



# **Biodiversity Net Gain Strategy**

**Hensingham ARLFC  
Cleaton Moor Road  
Whitehaven**

**Hensingham ARLFC c/o Stobbarts Ltd**

**FE-333-001-400-R-02**

**May 2026**



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### Confidentiality: Not confidential

|               |                                     |
|---------------|-------------------------------------|
| Site Name     | Hensingham ARLFC                    |
| Report Name:  | Biodiversity Net Gain Strategy      |
| Client:       | Hensingham ARLFC co/ Stobbarts Ltd. |
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### Document Checking

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## 1 Background

- 1.1.1 FALCO Ecology has been commissioned by Andy West of Day Cummings Ltd. on behalf of Hensingham ARLFC c/o Stobbarts Ltd to complete a Biodiversity Net Gain calculation for development at Hensingham ARLFC in Whitehaven.
- 1.1.2 The planning application proposes the construction of a new changing rooms.
- 1.1.3 This report accompanies the Biodiversity Net Gain (BNG) calculation using Statutory Defra Metric (as of 03/07/2025).

## 2 Methodology

### 2.1 Phase 1 habitat survey

- 2.1.1 The survey was undertaken by Adrian George, a suitably qualified and experienced ecologist working for FALCO Ecology on the 31<sup>st</sup> March 2026 during good weather conditions.

### 2.2 Classification of habitats

- 2.2.1 The existing habitats were classified using the Phase 1 Habitat Survey methodology developed by the Joint Nature Conservation Committee (JNCC, 2010) and modified by the Institute of Environmental Assessment (IEA, 1995). The main plant species were recorded and broad habitat types mapped according to both the Phase 1 Habitat Survey methodology, and the UK Habitats Classification definitions (UK Habitat Classification Working Group, 2018). Plant species were identified according to Rose (2006).

### 2.3 Mapping and condition of onsite baseline habitats

- 2.3.1 Habitats were characterised as described above and mapped using QGIS. Professional judgement was used to make condition assessments of habitats, when applicable. The baseline habitats are shown in Figure 1, Appendix 1.
- 2.3.2 Baseline habitats are as follows:
  - Grassland – other neutral grassland = 0.1174 ha poor condition failing criteria A, B and F.
- 2.3.3 Photos of the site taken during the phase 1 habitat survey on the 31<sup>st</sup> March 2026 are shown on page 2.

### 2.4 Mapping of Post-Development Habitats

- 2.4.1 Retained and created habitats within the redline boundary are shown in Figure 2, Appendix 1.

#### Habitat creation within the redline boundary

- Urban – developed land; sealed surface (building) = 0.0357 ha condition assessment not applicable.

#### Habitat enhanced within the redline boundary

- Grassland – other neutral grassland = 0.0817 ha to be enhanced from poor to moderate condition.





## **2.5 Biodiversity Net Gain calculation**

- 2.5.1 This calculation uses the Statutory Defra Metric utilising the guidance, technical supplements and habitat condition assessment sheets provided by Natural England and following CIEEM Biodiversity Net Gain: Good practice principles for development (2016). Areas are measured in ha and lengths in km.



### 3 Biodiversity Net Gain and Losses

#### 3.1 Principals of net gain

3.1.1 Ten principles setting out good practice for achieving Biodiversity Net Gain<sup>1</sup> have been applied as shown in Table 1 below.

**Table 1:** Principals of Biodiversity Net Gain.

| Principal                                                                                             | Principal met? | Comments                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Utilise the mitigation hierarchy to minimise impact on biodiversity                                   | Yes            | Area of low ecological value. Habitats onsite are amenity value, the grassland within the redline boundary will be enhanced to compensate the loss of the grassland. The enhancement bringing more value to the site at site level. |
| Eliminate negative impacts on biodiversity that cannot be offset elsewhere                            | Yes            | Realistic potential for net gain met with onsite proposals.                                                                                                                                                                         |
| Involve all pre-development and post-development stakeholders in forming mandatory net gain solutions | Yes            | Landowners and Local Planning Authority (LPA) involved. No other realistic stakeholders.                                                                                                                                            |
| Understand the potential risks and variable factors to achieving biodiversity net gain                | Yes            |                                                                                                                                                                                                                                     |
| Determine a suitable method to secure measurable net gains for biodiversity                           | Yes            | Reseed grassland to increase number of vascular plants as part of a Habitat Management & Monitoring Plan. This is achievable.                                                                                                       |
| Ensure the best possible outcomes from biodiversity net gain                                          | Yes            | Potential for more than 10% gain to be achieved                                                                                                                                                                                     |
| Offer nature conservation that exceed the BNG requirements                                            | Yes            | Potential for more than 10% gain to be achieved for hedgerow units                                                                                                                                                                  |
| Focus on generating long-term environmental benefits from biodiversity net gain                       | Yes            | Provided within the redline boundary.                                                                                                                                                                                               |
| Cover all areas of sustainability, incorporating economical and societal factors                      | Yes            | Proposed on-site habitats enhanced for the environment, for people and local wildlife.                                                                                                                                              |

#### 3.2 On Site Baseline, Pre-construction Biodiversity Units

3.2.1 Baseline habitat information used to inform this assessment was taken from the Extended Phase 1 Habitat survey undertaken by Adrian George. Identified baseline habitats within the Site included:

- Grassland – other neutral grassland.

3.2.2 The locations of these habitats are shown in Appendix A, Figure 1.

<sup>1</sup> <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>



- 3.2.3 The habitat conditions have been determined by a professional ecologist and the area or length of habitats have been estimated using mapping tools (QGIS and Google Earth).
- 3.2.4 A full condition assessment is provided in Appendix 2. Habitats are allocated using professional judgement, alongside the UK Habitat Classification definitions<sup>2</sup> and the metric user guide<sup>3</sup>. The habitat conditions were assessed using the Statutory Biodiversity Metric Condition Assessment<sup>4</sup>.
- 3.2.5 All onsite habitats are recorded as "area not in local strategy" following a review of Copeland Local Plan Map<sup>5</sup>.

### 3.3 On Site Post Construction Biodiversity Units

- 3.3.1 Following construction, new habitats will consist of:
- Grassland – other neutral grassland - enhanced.
  - Urban – developed land sealed surface.
- 3.3.2 All onsite habitats are recorded as "area not in local strategy" following a review of Copeland Council Map<sup>5</sup>.

### 3.4 Summary of result

- 3.4.1 Summary of percentage change and biodiversity net gain in units; detail taken from Statutory Defra Metric, 'Headline Results' sheet provided on page 6. This predicts - 0.14 habitat unit loss in habitat areas, no hedgerow or watercourse units are present onsite. Trading rules have been satisfied in habitat units.
- 3.4.2 In order to ensure the Development meets the statutory requirements for 10% biodiversity net gain and objectives of the Local Plan. Onsite land will be used as described in Section 4 to rectify this.

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<sup>2</sup> UKHab Ltd (2023). UK Habitat Classification Version 2.0 [Online]. Available at <https://www.ukhab.org> (Accessed November 2025).

<sup>3</sup> Gov.uk (2023) The Statutory Biodiversity Metric – Draft User Guide Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides> (Accessed May 2026)

<sup>4</sup> Gov.uk (2024) The Statutory Biodiversity Metric – The Statutory Biodiversity Metric – Statutory Biodiversity Metric Condition Assessments Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides> (Accessed November 2025)

<sup>5</sup> Copeland Council, North Copeland Map, Available at: [https://www.copeland.gov.uk/sites/default/files/attachments/north\\_copeland\\_map.pdf](https://www.copeland.gov.uk/sites/default/files/attachments/north_copeland_map.pdf) (Accessed May 2026)



## 4 Options to Achieve 10% Net Gain

### 4.1 Current Status

- 4.1.1 Using onsite habitats only, the Site displays a 18.32% net gain in habitat units, this exceeds the 10% net gain stipulated by the Environment Act and objectives of the Local Plan. CIEEM BNG good practice principles for development specifies:

*"Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere."*

### 4.2 Quantifiable Net Gain

- 4.2.1 The enhancement of 0.0817 ha of poor condition other neutral grassland to moderate condition by overseeding, altering of management regime and removal of targeted species, would result in an on-site increase of 0.09 units.

- 4.2.2 Trading rules will also be met by the proposed onsite enhancement.

| FINAL RESULTS                                                                                                                       |                    |                       |                       |                     |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------|-----------------------|-----------------------|---------------------|
| <b>Total net unit change</b><br><small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small> | Area habitat units | 0.09                  |                       |                     |
|                                                                                                                                     | Hedgerow units     | 0.00                  |                       |                     |
|                                                                                                                                     | Watercourse units  | 0.00                  |                       |                     |
| <b>Total net % change</b><br><small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>    | Area habitat units | 18.32%                |                       |                     |
|                                                                                                                                     | Hedgerow units     | 0.00%                 |                       |                     |
|                                                                                                                                     | Watercourse units  | 0.00%                 |                       |                     |
| <b>Trading rules satisfied?</b>                                                                                                     | Yes ✓              |                       |                       |                     |
|                                                                                                                                     |                    |                       |                       |                     |
| <b>Unit Type</b>                                                                                                                    | <b>Target</b>      | <b>Baseline Units</b> | <b>Units Required</b> | <b>Unit Deficit</b> |
| Area habitat units                                                                                                                  | 10.00%             | 0.47                  | 0.52                  | 0.00                |
| Hedgerow units                                                                                                                      | 10.00%             | 0.00                  | 0.00                  | 0.00                |
| Watercourse units                                                                                                                   | 10.00%             | 0.00                  | 0.00                  | 0.00                |



## 5 Enhancement Measures

- 5.1.1 The enhancement of the other neutral grassland from poor to moderate condition can be achieved by creating a varied sward height with at least 20% of the sward at less than 7cm and at least 20% at more than 7cm thus creating microclimates with provide opportunities for insects, birds and small mammals to live and breed. This can be achieved by mowing small sections and leaving other sections. A rotation of cutting areas will be required to minimise the spread of Bramble within the grassland habitat.
- 5.1.2 For neutral to loamy soils in Cumbria, the recommended seed mix is a native "General Neutral Hay Meadow" (MG5) mix, ideally with 80% grasses and 20% wildflowers. Key species include yellow rattle, knapweed, meadow buttercup, and oxeye daisy, with yellow rattle being essential for controlling grass growth and boosting diversity.
- 5.1.3 Maintaining neutral grassland requires a low-intensity management approach, focused on reducing soil fertility and preventing coarse, dominant grasses from swamping wildflowers. The most effective method is a "**cut and remove**" regime, ideally mimicking traditional haymaking.



## 6 Conclusion

- 6.1.1 Biodiversity net gain can be achieved within the redline boundary by enhancing the condition assessment of the existing other neutral grassland from poor to moderate.
- 6.1.2 The overall achievable net gain for the Development is 18.76% for habitat units.



## **Appendix 1 – Figures**



## LEGEND

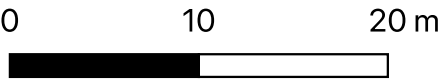
### Baseline Habitats

 Other neutral grassland

 Redline boundary

Google Satellite

DO NOT scale from drawing,.For illustration purposes only.



| REV. | Details | DRA | CHD | APP | DATE     |
|------|---------|-----|-----|-----|----------|
| RO   | Final   | AJG | AJG | AJG | 13.05.26 |
| R1   |         |     |     |     |          |

|                    |                                     |
|--------------------|-------------------------------------|
| Client             | Hensingham ARLFC c/o Stobbarts Ltd. |
| Project            | Hensingham ARLFC                    |
| Title              | Baseline Habitat Map                |
| Figure Number      | 1                                   |
| Scale              | 1:500 @A3                           |
| Document Reference | FE-333-001-500-D-01                 |



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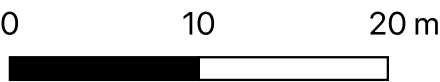
LEGEND

Created Habitats

-  Other neutral grassland – moderate condition
-  Urban – Developed land; sealed surface
-  Redline boundary

Google Satellite

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| REV. | Details | DRA | CHD | APP | DATE     |
|------|---------|-----|-----|-----|----------|
| RO   | Final   | AJG | AJG | AJG | 13.05.26 |
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|                    |                                     |
|--------------------|-------------------------------------|
| Client             | Hensingham ARLFC c/o Stobbarts Ltd. |
| Project            | Hensingham ARLFC                    |
| Title              | Post–development Habitat Map        |
| Figure Number      | 2                                   |
| Scale              | 1:500 @A3                           |
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## **Appendix 2 – Baseline Condition Assessment**



**Table 2:** Baseline Condition Assessment Onsite Habitats.

| Broad Habitat | Habitat Type            | Condition | Assessment Criteria Passed | Comments                                                                                    |
|---------------|-------------------------|-----------|----------------------------|---------------------------------------------------------------------------------------------|
| Grassland     | Other neutral grassland | Poor      | C, D & E                   | Under 6 species per/m <sup>2</sup> and homogenous sward. No bare earth, scrub or invasives. |