

Former Tannery Building, Haverigg Road, Millom LA18 4NG

PRELIMINARY ASSESSMENT OF BIODIVERSITY NET GAIN

April 2025

ERAP (Consultant Ecologists) Ltd Reference: 2025-007b

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Document Control

Survey Type:	Surveyors	Survey Date(s)
UK Habitat Classification Survey (including Condition Assessments of habitats) for On-site Habitats	Rachel Brown B.Sc. (Hons) Ecologist	5 th March 2025
Reporting	Personnel	Date
Author	Rachel Brown B.Sc. (Hons) Ecologist	10 th March 2025
Signature(s)		
Checked by	Victoria Burrows B.Sc. (Hons) M.Sc. CEnv MCIEEM	6 th April 2025
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1.0 INTRODUCTION

1.1 Background and Rationale

- 1.1.1 ERAP (Consultant Ecologists) Ltd was commissioned to carry out an assessment of Biodiversity Net Gain (BNG) at former tannery building off Haverigg Road, Millom LA18 4NG (hereafter the 'site'). The Ordnance Survey (OS) grid reference at the centre of the site is SD 16330 79042.
- 1.1.2 The assessment was requested to inform a planning application proposing the demolition of the building and clearance of the site and use of the site as a storage yard.
- 1.1.3 This BNG assessment has been prepared to provide an assessment of the biodiversity value of the baseline of the site, an assessment of the value of post-development habitats based on the site proposals, and provides guidance in relation to the requirements to attain a net gain in accordance with *Biodiversity Net Gain: Good Practice Principles for Development* (CIEEM, 2016).
- 1.1.4 This report also advises on how compliance with Chapter 15, paragraph 193(d) of the *National Planning Policy Framework* (NPPF) (Ministry of Housing, Communities & Local Government, 2024)¹ can be achieved, which states '*opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate*'.

1.2 Site Description

- 1.2.1 An aerial image of the site is appended at **Figure 1**.
- 1.2.2 The total site area is **0.0703 hectares²**.
- 1.2.3 The approximately 0.07 hectare site is located on the outskirts of the village of Haverigg, Millom and comprises a vacant derelict building and an area of unmanaged neutral grassland and Bramble scrub.
- 1.2.4 The habitats present within the site are described and assessed in *2025-007 Former Tannery Building, Haverigg Road, Millom, Ecological Survey and Assessment* (ERAP (Consultant Ecologists) Ltd, 2025), hereafter referred to as the 'ecology report'. A summary of the habitats present within the site is presented at **Section 3.1** of this report.

1.3 Proposed Development Description

- 1.3.1 The assessment has been requested to inform a planning application proposing the demolition of the building and clearance of the site and use of the site as a storage yard. The proposals are presented at *Site Plan as Proposed. Demolition of Former Tannery Building & Formation of Storage Compounds. The Old Tannery, Haverigg Industrial Estate, Poolside, Haverigg, Millom LA18 4NG. Drawing Number: 2393_00_0100* (Convery Prenty Shields Architects, 2024), hereafter the 'proposals plan'.

¹ Hereafter the NPPF

² As measured by ERAP (Consultant Ecologists) Ltd; detail on the methods used to measure the area of the site are presented at **Section 2.0**.

1.4 Scope of Study

- 1.4.1 This report has been prepared to accompany a completed assessment of BNG using *The Statutory Biodiversity Metric Calculation Tool* (Natural England, 2023). The completed Microsoft Excel spreadsheet assessment is presented as a separate document, named '*ERAP Ltd 2025-007b Former Tannery, Haverigg Statutory Biodiversity Metric 10.03.25*', hereafter referred to as the 'BNG Metric'.
- 1.4.2 It is intended that this report provides a transparent assessment to demonstrate the calculation of net gain, based on the reasonable parameters assumed for the proposals (refer to **Section 2.3**). This approach has been applied on a number of other sites ERAP (Consultant Ecologists) Ltd has assisted with and has been accepted by the relevant Local Planning Authorities (LPA) and their ecological advisors to enable a planning application to progress.

2.0 METHOD OF SURVEY

2.1 Habitat Assessment and Mapping

Baseline Habitats

- 2.1.1 A Phase 1 Habitat Survey including an assessment in accordance with the UKHab and condition assessments of the habitats present was carried out by Rachel Brown on 5th March 2025. The weather was dry with sunny intervals, a light air (Beaufort scale 1) and a maximum air temperature of 14°C.
- 2.1.2 On site habitat mapping was assisted via use of GPS technology and QField on-site mapping software, using *Site Plan as Existing. Demolition of Former Tannery Building & Formation of Storage Compounds. The Old Tannery, Haverigg Industrial Estate, Poolside, Haverigg, Millom LA18 4NG. Drawing Number: 2393_00_010* (Convery Prently Shields Architects, 2024) and *ESRI World Imagery* as base plans. This plan has been provided to ERAP (Consultant Ecologists) Ltd without spatial referencing; the plan has been inputted into QGIS and an affine transformation completed to ensure it is accurate in accordance with *ESRI World Imagery*.
- 2.1.3 Each of the habitats within the site has been assessed in accordance with the UKHab to determine each habitat type present. This has allowed a reliable classification of habitats in accordance with those used by the BNG Metric.
- 2.1.4 The UKHab has been designed to function at two scales: fine scale (25m² or 5 metres length) and large scale (400m² or 20m² length). It has been considered for the purposes of this survey (where the UKHab has been used to inform the BNG calculation of a relatively small area) that a finer scale of 5m² is appropriate for the classification of habitats.
- 2.1.5 A plan showing the baseline habitats present within the site in accordance with UKHab symbology is appended at **Figure 2**.
- 2.1.6 Condition Assessments for each of the habitats present within the site have been completed in accordance with *The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology* (Natural England, November 2023) and are appended at **Section 7.2**.

Post-development Habitats

- 2.1.7 The post development habitats have been calculated using the proposals plan. This plan has been provided to ERAP (Consultant Ecologists) Ltd without spatial referencing; the plan has been inputted into QGIS and an affine transformation completed to ensure it is accurate in accordance with *ESRI World Imagery*.
- 2.1.8 A plan showing the proposed habitats in accordance with UKHab symbology is appended at **Figure 3**.

2.2 Survey and Reporting Limitations

- 2.2.1 All measurements have been either estimated whilst on site or measured using QGIS.
- 2.2.2 The survey was completed in March when plant species may be in a dormant state; the surveyor is experienced in identifying plant species from their vegetative characteristics however, and a reliable assessment of the habitats present was possible.

2.3 Evaluation Methods and Rules Applied

Habitats and Assessment

- 2.3.1 Habitats have been assessed to determine whether they meet those described in *UK Biodiversity Action Plan: Priority Habitat Descriptions* (Maddock, A (ed), 2008); these lists are used to help draw up the statutory lists of Priority Habitats, as required under Section 41 of the *Natural Environment and Rural Communities (NERC) Act 2006*. Where suitable, the ecological value of the habitats present have been assessed using the terms outlined in *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* (CIEEM, 2018).
- 2.3.2 QGIS has been used to calculate the total area / length of each baseline habitat present within the site and the area / length of the proposed habitats at the site.
- 2.3.3 Each habitat has been assessed to determine whether they are 'irreplaceable habitat', defined in NPPF as '*Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen*'. The further detail presented in *The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024* (GOV.UK, 2023) has also been referred to.

Relevant Guidance

- 2.3.4 Government advice on wildlife, as set out in the NPPF and associated government circulars has been taken into consideration.

3.0 SURVEY RESULTS

3.1 Assessment of Baseline Habitats

- 3.1.1 **Table 3.1** provides a summary of the habitats present, their condition assessment result and their area within the site. Condition assessments for each habitat are appended at **Section 7.2**.

Table 3.1: Summary of Baseline Area Based Habitats within the Site

Habitat Reference	UK Habitat Classification Type	BNG Habitat Equivalent	BNG Habitat Distinctiveness	Condition Assessment Result	Area (ha)
Habitat 1 Building	u1b5 – buildings	Urban – developed land; sealed surface	V. Low	N/A – Other	0.0410
Habitat 2 Grassland	g4 – modified grassland	Grassland – modified grassland	Low	Moderate	0.0188
Habitat 3 Bramble scrub	h3d – Bramble scrub	Heathland and shrub – Bramble scrub	Medium	Condition assessment N/A	0.0105
Total:					0.0703

3.1.2 The baseline BNG score for the site is provided at **Section 5.0**, below.

4.0 POST DEVELOPMENT HABITATS

4.1 Consideration of Mitigation Hierarchy

4.1.1 The ecology report advises:

“In terms of each habitat’s importance in a geographical context³, the Bramble scrub is of ‘site’ value only owing to its likely use by nesting passerine birds. The building and verge of neutral grassland are not considered to hold any importance on a geographical scale.”

4.1.2 The proposals will require the demolition of the derelict building which occupies the majority of the site. It is not considered to be feasible or necessary to carry out the demolition whilst retaining the Bramble scrub.

4.2 Consideration of Proposed Habitats

4.2.1 The proposals plan demonstrates that to make efficient use of the site the whole of the 0.0703 hectares of the site (i.e. 100%) will be developed to hardstanding. The proposed habitat comprises developed land; sealed surface which does not require a condition assessment and is automatically assigned the condition ‘N/A – Other’. This is shown on **Figure 3**, appended and in **Table 4.1**, below.

Table 4.1: Summary of Area-based Habitats to be Created at the Site

Habitat Type	BNG Equivalent Habitat	Target Condition	Area (ha)
Proposed Habitats			
Habitat A Hardstanding	Urban – developed land; sealed surface	N/A - Other	0.0708
Total			0.0708

³ Using the terms presented at Section 4.7 of *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* (CIEEM, 2018), i.e. International and European, National, Regional, Local Authority-wide area, River Basin District, Estuarine system / Coastal cell or Local. The term ‘site’ value is additionally used to highlight ecological features considered to be of importance in the context of the wider site habitats, but which are of negligible value in the context of the local area.

5.0 HEADLINE RESULTS, EVALUATION AND CONCLUSION

5.1 The headline results of the BNG Metric are presented at **Table 5.1** below.

Table 5.1: Results of Statutory Biodiversity Metric Calculation Tool

On-site Baseline	Habitat units	0.12	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site Post Intervention	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units % percentage)	Habitat units	-0.12	100.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Total Net Unit Change	Habitat units	-0.12	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total Net % Change	Habitat units	-100.00%	
	Hedgerow units	0.00%	
	Watercourse units	0.00%	

Trading Rules Satisfied?	No
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Unit Type	Target	Baseline Units	Units Required	Unit Deficit	Comment
Habitat units	10%	0.12	0.13	0.13	
Hedgerow units	10%	0.00	0.00	0.00	No additional hedgerow units required to meet target
Watercourse units	10%	0.00	0.00	0.00	No additional watercourse units required to meet target

5.2 A net gain for area-based habitats is not demonstrated by the BNG Metric and, as a result, the trading rules are not satisfied.

5.3 As statutory net gain is not attained and there is an intention to make efficient use of the site then the following options are available (a combination of the approaches outlined below may be also appropriate):

- Enhancement of off-site habitats to compensate for the loss of units associated with the proposed development; and / or
- Agreeing a biodiversity payment for the deficit of habitat units associated with the site with a habitat bank or other similar provider.

5.4 It is essential that, in addition to the result of the BNG Metric, the assessment of biodiversity net gain takes into account the measures to be accommodated and implemented at the site to secure gains and betterment for biodiversity that the BNG Metric cannot take account of.

5.5 At this site it is advised that the following measures are also considered as part of the assessment of biodiversity net gain:

- Incorporation of opportunities for use by nesting birds (house sparrow) at the margin of the site as described in Section 5.3 of the ecology report.

6.0 REFERENCES

CIEEM, 2016. *Biodiversity Net Gain: Good Practice Principles for Development*, Winchester: CIEEM.

CIEEM, 2018. *Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*, Winchester: Chartered Institute of Ecology and Environmental Management.

Convery Prenty Shields Architects, 2024. *Site Plan as Existing. Demolition of Former Tannery Building & Formation of Storage Compounds. The Old Tannery, Haverigg Industrial Estate, Poolside, Haverigg, Millom LA18 4NG. Drawing Number: 2393_00_010*, Glasgow: Convery Prenty Shields Architects.

Convery Prenty Shields Architects, 2024. *Site Plan as Proposed. Demolition of Former Tannery Building & Formation of Storage Compounds. The Old Tannery, Haverigg Industrial Estate, Poolside, Haverigg, Millom LA18 4NG. Drawing Number: 2393_00_0100*, Glasgow: Convery Prenty Shields Architects.

DEFRA, 2024. *The Statutory Biodiversity Metric User Guide*, London: DEFRA.

ERAP (Consultant Ecologists) Ltd, 2025. *2025-007 Former Tannery Building, Haverigg Road, Millom, Ecological Survey and Assessment*. Chorley: ERAP (Consultant Ecologists) Ltd.

GOV.UK, 2023. *The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024*. [Online]
Available at: <https://www.gov.uk/government/publications/the-biodiversity-gain-requirements-irreplaceable-habitat-regulations-2024>
[Accessed 10 March 2025].

Maddock, A (ed), 2008. *UK Biodiversity Action Plan: Priority Habitat Descriptions*. [Online]
Available at: <http://jncc.defra.gov.uk/page-5718>

Ministry of Housing, Communities & Local Government, 2024. *National Planning Policy Framework*. London: H.M.S.O.

Natural England, 2023. *The Statutory Biodiversity Metric Calculation Tool*. [Online]
Available at: <http://publications.naturalengland.org.uk/publication/6049804846366720>
[Accessed 10 March 2025].

Natural England, November 2023. *The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology*, Peterborough: Natural England.

7.0 APPENDIX: PHOTOGRAPHS, CONDITION ASSESSMENTS AND FIGURES

7.1 Photographs of Baseline Habitats



Photo 1: Habitat 1: Building, Habitat 2: Grassland and Habitat 3: Bramble scrub



Photo 2: Habitat 2: Grassland



Photo 3: Habitat 3: Bramble scrub

7.2 Condition Assessments of Baseline Habitats

Habitat 1: Building does not require a condition assessment and is automatically assigned the condition 'N/A – Other'.

Habitat 3: Bramble scrub does not require a condition assessment and is automatically assigned the condition 'Condition assessment N/A'

Table 7.1: Condition Assessments for Habitat 2: Grassland

Habitat Reference	A	B	C	D	E	F	G	Total No. of Criterion Passed	Condition Assessment Result ¹
Habitat 2: Grassland	Yes	No	Yes	Yes	No	Yes	Yes	5	Moderate
Good: Passes 6 or 7 criteria including essential criterion A									
Moderate: Passes 4 or 5 criteria including essential criterion A									
Poor: Passes 3 or fewer criteria OR passes 4 to 6 criteria, but failing criterion A									
Condition Assessment Criteria									
A. There are 6 to 8 vascular plant species per m2 present, including at least 2 forbs (this may include those listed in below). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m2 (excluding those listed below), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet. <i>Plant Species:</i> Creeping Thistle (<i>Cirsium arvense</i>), Spear Thistle (<i>Cirsium vulgare</i>), Curled Dock (<i>Rumex crispus</i>), Broad-leaved Dock (<i>Rumex obtusifolius</i>), Common Nettle (<i>Urtica dioica</i>), Creeping Buttercup (<i>Ranunculus repens</i>), Greater Plantain (<i>Plantago major</i>), White Clover (<i>Trifolium repens</i>) and Cow Parsley (<i>Anthriscus sylvestris</i>).									
B. Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20 per cent is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.									
C. Any scrub present accounts for less than 20% of total grassland area (some scattered scrub such as Bramble may be present). Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.									
D. Physical damage evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.									
E. Cover of bare ground between 1% and 10%, including localised areas, for example, rabbit warrens. For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover									
F. Cover of Bracken less than 20%.									
G. There is an absence of invasive non-native species as listed on Schedule 9 of <i>Wildlife and Countryside Act 1981</i> (as amended). This is assessed for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement									

7.3 Figures

Figure 1: Aerial Image of the Site and its Surroundings

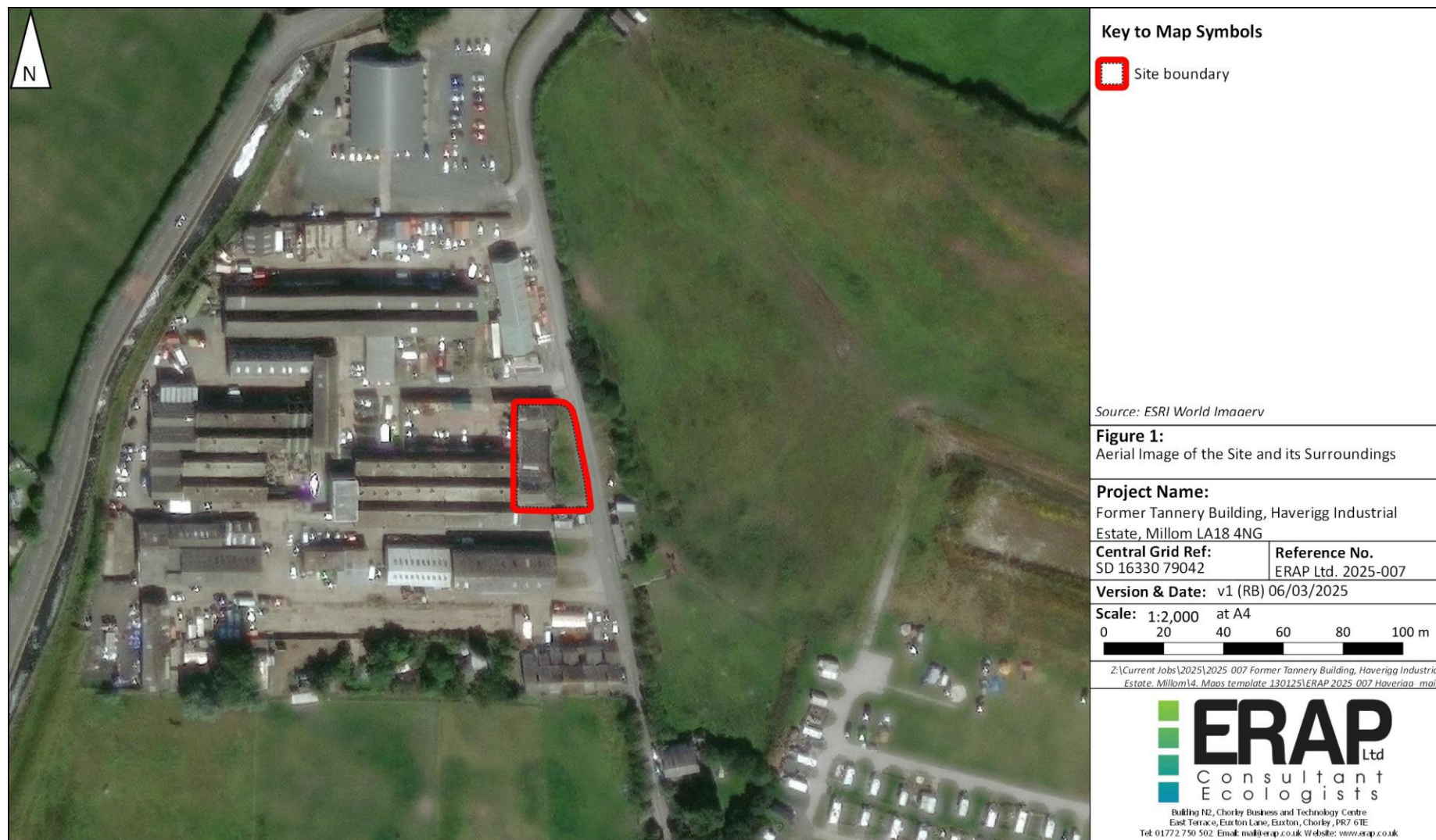


Figure 2: UKHab Plan of Baseline Habitats

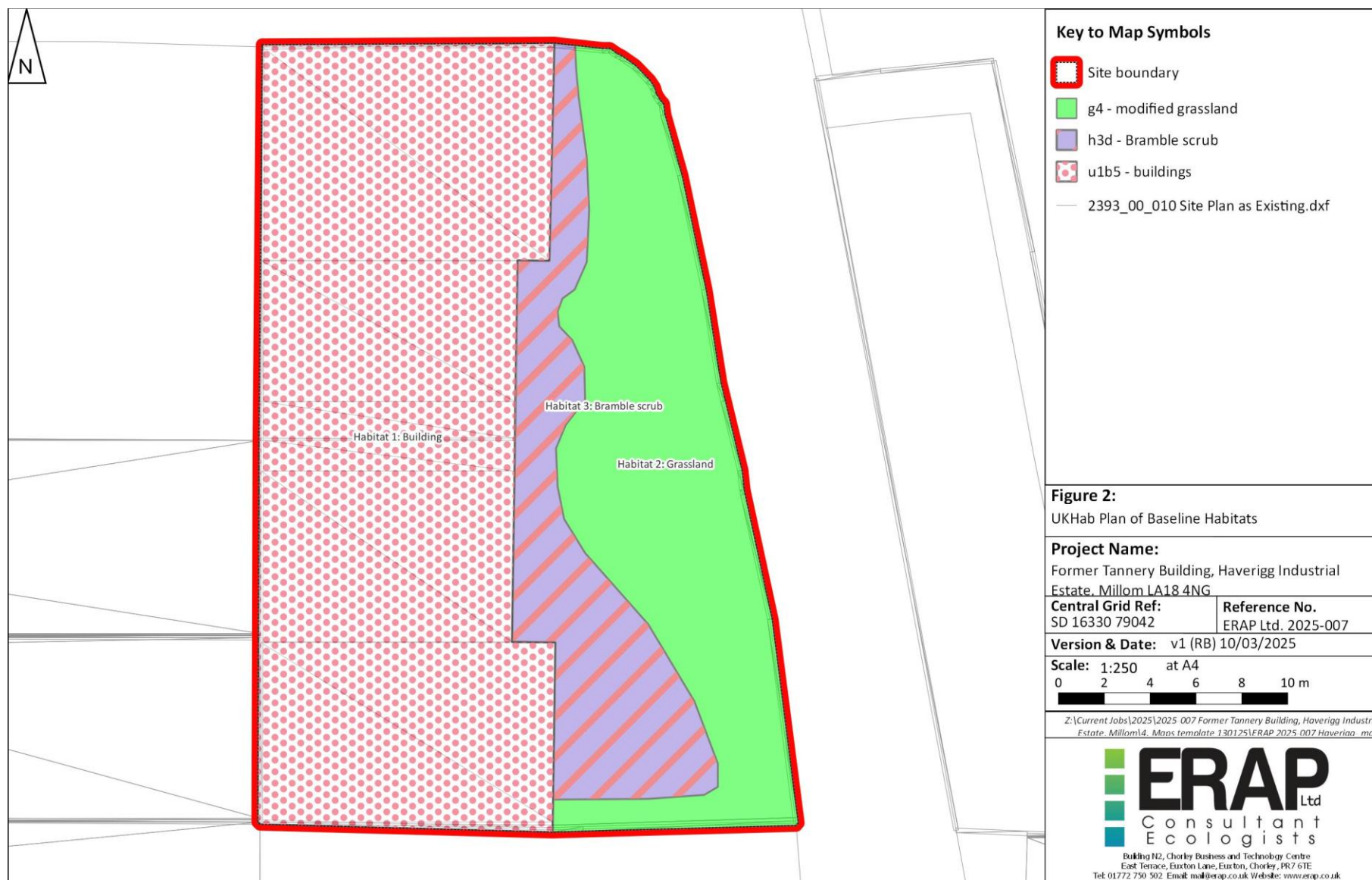


Figure 3: UKHab Plan of Proposed Habitats

