29	£ 1,624.94	£ 2,708.23	
Semi-variable Cost - Advisory Group Delivery - GMCA	30	£ 1,717.42	£ 1,717.42	£ 1,717.42	
Semi-variable Cost - Advisory Group Delivery - GMEU	30	£ 665.27	£ 665.27	£ 665.27	
Semi-variable Cost - Advisory Group Delivery - Legal	30	£ 1,548.48	£ 1,548.48	£ 1,548.48	
		£ 23,391.58	£ 29,748.27	£ 39,068.02	

Factors impacting final cost

The following factors may impact the recommended costs associated with the Responsible Body Service:

- Number of local authorities signed up.
- Complexity of the site – as per the process costs (see above).
- Site delivery context. Phased habitat banks may require more monitoring, subsequently increasing the auditing costs. This is because the 30-year monitoring period will start upon completion of habitat works, so a phased site will have multiple triggers for 30-years of monitoring, meaning an overall greater than 30 years auditing schedule for GMCA & GMEU.
- The variable costs for GMCA auditing and advisory panel management over the 30 years and third party costs for GMEU and Legal Services are an indicative fee and may be scaled up or down depending on the complexity of the specific case. These will be charged at cost.
- Costs for any enforcement breaches that require time from GMCA, GMEU and Legal Services to address. verification and auditing.
- Additional costs including contaminated land and archaeological consultations as well as local land registration charges.

Annex D: Responsible Body Service Project Management and Governance

Delivery of the Responsible Body Service requires day to day tactical project management and wider governance process to ensure sign off and ability for the GMCA to take wider decisions relating to the Responsible Body Service work. It is proposed that these services will be provided by GMCA, GMEU and Legal Services through:

1. A regular tactical project management group, the Responsible Body Service Delivery Group, and
2. Group Leadership Team.

The operation and membership of these two groups is set out below:

Responsible Body Delivery Group

As discussed above a Responsible Body Service Delivery Group will be established to oversee the day-to-day delivery and management of the work of the Responsible Body Service with single points of contact established. It is proposed that this group will meet quarterly for 2 hours. In doing so this group will seek to:

- Steer the progress of the Responsible Body Service
- Monitor progress and difficulties encountered with the Responsible Body Service
- Identify any potential conflicts arising from the role as Responsible Body Service, propose mitigation and escalate where appropriate.
- Manage any proposed changes to the manner in which the Responsible Body Service is run
- Manage the time spent on the Responsible Body Service
- Manage the financial spend/invoices during the previous period
- Act as the technical quality review panel for the work and outputs. The Responsible Body Service Delivery Group will review all draft reports produced by sub-contractors, prior to acceptance.
- Seek to resolve difference and disputes arising between the partners.
- Provide regular quarterly reports to the Responsible Body Service Governance Group (Director Level) to outline key risks and issues for further agreement.
- With any actions to be unanimously agreed by each Party.

Responsible Body Service Delivery Group members:

- GMCA Project Manager (Environment Team)
- GMEU Principal Ecologist
- GMCA Legal

Group Leadership Team

The Responsible Authority Delivery Group will report progress, risks and decision items to the Group Leadership Team (Directors) Group on a quarterly basis. If needed the Responsible Authority Delivery Group will request any extraordinary meetings (physical or virtual) of the Group Leadership Team as required. With any actions to be unanimously agreed by each Party. Group Leadership Team meets weekly.

Group Leadership Team members include:

- Group Chief Executive, GMCA
- Group Deputy Chief Executive, GMCA
- Group Chief Finance Officer, GMCA
- Group Solicitor & Monitoring Officer, GMCA
- Director of Environment, GMCA
- Director of Place, GMCA

Any differences and disputes arising between the partners can be escalated through to the GMCA Wider Leadership Team and then onto the GMCA.

