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TOTAL ECOLOGY
innovative ecological consultants

Biodiversity Metrics

Egremont

December 2025

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Quality Control

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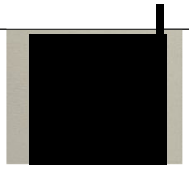
Reviewed by	Karen Devenney (Principal Ecologist)	MSc MCIEEM		12/01/2024	1
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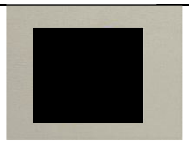
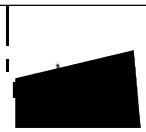
Reviewed by	Karen Devenney (Principal Ecologist)	MSc MCIEEM		04/03/2025	3
Issued by	Laura Thompson (Principal Ecologist)	BSc (Hons) ACIEEM		04/03/2025	3
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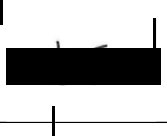
Issued by	Laura Thompson (Principal Ecologist)	BSc (Hons) MCIEEM		16/12/2025	4

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Biodiversity Metrics

Proposed Aldi, Egremont

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1.0 EXECUTIVE SUMMARY

Total Ecology was commissioned by Avison Young in December 2023 to undertake a Biodiversity Net Gain (BNG) assessment of a former garage site in Egremont. The approximate National Grid Reference for the centre of the site is **NY 01176 11081.**

A BNG assessment is required prior to proposals to create a new Aldi food store with associated soft landscaping.

Most of the proposals for this site will be used as off-site habitat units for a similar development in Whitehaven. This calculation shows only those relevant to achieving net gain for this project.

The Biodiversity Metric calculation shows the following:

On-site baseline:	On-site proposals:
• 0.08 habitat units • 0.00 hedgerow units • 0.00 watercourse units	• 0.09 habitat units • 0.00 hedgerow units • 0.00 watercourse units

This results in 11.84% gain of habitat. The trading rules are not satisfied by the current plans as there is a loss of bramble scrub which is not adequately replaced by mixed scrub or habitats of a higher distinctiveness.

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2.0 INTRODUCTION

2.1 Background

Total Ecology was commissioned by Avison Young in December 2023 to undertake a Biodiversity Net Gain (BNG) assessment of a former garage site in Egremont. The approximate National Grid Reference for the centre of the site is **NY 01176 11081**.

A BNG assessment is required prior to proposals to create a new Aldi food store with associated soft landscaping.

A Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) were carried out by Total Ecology in November 2023 and the report for these surveys should be read in conjunction with this report (Total Ecology, 2023).

The project is currently in the final stage and the metrics within this report are likely to be final.

2.2 Site Description

The site is located within the east of the Cumbrian town of Egremont; the west is therefore predominantly residential with some open amenity grassland as part of West Lakes Academy. The site is directly bounded by the busy A595 road, and small areas of linear woodland. More substantial green space is present further east where the River Ehen flows surrounded by woodland. Outside of the town the area is dominated by pasture. The west coast of England is approximately 4.5km west of site.

2.3 Objectives

The objective of this report is to show the site baseline biodiversity, in habitat units, and demonstrate the gain/ loss in biodiversity brought about by site proposals.

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3.0 PLANNING POLICY AND LEGISLATION

The following planning policies and legislation are relevant to BNG and this report. Other legislation is in place to protect various habitats and species within the UK (detailed in the PEA & PRA Report):

- Town and Country Planning Act 1990;
- The Hedgerows Regulations 1997;
- Environment Act 2021; and
- The Biodiversity Gain Site Register Regulations 2024.

3.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Section 11 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity. Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on:

- Landscape;
- Biodiversity, ecosystems and green infrastructure; and
- Brownfield land, soils and agricultural land.

3.2 UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (UK BAP) was succeeded in 2012 by the 'UK Post-2010 Biodiversity Framework' which demonstrates a whole-environment strategy on how the UK contributes to achieving the Convention on Biological Diversity's (CBD) 20 Aichi Biodiversity Targets. In England, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' (Defra, 2011) sets out the strategic direction for biodiversity policy in the future.

The former UK BAP was used to draw up lists of species and habitats of 'principal importance' which continue to be regarded as priorities under the Post-2010 Biodiversity Framework and are identified under Section 41 of the NERC Act 2006; these species have been considered throughout this report.

3.3 Local Planning Policy & Biodiversity Action Plan

The Cumbria Biodiversity Action Plan identifies protected species within the borough which are in need of priority conservation action. The list was updated in 2009 to include all UK BAP species present in Cumbria.

Copeland Borough Council have produced the Copeland Local Plan 2021 – 2038 which details the goals for the borough. This plan includes the Natural Environment and Biodiversity Net Gain, as well as Green

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Infrastructure. Strategic Policy N3PU covers Biodiversity Net Gain. Cumbria also have a pilot Local Nature Recovery Strategy document in place (Cumbria County Council, 2021).

Strategic Policy N3PU: Biodiversity Net Gain

The policy states that all developments (with the exception of those listed in the Environment Act 2021) must provide a minimum 10% biodiversity net gain above existing site levels, following the below approach:

1. On site provision;
2. Off site provision (in a Local Nature Recovery Network);
3. Off site provision or;
4. The purchase of biodiversity units/ credits where investment will be directed to nationally strategic habitats where there are no local habitat creation projects available.

The policy states that sites where net gain is provided must be managed and monitored by the applicant for a minimum of 30-years with annual monitoring reports submitted to the council each year.

Local Nature Recovery Strategy

The LNRS details priority habitats and opportunities for nature recovery beyond these to create a “bigger, better, joined” network. The plan details the habitat baseline of Cumbria and identified specific areas where action for nature should be taken.

3.4 Biodiversity Net Gain

As part of Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) biodiversity net gain is becoming mandatory in England. This means developers must deliver a minimum biodiversity net gain of 10% measurable biodiversity net gain resulting in more or better-quality natural habitat than was prior to development.

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4.0 PROJECT BACKGROUND

4.1 Summary of Ecological Baseline

A site visit was undertaken on the 15th November 2023 by Laura Thompson BSc ACIEEM, Senior Ecologist, in accordance with the UK Habitat Classification methodology (Butcher et al., 2020) using the most up to date version on the UK Habitat Classification (Version 2.0). Habitats have been converted to BNG habitats in Table 1 below as detailed within the Statutory Biodiversity Metric Draft User Guide. Habitats have been assessed as per the Statutory Biodiversity Metric Condition Assessments (DEFRA, 2023).

Full survey details are within the PEA & PRA Report which should be read in conjunction with this one.

Five BNG habitats were recorded during the site visit. Ruderal/ ephemeral and introduced shrub habitats have not been included in mapping or the net gain calculation as the areas recorded are less than the minimum mapping units of 25m^2. Descriptions of habitats are below, with condition assessments in section 3.4.

Table 1 Habitat descriptions

Habitat Type		Description	Photograph(s)
UKHab	**BNG**		
h3d -Bramble scrub	Bramble scrub	The very south of site is dominated by a strip of bramble *Rubus fruticosus* dominated scrub with a single alder *Alnus glutinosa* present and featuring undesirable species such as broadleaved dock *Rumex obtusifolius*, cleavers *Galium aparine*, rosebay willowherb *Chamerion angustifolium*, and hedge bindweed *Calystegia sepium*.	
u1b – Developed land; sealed surface	Developed land; sealed surface	The northern section of site is a road and car park with a small area of path along the south of building reference A (the most southern building).	

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u1b5 - Buildings	Developed land; sealed surface	There are three buildings on site. All buildings are connected. These are a garage showroom, a workshop and a fuel station canopy. These are not distinguished from other developed land within BNG habitat map and provide negligible ecological value and no habitat units as developed land described above.	
u1c – Artificial unvegetated , unsealed surface	Artificial unvegetated , unsealed surface	The south section of site, as well as some strips to the west and east are made up of a loose gravel which has allowed the presence of ephemeral vegetation to grow through.	
Secondary code 81 – Ruderal/ ephemeral	Ruderal/ ephemeral	Buddleia *Buddleja davidii* is present in areas of site and the loose gravel of artificial unvegetated, unsealed surface has allowed a variety of ephemeral vegetation to emerge. Species recorded include buddleia, dandelion *Taraxacum officinale*, spear thistle *Cirsium vulgare*, common nettle *Urtica dioica*, white clover *Trifolium repens*, sow thistle *Sonchus sp.*, vetch *Vicia sp.*, meadow vetchling *Laythrus pratensis*, geranium *Geranium sp.*, common figwort *Scrophularia nodosa*, greater plantain	

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		Plantago lanceolata, and black medick *Medicago lupulina*. *These areas are smaller than the minimum mapping units of BNG and have therefore not been included in the metrics map or calculation.	
Secondary code 847 – Introduced shrub	Introduced shrub	There is a patch of introduced shrubs within a corner next to the southernmost building. These are identified as skimmia *Skimmia sp.* and cotoneaster *Cotoneaster sp.* *These areas are smaller than the minimum mapping units of BNG and have therefore not been included in the metrics map or calculation.	

4.2 Mitigation Hierarchy

This Biodiversity Metrics has been carried out with the mitigation hierarchy of avoidance, minimisation, restoration, and compensation in mind. Therefore, habitats have been retained or enhanced where possible before removal and replacement. The site to be developed effects as small amount of land as possible.

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5.0 METHODOLOGY

5.1 Introduction

The aim of the biodiversity net gain is to ensure that developments include an increase in habitat biodiversity in comparison to the habitats on site before development. Documentation is available for classifying habitats so that there is consistency, and the approach is unified across the sector. The biometric calculator tool produced by DEFRA (2023) allows information to be processed so that biodiversity is quantified before and after development, allowing a % change in biodiversity to be produced. The tool is also useful for providing advice when estimating areas of habitat required for management or habitat creation when off-site compensation is needed.

5.2 Personnel

This Biodiversity Metrics calculation and report have been prepared by Laura Thompson BSc MCIEEM, Principal Ecologist. Laura has been working on BNG projects since early in the process and is experienced in using the Biodiversity Metrics from version 2.0 onwards, keeping up to date with changes as they develop. She has experience of completing a variety of large and small net gain projects and has attended training in using the metrics to solidify her skills.

5.3 Methodology

BNG works have been carried out in line with the Biodiversity Net Gain Good practice principles for development (CIEEM, CIRIA, IEMA, 2016 & 2019) and BS8683.

The scheme was input into the Statutory Biodiversity Metric (DEFRA 2025) using the following methodology:

- Distinctiveness is filled in automatically by the metrics.
- Existing habitats and their condition assessments were recorded during the survey carried out on 15th November 2023. The Statutory Biodiversity Metric Condition Assessments were used to carry out condition assessments.
- Proposed habitats were taken from the most up to date document Landscape Plan by Smeeden Foreman (2025).
- The Biodiversity Metric QGIS template is used to map both existing and proposed habitats with the programme also used to gain area measurements.
- Individual tree habitat size is estimated using the tree helper tool within the Statutory Biodiversity Metric. Tree size is decided by the diameter at breast height (DBH) as explained within The Statutory Biodiversity Metric User Guide (DEFRA, 2025):
    1. Trees with a diameter of less that 75mm are not counted.
    2. Trees between 75mm and 300mm are classed as small.
    3. Trees between 300 – 600mm are medium
    4. Trees between 600 – 900mm are large.
    5. Those greater than 900mm are very large.

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All newly planted trees are included in the metric as small, unlikely to reach a greater size within the 30-year lifespan of the metric.

- The Cumbria Local Nature Recovery Strategy map was consulted to assess the sites strategic significance. The site is not identified of importance to habitats within the strategy and has been included in the metrics as “area not in the local strategy”.
- All habitats were recorded as “On site”.

The proposals for this site have been used to offset the loss of bramble scrub, the only habitat with any biodiversity value. The remaining proposals for this site will be used as off-site habitat units for a similar development in Whitehaven.

5.4 Limitations and Constraints

The initial habitat survey was undertaken in November, outside of the main flowering season. However, given the habitats on site, this is not deemed to be a constraint.

Proposed habitats within the Biodiversity Metrics have been made in a conservative manner, aiming to be achievable. Should any habitats created within site not meet the conditions within the Biodiversity Metrics, then the net gain figure will differ from that quoted in this report.

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6.0 BASELINE CONDITIONS

6.1 Habitat Condition Assessments

6.1.1 Bramble scrub is recorded in the metric as “condition assessment – N/A”.

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7.0 BNG GOOD PRACTICE PRINCIPLES

7.1 Good Practice Principles for Development

Taken from the document prepared by CIEEM, CIRIA, & IEMA, the following are the BNG good practice principles for development:

1. Apply the mitigation hierarchy;
2. Avoid losing biodiversity that cannot be offset by gains elsewhere;
3. Be inclusive and equitable;
4. Address risks;
5. Make a measurable net gain contribution;
6. Achieve the best outcome for biodiversity;
7. Be additional;
8. Create a Net Gain legacy;
9. Optimise sustainability;
10. Be transparent.

Appendix B details how this project has applied these principles to the BNG.

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8.0 PROPOSED DESIGN

The site will be cleared before new habitats are created with no enhancements proposed for site. Proposed habitats have been made in a conservative manner, aiming to be achievable and realistic. The habitats discussed within this report are relevant only to achieving gain for this project. Other habitats have been discussed as off-site gain within the Aldi Whitehaven report (Total Ecology, 2025).

8.1 Habitat Condition Assessments

8.1.1 *Mixed Scrub*

Mixed scrub is due to be planted around the southern boundary of site. Planting is due to be of native scrub species:

- Dogwood *Cornus sanguinea*
- Hazel *Corylus avellana*
- Hawthorn *Crataegus monogyna*
- Blackthorn *Prunus spinosa*
- Dog rose *Rosa canina*
- Guelder rose *Viburnum opulus*

Given the relatively small area of planting, it is unlikely that scrub will develop a good, varied structure. The proposed area of planting is bound by hardstanding and will therefore not feature a well-developed edge. Scrub on site will therefore likely achieve only poor condition.

Table 2 Condition Sheet: Scrub Habitat Type (DEFRA 2025)

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). - At least 80% of scrub is native, - There are at least three native woody species, - No single species comprises more than 75% of the cover (except hazel *Corylus avellana*, common juniper *Juniperus communis*, sea buckthorn *Hippophae rhamnoides* or box *Buxus sempervirens*, which can be up to 100% cover).	Y	At least 3 species to be planted.
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	N	Not likely given nature of planting.
C	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA) and species indicative of suboptimal condition make up less than 5% of ground cover.	Y	No INNS to be included in planting schedule.
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	N	Unlikely to have well-developed edge.
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	N	Habitat area too small for these features.
		Number of criteria passed	2

Condition Assessment Result (out of 5 criteria)	Condition Assessment Score	Score Achieved ×/✓
Passes 5 criteria	Good (3)	
Passes 3 or 4 criteria	Moderate (2)	
Passes 2 or fewer criteria	Poor (1)	✓

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9.0 BNG METRIC RESULTS

The National Planning Policy Framework (NPPF) outlines government planning policies and how they should be applied within local authorities. The framework places an emphasis on sustainable development, encouraging the re-use of land that has previously been developed in preference to using land that has a higher environmental value and by minimising impacts on biodiversity. The NPPF states that developments should aim to conserve or enhance biodiversity and encourages opportunities to incorporate biodiversity in and around developments.

Taking the requirements of the NPPF into account, opportunities should be sought where possible for nature conservation enhancement at this site with an overall minimum 10% net gain recommended. A precautionary approach has been taken when completing the metrics, making sure that proposals are realistic.

The Biodiversity Metric calculation shows the following:

Table 3 Summary of biodiversity uplift.

On-site baseline:	On-site proposals:
• 0.08 habitat units • 0.00 hedgerow units • 0.00 watercourse units	• 0.09 habitat units • 0.00 hedgerow units • 0.00 watercourse units

This results in 11.84% gain of habitat. The trading rules are not satisfied by the current plans as there is a loss of bramble scrub which is not adequately replaced by mixed scrub or habitats of a higher distinctiveness.

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10.0 REFERENCES

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APPENDIX A

Figures

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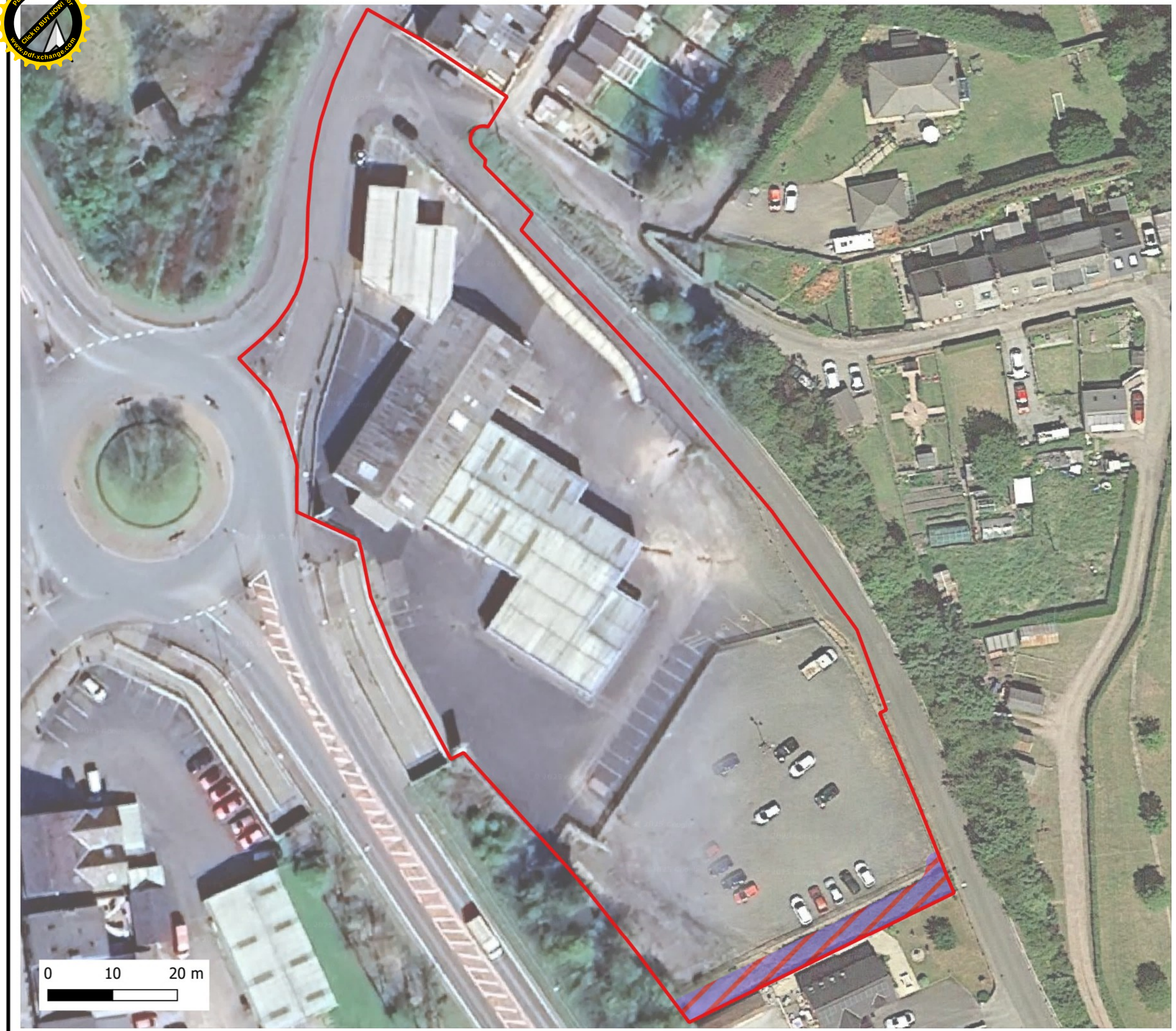

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Legend

Red Line Boundary

HABITATS

Habitats Baseline

Bramble scrub

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Project	Aldi, Egremont
Title	Baseline Habitats Map
Client	Aldi
Date	28/11/2025
Ref	Figure 1

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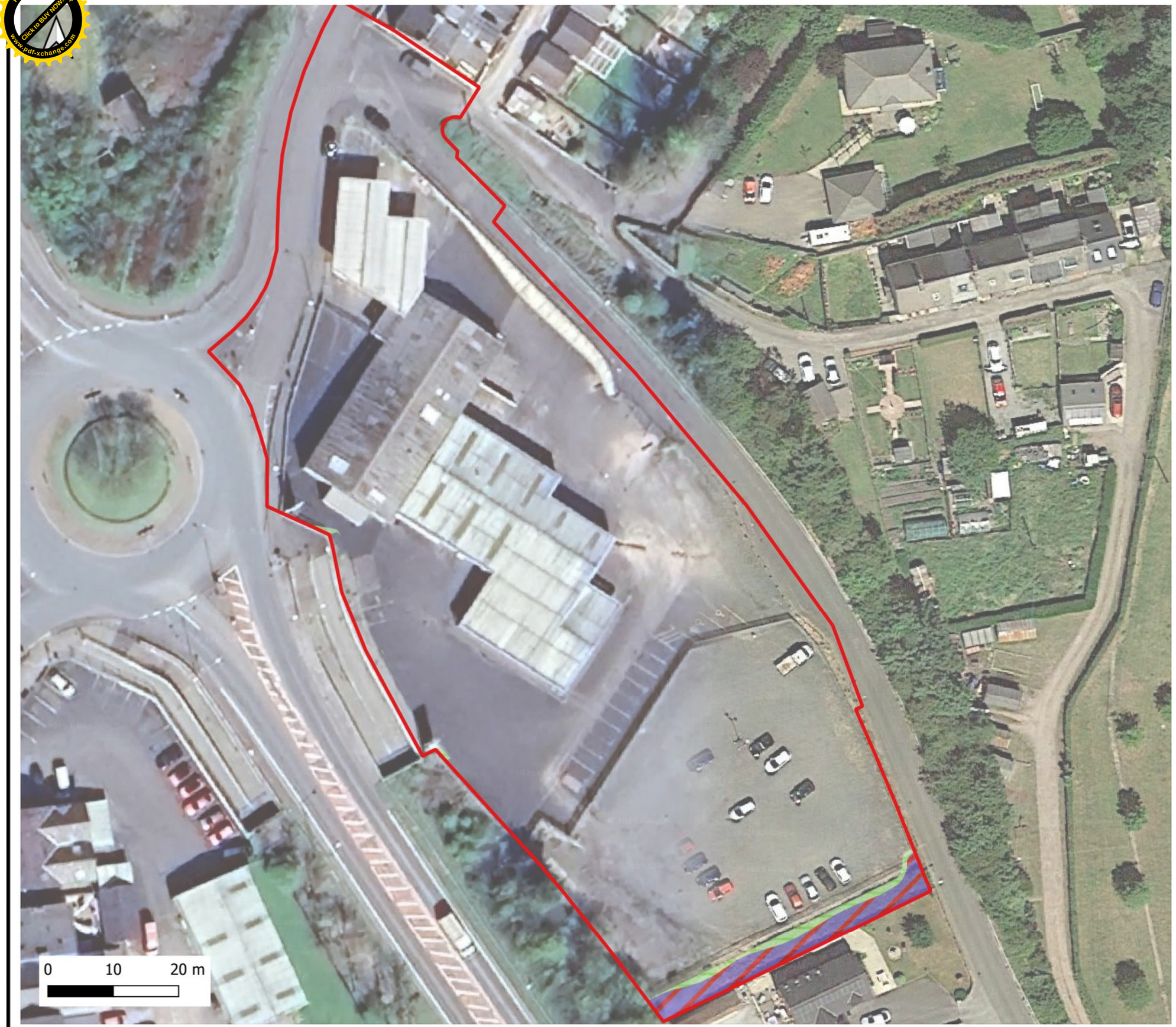

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Legend

Red Line Boundary

HABITATS

Habitats Proposed

- Mixed scrub
- Other neutral grassland

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Project	Aldi, Egremont
Title	Proposed Habitats Map
Client	Aldi
Date	28/11/2025
Ref	Figure 2

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APPENDIX B

Application of good practice principles

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BNG Principle	Indicators
Principle 1. Apply the Mitigation Hierarchy	It is necessary to clear site to be able to create new habitats and the new store and therefore avoidance is not possible on this site. However, only bramble scrub provides any habitat units and therefore the site will be much improved via the creation of the store and landscaping with only minimum loss of bramble scrub, a habitat with limited potential.
Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere	There are no irreplaceable habitats on site and only bramble scrub provides any habitat units which is a relatively poor habitat, that is commonly occurring.
Principle 3. Be inclusive and equitable	This report will be provided as part of the store planning application, to the local planning authority.
Principle 4. Address risks	This report and the metric calculation clearly demonstrate a gain in biodiversity on site. There is a risk that habitats will not achieve or remain in the condition recorded within the metric, which would result in a lower gain. However, on this site, the habitat baseline is so low that even lower quality habitats will still lead a net gain in biodiversity. A management and monitoring plan may be needed to ensure gains stay in place for the 30-year lifespan of the metric.
Principle 5. Make a measurable Net Gain	The most up to date metric has been used (The Statutory Biodiversity Metric Calculation Tool) and this shows a large gain.
Principle 6. Achieve the best outcomes for biodiversity	The site is not identified as an area for improvement in the Local Nature Recovery Strategy, being in a relatively urban area. However, the addition of grassland and scrub on site will improve the biodiversity of the area, with scrub providing some connectivity along the south of site. The BNG is in line with local policy N3PU as the gain is over 10% and is achieved on-site, which is the first priority within the policy.
Principle 7. Be additional	The site is currently almost entirely urban with a large area of sealed surface that will not allow vegetation growth. Although some succession may take place should the site be left, this would be restricted in area and unmanaged. The proposals to create neutral grassland and managed mixed scrub will provide better-quality habitats on areas which would otherwise largely remain as hardstanding.
Principle 8. Create a Net Gain legacy	The client is responsible for ensuring net gain for the 30-year lifespan. It is up to them to place someone with appropriate experience in charge of this.
Principle 9. Optimise sustainability	The project provides improvement to the Egremont economy by the creation of a new budget foodstore. Landscaping as part of the foodstore creation allows the project to also provide an improvement to the biodiversity of the area.

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Principle 10. Be transparent	This report will be submitted as part of the planning process and will therefore be available on the local planning authority planning portal.

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APPENDIX C

Report Conditions

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TOTAL ECOLOGY

REPORT CONDITIONS
Egremont

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This report is prepared for the proposed uses stated in the report and should not be used in a different context without reference to Total Ecology. In time improved practices, fresh information or amended legislation may necessitate a re-assessment. Opinions and information provided in this report are on the basis of Total Ecology using due skill and care in the preparation of the report.

This report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times.

This report is limited to those aspects reported on, within the scope and limits agreed with the client under our appointment. It is necessarily restricted and no liability is accepted for any other aspect. It is based on the information sources indicated in the report. Some of the opinions are based on unconfirmed data and information and are presented as the best obtained within the scope for this report.

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The potential influence of our assessment and report on other aspects of any development or future planning requires evaluation by other involved parties.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Total Ecology accept no liability for issues with performance arising from such factors

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