



Biodiversity Net Gain Strategy

Aldi, Egremont

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Version 1



Quality Control

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BIODIVERSITY NET GAIN STRATEGY

Aldi Egremont

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1.0 INTRODUCTION

1.1 Background

Total Ecology was commissioned by Avison Young on behalf of Aldi in March 2026 to produce a Biodiversity Net Gain Strategy in relation to a proposed Aldi off Wyndham Place, Egremont. The approximate National Grid Reference for the centre of the site is **NY 01176 11081**.

A Preliminary Ecological Appraisal, Ecological Impact Assessment, and Biodiversity Net Gain Report have all been produced by Total Ecology and should be read in conjunction with this report. The BNG calculation used the Statutory Biodiversity Metric Calculation Tool (DEFRA, 2025) with the calculation submitted along with the BNG report.

A BNGS has been requested to address the following: *The BNGS shall detail proposals to redress loss of biodiversity and the mitigation strategy proposed shall include all on and off-site habitats required to deliver a net gain of at least ten percent. The BNGS shall use the Statutory Biodiversity Metric Calculation Tool associated with the Environment Act 2021.*

1.2 Site Description

The site at Egremont 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.

1.3 Objectives

The objective of this report is to detail how biodiversity net gain will be satisfied in relation to this proposal.

1.4 Relevant 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 other relevant reports):

- Town and Country Planning Act 1990;
- The Hedgerows Regulations 1997;
- Environment Act 2021.



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.

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.

Local Planning Policy & Biodiversity Action Plan

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 Infrastructure. Strategic Policy N3PU covers Biodiversity Net Gain.

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

There are 48 responsible bodies in England which will lead on preparing local nature recovery strategies (LNRS) for their area. These 48 strategy areas will cover the entirety of England.

The Cumbria Local Nature Recovery Strategy covers these sites.

Biodiversity Net Gain

The aim of Biodiversity Net Gain is to ensure that developments achieve an increase of at least 10% in terms of biodiversity value in comparison to the habitats on site before development. This can be delivered on a development, off-site, or a combination of the two. Documentation is available for classifying habitats so that there is consistency, and the approach is unified across the sector. The biodiversity metric calculator tool produced by Natural England (2025) 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.

The Environment Bill received royal assent on the 9th November 2021 and is now an act of parliament (law), with a 10% Biodiversity Net Gain as a statutory requirement for new development and requires biodiversity gains to be managed for a minimum of 30 years. These goals are enforceable by local planning authorities.

2.0 ON-SITE MITIGATION

BNG is being achieved following 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.

2.1 On-site mitigation summary

2.1.1 Other neutral grassland

A small strip of other neutral grassland will be created along the south of site. A flowering lawn mix is due to be planted, to sweep around the southern elevations of the site, behind the store. This is due to be planted with the Emorsgate Seeds EL1 Flowering Lawn (mix found here: <https://wildseed.co.uk/product/mixtures/complete-mixtures/special-habitat-mixtures/flowering-lawn-mixture/>). This will match the definition of the BNG habitat Other Neutral Grassland by featuring 20% cover of herbs, over 1 species of grass which is not generally sown for intensive agricultural production and having a cover of ryegrasses *Lolium spp.* and white clover less than 30%. This proposed habitat has therefore been condition assessed as a medium distinctiveness grassland.

Table 1 Condition Sheet: Grassland Habitat Type (medium, high, & very high distinctiveness) (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, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type. Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Y	Discussed above.
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	N	Likely to be mown short and uniform.
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Y	Likely to pass.
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Y	None to be planted. Scrub encroachment of adjacent habitats to be monitored.
E	Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.	Y	Likely to pass.
Additional Criterion - must be assessed for all non-acid grassland types			
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	N	Given planting mix and likely management, it is very unlikely that this will be achieved with a lawn mix.
Essential criterion for Good condition achieved (for non-acid grassland) (Yes or No)		Y	

Number of criteria passed		4
Condition Assessment Result	Condition Assessment Score	Score Achieved ✕/✓
Non-acid grassland types (Result out of 6 criteria)		
Passes 5 or 6 criteria, including essential criterion A and additional criterion F.	Good (3)	
Passes 3 - 5 criteria, including essential criterion A.	Moderate (2)	✓
Passes 2 or fewer criteria; OR Passes 3 or 4 criteria excluding criterion A and F.	Poor (1)	

2.1.2 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 <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> or box <i>Buxus sempervirens</i> , 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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2.2 Implementation Strategy

2.2.1 Grassland creation

Prior to planting the ground should be cultivated to a depth of at least 10cm (at least 25cm on badly draining or compacted soils) and prepare a fine tilth. This should be carried out as early as possible, ideally 2 months prior to the planned sowing date to encourage any weeds in the surface soil to germinate.

It is essential to control any weeds before sowing a grassland mix (i.e. nettles *Urtica spp.*, docks *Rumex spp.* and/ or thistles *Cirsium spp.*). This should be done by hand wherever possible. If necessary, a non-residual eco-friendly non-glyphosate herbicide should be used once weeds reach a height of 2cm to eradicate any weeds without disturbing soil surface.

Seeds should be sown in the late summer/ autumn, ideally the last week in August or first week in September. Alternatively, a spring sowing may take place from March onwards. Seeds should be sown evenly by hand at 3 – 5 grams per m² followed by a rake or harrow into the top 3mm of soil surface. Avoid rolling late autumn sowings as there is usually adequate soil water for germination and rolling before winter can cap the soil.

2.2.2 Scrub creation

To create mixed scrub above species should be planted. Species should be purchased which are of local provenance.

Prior to planting the ground should be prepared by removing any existing vegetation and weeds. Vegetation removal should ideally be carried out by hand though an environmentally friendly non-residual glyphosate-free weed killer may be used. Trees should be planted between mid-November and late March when roots are dormant and more able to cope with being moved. Planted trees should be protected with biodegradable tree guards.

2.3 Management and maintenance

2.3.1 Grassland

As a flowering lawn, grassland is likely to be regularly mown. Once the habitat is mown any arisings should be removed from site. Weeds should be controlled by spot treatment with an appropriate ecofriendly, non-residual, and glyphosate free herbicide.

Any scrub encroaching onto the grassland should be removed; all trees selected for removal should be felled to ground level with logs left in piles for invertebrates and mammals within scrub on site. Branches should be chipped and removed from site. After felling, stumps should be treated with a

suitable herbicide to prevent re-growth.

2.3.2 *Scrub*

In the first few years after planting weeding will be necessary. This should be done by hand, or if necessary, a glyphosate free environmentally friendly weed killer may be used.

Ties and/ or tree guards should be checked every six months and adjusted/ replaced if necessary. Once the tree is sturdy, the tie and stake should be removed, with any waste materials removed from site. Any losses should be replaced the following winter.

2.4 **Monitoring**

A suitably qualified ecologist will visit site to ensure aims and objectives are being met for:

- Other neutral grassland in moderate condition.
- Scrub in poor condition.

Remedial action will be recommended if necessary.

Table 3 Monitoring Schedule

Habitat	Monitoring required	Timing
Grassland	• Habitat survey including quadrat sampling to ensure grassland is a good example of 'other neutral grassland' including having appropriate indicator species and species richness, and lack of those species which indicate sub-optimal condition. • Habitat survey to ensure lack of INNS, bracken, and scrub.	Annually from years 1, 3, 5. Then years 10, 20 and 30. June - July
Scrub	• Visual survey to check stake and tie/ tree guard until removed. • Monitoring for losses to be replaced. • Monitoring for any INNS or more than 5% cover of undesirables.	Biannually until guard removed. Any time of year. Years 1, 3, and then every 5 years (years 5, 10, 15, 20, 25, 30). Spring – Autumn.



SUMMARY

Full details of the on-site BNG calculation for Egremont are in the BNG report which should be read in full alongside this report. Below is a summary:

Table 4 Biodiversity Net Gain Summary

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. This provides an appropriate amount of net gain though does not satisfy the trading rules of the metric as the scrub proposed does not adequately replace that to be lost. However, this project began prior to the implementation of statutory biodiversity net gain and therefore it is not compulsory for the trading rules to be satisfied.



4.0

REFERENCES

British Standard (2021) BS 8683:2021 Process for designing and implementing Biodiversity Net Gain. Specification

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Department for Levelling Up, Housing & Communities (2023) National Planning Policy Framework

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HMSO (1997) The Hedgerow Regulations 1997

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Total Ecology (2024) Egremont EcIA Report

Total Ecology (2025) Egremont BNG Report V4

UKHab Ltd. (2023) UK Habitat Classification Version 2.0 (at <https://www.ukhab.org/>)

Westmoreland & Furness Council (2025) Cumbria Local Nature Recovery Strategy



APPENDIX A

Report Conditions



Total Ecology

REPORT CONDITIONS

Aldi Egremont

This report is produced solely for the benefit of Aldi and no liability is accepted for any reliance placed on it by any other party unless specifically agreed in writing otherwise.

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.

Reliance has been placed on the documents and information supplied to Total Ecology by others but no independent verification of these has been made and no warranty is given on them. No liability is accepted or warranty given in relation to the performance, reliability, standing etc of any products, services, organisations or companies referred to in this report.

Whilst skill and care have been used, no investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather related conditions.

Although care is taken to select monitoring and survey periods that are typical of the environmental conditions being measured, within the overall reporting programme constraints, measured conditions may not be fully representative of the actual conditions. Any predictive or modelling work, undertaken as part of the commission will be subject to limitations including the representativeness of data used by the model and the assumptions inherent within the approach used. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions.

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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