



envirotech

**Ecological Consultants
Environmental and Rural Chartered Surveyors**

Biodiversity Net Gain Baseline

Barfs Road Distington



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ACCURACY OF REPORT

This report has been compiled based on the methodology as detailed and the professional experience of the surveyor. Whilst the report reflects the situation found as accurately as possible, all of the protected species this survey covers are wild and can move freely from site to site. Their presence or absence detailed in this report does not entirely preclude the possibility of a different past, current or future use of the site surveyed.

We would ask all clients acting upon the contents of this report to show due diligence when undertaking work on their site and/or in their interaction with protected species. If protected species are found during a work programme, and continuing the work programme could result in their disturbance, injury or death, either directly or indirectly an offence may be committed.

If in doubt, stop work and seek further professional advice.

Quality and Environmental Assurance

This report has been printed on recycled paper as part of our commitment to achieving both the ISO 9001 Quality Assurance and ISO 14001 Environmental Assurance standards. Envirotech have been awarded the Gold standard by the Cumbria Business Environmental Network for its Environmental management systems.

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Planning Portal Questions

Please provide the date the onsite pre-development biodiversity value was calculated (this should be either the date of the application, or an earlier proposed date)	18.02.2026	
If an earlier date, to the date of the planning application, has been used, please provide details why this date has been used.	Site conditions have not changed between date of assessment and planning submission	
When was the version of the biodiversity metric published?	3 July 2025	
Please provide the pre-development biodiversity value of onsite habitats on the date of calculation	7.73	Habitat Units
	0.38	Hedgerow Units
	-	Watercourse Units
Please provide the reference or supporting document/plan names for the: i. Biodiversity metric calculation ii. Onsite irreplaceable habitats (if applicable) iii. Onsite habitats existing on the date of the application for planning permission (if applicable)	Home Group Barfs Road Distington BNG	
	N/A	
	Home Group Barfs Road Distington BNG	
Do you believe that, if the development is granted permission, the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended)) would apply?	Yes	
Has there been any loss (or degradation) of any onsite habitat(s), resulting from activities carried out before the date of the onsite pre-development biodiversity value was calculated. Either: - On or after 30 January 2020 which were not in accordance with a planning permission; or - On or after 25 August 2023 which were in accordance with a planning permission?	No	
Does the development site have irreplaceable habitats (corresponding to the descriptions in column 1 of [Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2023)]) which are: i. On land to which the application relates; and ii. Exist on the date of the application for planning permission (or an earlier agreed date)	No	

INTRODUCTION

Purpose of this Report

Envirotech were requested to carry out a biodiversity assessment of Home Groups site at Barfs Road Distington. The aim was for an ecologist with botanical expertise to carry out a site visit to map the habitat types present at the site in order to establish the biodiversity baseline.

Each habitat type was mapped using the standard habitat mapping convention using UK Habitat Classification V2 (Butcher et al., 2023) for the purposes of using the Defra metric.

Using the findings of the baseline surveys, pre-construction ecology was valued against the provisions of the Statutory BNG metric to provide a baseline value of the site.

This report presents the results of this desk-based study to assess net change in biodiversity 'units' in connection with the removal of habitats for the proposed development at the site.

Ecological Context

The site is 2.79Ha and *Figure 1* shows the site location.



 Red Line Boundary

Figure 1
Site Location



Policy context

The primary aims of Biodiversity Net Gain are to secure a measurable improvement in habitat for biodiversity, to minimise biodiversity losses and to help to restore ecological networks whilst streamlining development processes.

The National Planning Policy Framework (NPPF) makes provisions for the delivery of biodiversity net gain. Additionally, there is a 10% net gain requirement in the Environment Bill.

METHODS

Introduction

The statutory biodiversity metric is designed to quantify biodiversity to inform and improve planning, design, land management and decision-making (Natural England, 2024).

This study has been carried out as a desk-based exercise, using the results of field surveys carried out at the site by Envirotech.

Biodiversity Assessment Methods

To calculate biodiversity units for the site and assess any changes arising from the proposed development this study uses methods set out the latest Statutory Biodiversity Metric user guide (Natural England, 2024).

The biodiversity metric uses three core measurements:

- Habitat area
- Length of linear terrestrial habitats
- Length of linear aquatic habitats.

Consequently, a site can have three biodiversity unit values, which are assessed using the same metric, but cannot be summed together.

Habitat area is multiplied by several factors that indicate its quality: distinctiveness, condition, strategic location and connectivity, and this gives its biodiversity unit value. This can be used for existing and future created habitats. In addition, when habitats are to be enhanced or newly-created, the risk of failure is accounted for by applying multipliers for risk factors (difficulty, time to target condition, and off-site risk).

Habitat Distinctiveness

Habitats are classified using the UK habitat classification V2 system (Butcher et al., 2023).

The metric pre-assigns each habitat type to a distinctiveness band according to its distinguishing features, i.e. species richness, rarity (at local, regional, national and international scales), and the degree to which it supports species rarely found in other habitats. On rare occasions, the habitat distinctiveness of a habitat can be altered up or down from the preassigned value. Any

alterations must then be fully explained using evidence relevant to the site, e.g. an increase in distinctiveness because of rare flora or fauna or a decrease in distinctiveness because of significant damage to the habitat.

Habitat Condition

Habitat condition measures the varying quality of similar habitats against what is perceived to be their optimal state. The statutory biodiversity metric technical supplement (Natural England, 2023) contains condition sheets for all habitats to which the metric can apply. The condition sheets contain a habitat description, contextual information to aid the assessment, and the assessment criteria. The criteria describe what components need to be present for a habitat to be in good, moderate or poor condition.

Strategic Location

Strategic location - sometimes called 'strategic significance' - works at a landscape scale, allowing additional value to be added to habitats in 'priority' or 'biodiversity target areas'. They include statutory and non-statutory sites and other areas with biodiversity value or potential, and they are mainly identified from local plans and objectives. If a habitat is within such a target area, a multiplier is applied to increase its value.

Difficulty of Creation and Restoration

The risks associated with creating new or enhancing existing habitats, are known as difficulty factors; for example, where habitats fail to establish owing to natural changes in local conditions, incorrect management or for unknown reasons. The statutory biodiversity metric contains default values for each habitat based on the average difficulty of creating or enhancing a habitat. Occasionally, under exceptional circumstances, these can be modified, but any deviation from the default value must be fully justified.

Time to Target Condition

There is often a lag between a habitat being removed and the new compensation habitats achieving their target condition. This gives reduced biodiversity value for a time. The statutory biodiversity metric preassigns the time to target condition based on good practice and typical conditions, and assigns a multiplier based on the number of years required to achieve it.

Using bespoke techniques under unique conditions, or creating compensation habitats prior to impacts taking place, the time to target condition can be adjusted. Any changes must again be fully justified.

Off-site Risk

Sometimes it is not possible to compensate adequately for loss of biodiversity within the site boundary, so off-site compensation is required. If the off-site compensation is a significant distance from the development site, then there will be a local loss of biodiversity and a multiplier is applied to any off-site compensation.

BIODIVERSITY ASSESSMENT

Baseline:

The sites baseline BNG value was calculated using the Statutory BNG metric and UKHabs v2 methodology. This was shown on Figure 2.

The baseline value for the site is as at 18.02.2026. This is the date that our assessment was undertaken. We consider there will have been no substantive changes to habitat condition at the time of the planning application being made.

We are not aware of any habitat features which have been purposefully degraded after 30th January 2020.

We consider planning permission, if granted, would be subject to the biodiversity gain condition

The type, area and distinctiveness values are shown on Table 1.



Habitat Parcel	Habitat	Area/ Length	Distinctiveness	Notes
Modified grassland	No	2.2118	Low	Modified grassland short mown species poor
Developed land; sealed surface	No	0.3709	V.Low	Developed land; sealed surface- paths and roads
Other woodland; mixed	No	0.0736	Medium	Other woodland; mixed- Plantation woodland, mixed species with modified grassland beneath it. Not other deciduous woodland as not Sycamore dominated but also not LMDW as no understory. Does not match any specific UK Habs woodland habitat so defaults to Other woodland; mixed
Lowland mixed deciduous woodland	No	0.1375	High	Lowland mixed deciduous woodland- planted woodland, single age but with bramble woodland understory developing. Mixed species so not other broadleaf woodland
Urban tree	No	0.228	Medium	Urban trees in parkland
Native hedgerow with trees	-	0.018	Medium	Privet hedge with two standard trees within it. Trees are valued at baseline, even though in hedge, as assumed to be removed. One medium and one small. <u>Small tree should not be recorded in a hedgerow with trees even if removed under BNG guidelines but is included at this stage to inform impact assessment.</u>
Native hedgerow	-	0.027	Low	Blackthorn and hawthorn unmanaged

The UK Habs V2 habitat survey has been used to identify relevant habitat areas and linear habitat areas.

These habitats have been input into the statutory biodiversity metric calculator R1 and indicate a total of 7.73 habitat area units and 0.38 terrestrial linear units. The results of the calculations are presented in the full biodiversity assessment calculation in the Excel document 'Home Group Barfs Road Distington BNG'.

The condition assessments for each of the area and linear habitats are presented in Appendix A. No deviations have been made from the default methods for baseline habitats assessment.

Change in Biodiversity Value

Urban trees have been valued pre and post development. Some trees are retained in POS and are marked as retained. Some trees are felled, and are marked as lost. Some trees are incorporated into gardens, these are also marked as lost under BNG rules.

BNG tree size	DBH	Retained - number	Retained tree IDs	Lost - number	Lost tree IDs
Small (S)	>75-300 mm	8	T1, T4, T22, T23, T24, T25, T28, T29	15	T2, T6, T8, T9, T10, T11, T12, T14, T15, T19, T20, T21, T26, T27, T30
Medium (M)	>300-600 mm	3	T3, T5, T13	3	T16, T17, T18
Large (L)	>600-900 mm	1	T7	0	-
Very Large (VL)	>900 mm	0	-	0	-
Total		12		18	

Size	Retained	Lost	Total
Small	8	15	23
Medium	3	3	6
Large	1	0	1
Very Large	0	0	0
Total	12	18	30

New tree planting to POS is undertaken and trees are valued as small size and moderate condition.

Planted garden areas are measured and recorded as vegetated garden. These include grass lawns and introduced shrub areas.

POS grassland will be a mixture of "flowering lawn" and "wildflower" type planting. With appropriate management a reasonably floristically diverse sward should develop. Grassland is therefore valued as other neutral grassland in moderate condition.

New mixed scrub is planted to the POS boundaries and existing woodland is retained in its current condition.

New native hedgerow is planted to the edge of the POS.

The scheme delivers a BNG gain of 19.38% for area habitats and 166.45% for hedgerows.

Trading rules are not met due to the net loss of “urban trees”.

0.31 units of urban tree or a higher distinctiveness habitat will be required to meet trading rules.

Table 2. Change in Biodiversity Units Calculation

On-site baseline	Area habitat units	7.37			
	Hedgerow units	0.38			
	Watercourse units	0.00			
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	8.79			
	Hedgerow units	1.01			
	Watercourse units	0.00			
On-site net change (units & percentage)	Area habitat units	1.43	19.38%		
	Hedgerow units	0.63	166.45%		
	Watercourse units	0.00	0.00%		
Off-site baseline	Area habitat units	0.00			
	Hedgerow units	0.00			
	Watercourse units	0.00			
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00			
	Hedgerow units	0.00			
	Watercourse units	0.00			
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%		
	Hedgerow units	0.00	0.00%		
	Watercourse units	0.00	0.00%		
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	1.43			
	Hedgerow units	0.63			
	Watercourse units	0.00			
Spatial risk multiplier (SRM) deductions	Area habitat units	0.00			
	Hedgerow units	0.00			
	Watercourse units	0.00			
FINAL RESULTS					
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	1.43			
	Hedgerow units	0.63			
	Watercourse units	0.00			
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	19.38%			
	Hedgerow units	166.45%			
	Watercourse units	0.00%			
Trading rules satisfied?	No - Check Trading Summaries ▲				
Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Area habitat units	10.00%	7.37	8.10	0.00	No additional area habitat units required to meet target ✓
Hedgerow units	10.00%	0.38	0.42	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓
Input errors/rule breaks present in metric ▲					

REFERENCES

Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2023), UK Habitat Classification - Habitat Definitions V2.01 at <http://ukhab.org>

Natural England 2023. Natural England The Statutory Biodiversity Metric User Guide (draft)

APPENDIX A – BASELINE DETAILED CONDITION ASSESSMENTS

This appendix presents the assessment of the post-development habitats against the condition sheets in the statutory biodiversity metric technical supplement published by Natural England, 2023. Any deviations from the published guidance is explained and justified.

UK Hab	Condition Sheet	Other Habitat Criteria Score									Total Score	Condition Assessment	Notes
		C1	C2	C3	C4	C5	C6	C7	C8	C9			
Modified Grassland	GRASSLAND: Low distinctiveness	F	F	P	P	F	P	P			4	Poor	Short mown
Developed Land; Sealed Surface	Not assessed										-	-	Paths
Urban trees	URBAN TREES	P	P	F	P	F	P				4	Moderate	Standard trees within modified grassland
Key: P – Criteria passed F – Criteria failed													
Appendix Table A1: Condition Assessment for Area Habitats													

UK Hab	Hedgerow Criteria Score										Condition Assessment	Notes
	A1	A2	B1	B2	C1	C2	D1	D2	E1*	E2*		
Native Hedgerow with trees	P	P	P	P	F	P	P	P	F	P	Good	Two trees within privet hedge
Native Hedgerow	P	P	P	P	F	P	P	P	-	-	Good	Blackthorn and Hawthorn unmanaged
Key: P – Criteria passed F – Criteria failed * - Application to Hedgerows with trees only												
Appendix Table A2: Hedgerow Condition Assessment												

UK Hab	Condition Sheet	Other Habitat Criteria Score													Total Score	Condition Assessment	Notes
		C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	C11	C12	C13			
Lowland mixed deciduous woodland	WOODLAND AND FOREST	1	3	3	3	3	2	1	3	1	1	1	1	2	25	Poor	Bramble to understory more indicative of Lowland mixed deciduous woodland
Other woodland mixed	WOODLAND AND FOREST	1	3	3	3	3	1	1	3	1	1	1	1	2	24	Poor	No understory, modified grassland under trees so not Lowland mixed deciduous woodland but group of trees forms woodland
Key to woodland condition assessment: 3 (points) = Good 2 (points) = Moderate 1 (point) = Poor Total score >32 – Good Total score 26 – 32 – Moderate Total score <26 – Poor																	
Appendix Table A3: Woodland Condition Assessment																	

APPENDIX B – POST DEVELOPMENT DETAILED CONDITION ASSESSMENTS

This appendix presents the assessment of the post-development habitats against the condition sheets in the statutory biodiversity metric technical supplement published by Natural England, 2023. Any deviations from the published guidance is explained and justified.

UK Hab	Condition Sheet	Other Habitat Criteria Score									Total Score	Condition Assessment	Notes
		C1	C2	C3	C4	C5	C6	C7	C8	C9			
Other Neutral Grassland	GRASSLAND: Moderate and High distinctiveness	P	P	F	P	P	F				4	Moderate	Flowering lawn and meadow to POS
Developed Land; Sealed Surface	Not assessed										-	-	
Urban trees	URBAN TREES	P	P	F	P	F	P				4	Moderate	Standard trees Native
Urban trees	URBAN TREES	F	P	F	P	F	P				3	Moderate	Standard trees Non Native
Mixed Scrub	Scrub	P	F	P	P	F					3	Moderate	Mixed Scrub
Vegetated Garden	Not assessed										-	-	
Key: P – Criteria passed F – Criteria failed													
Appendix Table B1: Condition Assessment for Area Habitats													

UK Hab	Hedgerow Criteria Score										Condition Assessment	Notes
	A1	A2	B1	B2	C1	C2	D1	D2	E1*	E2*		
Native Hedgerow	F	F	P	P	F	F	P	F	-	-	Poor	Needs only to meet poor condition may be higher
Key: P – Criteria passed F – Criteria failed * - Application to Hedgerows with trees only												
Appendix Table B2: Hedgerow Condition Assessment												



Modified grassland with trees



Other woodland; mixed has no understory other than modified grassland



Lowland mixed deciduous woodland has a
bramble understory



