



Hunter Rise, Beckermeth, Cumbria
Biodiversity Net Gain Report

Document Control

Client:	Wilson Architects
Project Title:	Hunter Rise, Beckermeth, Cumbria
Report Title:	Biodiversity Net Gain Report
Report Ref.:	P2767_01
Version:	V0
Status:	Final
Revision Comments:	-
Author:	CM BSc (Hons), MSc
Technical Review:	AC BSc (Hons), MSc MCIEEM
Final Review	TE BSc (Hons) MCIEEM
Issued to Client:	12 May 2025

Disclaimer

Elton Ecology Ltd ("Elton Ecology") confirms that the evidence and opinions expressed in this document are true, professional and bona fide; prepared and provided in accordance with The Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. This report and the ecological data presented is subject to validity timescales with reference to guidance from The Chartered Institute of Ecology and Environmental Management: *Advice Note on The Lifespan of Ecological Reports & Surveys* (2019).

This report has been prepared for the sole use of the client and, unless otherwise agreed in writing by Elton Ecology Ltd, may not be relied upon by any other party. Elton Ecology Ltd accepts no liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared. No third party may reproduce, retain or disclose this document without the prior written consent of Elton Ecology Ltd.

The assessments given are based on the site at the time of survey/ the commissioned ecological work was undertaken and assume that the site will continue to be used and maintained at its purpose and state at that time without significant change. Where conclusions and recommendations made are based on information provided by others, an assumption has been made that all relevant information has been provided from parties of which it has been requested, and this information has not been independently verified by Elton Ecology Ltd.

Elton Ecology Ltd standard terms and conditions apply to this report. Nothing in this report constitutes legal opinion. If legal opinion is required, the advice of a qualified legal professional should be sought.

Built structures and trees are assessed within the context of ecological matters only, nothing in this report constitutes structural or arboriculture opinion or advice.

Where/ if this report contains record locations of species protected due to human interference, such as badger (Protection of Badgers Act (1992)) these records are confidential. Prior to release into the public domain any specific mention of the locations of the species must be removed.

Contents

1. Summary.....	4
2. Introduction	5
Background	5
Relevant Documents	5
Site Description	5
Development Proposals	5
Planning status of project, certainty of design and assumptions made	5
Aims, Objectives & Scope	5
Planning Policy and Legislation.....	6
3. Methodology	7
Personnel.....	7
Desk Study	7
Important Ecological Features	7
Field Survey.....	7
UKHab & Condition Assessment Survey.....	7
Biodiversity Net Gain Metric Calculation	7
Classification and Measurement of Habitats	8
Strategic Significance	8
Bespoke Compensation Agreed for Unacceptable Losses	9
Temporal Multiplier	9
Limitations.....	10
4. Results	11
Baseline Habitats.....	11
Proposed Design	16
Biodiversity Metric Results	18
5. Conclusion	19
6. References.....	20
7. Figures	21
Appendix 1: Planning Policy & Legislation Summary	22
National Planning Policy Framework 2024	22
The Environment Act 2021	23
Appendix 2: Photographs.....	24

Tables

Table 1: Summary	4
Table 2: On Site Habitat Baseline Areas	12
Table 3: Condition Assessment – Low Distinctiveness Grassland (Adapted from Defra, 2024)	13
Table 4: On Site Hedgerow Baseline	14
Table 5: Condition Assessment – Line of Trees (Adapted from Defra, 2024)	15
Table 6: On site Habitat Creation.....	17
Table 7: On Site Hedgerow Creation	17
Table 8: Summary of Biodiversity Metric Output.....	18

Figures

Figure 1: Site Location Plan (Overleaf)	21
Figure 2: Baseline Habitat Plan (Overleaf)	21
Figure 3: Baseline Habitat Condition Plan (Overleaf)	21
Figure 4: Baseline Habitat Retention Plan (Overleaf)	21
Figure 5: Proposed Habitat Plan (Overleaf)	21
Figure 6: Proposed Habitat Condition Plan (Overleaf)	21

1. Summary

Table 1: Summary

Report Purpose	The objective of the present Biodiversity Net Gain (BNG) report is to provide an assessment as to whether the proposed development can deliver BNG or not for the design option(s) being considered.
Methodology	• A UKHab and condition assessment survey was carried out of the site on the 6th March 2025 with reference to best practice guidelines by a suitably qualified ecologist. • A biodiversity metric calculation was made, using the prevailing biodiversity metric calculation spreadsheet at the time of writing (DEFRA Statutory Metric).
Results & Conclusions	Via a scheme of hedgerow planting, assessment has shown that a biodiversity net gain in hedgerows (28.82%) can be delivered on site. Following best practice guidelines for use of the Statutory Biodiversity Metric, assessment has shown a total net loss post-development of -0.56 habitat units (-57.77%), this equates to a deficit of 0.76 habitat units below the biodiversity net gain target of 10%. Trading rules were not satisfied. It is considered that the on-site delivery of the 0.76 habitat units to deliver a 10% net gain would not be feasible. It is therefore recommended that off-site habitat compensation options are explored, such as exploring habitat creation/enhancement on land also under the ownership of the applicant, or via purchasing the biodiversity units from a third-party habitat bank.

2. Introduction

Background

- 2.1. Elton Ecology Ltd was commissioned by Wilson Architects to conduct a Biodiversity Net Gain (BNG) Study of the site known as Hunter Rise, Beckermat, Cumbria, hereinafter referred to as 'the site'.

Relevant Documents

- 2.2. The present assessment has been informed by the following documents:
- Proposed Site Plan (Drawing Number: 24121-P-004) (Wilson Architects, received via email 1st May 2025)
 - Tree Constraints Plan (Plan Reference and Number: 250207 25024 TCP V1 OE-001) (Castle Surveys Ltd, February 2025)
 - Tree Schedule (Reference: 250206 25024 TS V1) (Castle Surveys Ltd, 6th February 2025)

Site Description

- 2.3. The site is located at Hunter Rise, Beckermat, CA21 2YP (Figure 1: Site Location Plan) (central OS grid reference: NY 01717 06794). The site comprises a sheep-grazed field.

Development Proposals

- 2.4. The development proposals include the erection of nine residential dwellings with associated hard and soft landscaping.

Planning status of project, certainty of design and assumptions made

- 2.5. The present strategy has been prepared to support a planning application, based on the Proposed Site Plan (2025).
- 2.6. As stated in the 'Limitations' section, necessary assumptions have been made at this stage regarding the types and extents of habitats that will and can be retained, enhanced and created.

Aims, Objectives & Scope

- 2.7. With reference to the Development Proposals and best practice BNG reporting guidelines (CIEEM, 2021), the objectives & scope of the present strategy are to provide:
- An assessment as to whether the project can feasibly deliver BNG or not for the options being considered;
 - Advice for the project to maximise its ability to deliver BNG considering factors such as location, design, construction methods and programme (where known/relevant);
 - If on-site BNG can't be achieved, consideration of the potential for off-site delivery of BNG, either securing land in close proximity to the project site or other alternatives, including more distant land under direct control or a brokered agreement; and

- Where, following a review of the BNG Principles, the delivery of project-wide BNG as an outcome is not considered possible (e.g., as a result of impacts to irreplaceable habitats or other site constraints), a record of the reasons and next steps towards delivering biodiversity gains elsewhere through the project.

Planning Policy and Legislation

- 2.8. A summary of biodiversity planning policies and wildlife legislation relevant to the site is provided in Appendix 1.
- 2.9. The site is covered by the Cumbria Biodiversity Action Plan (BAP).

3. Methodology

Personnel

- 3.1. The UKHab & condition assessment survey was carried out by Ecologist CM BSc (Hons), MSc, accredited agent on Natural England Bat Licence Reference Number: 2018-33647-CLS-CLS. CM holds a Natural England Level 1 Great Crested Newt Licence (CL08) (reference number: 2024-12521-CL08-GCN), is a Qualifying member of CIEEM, has attended formal training in UKHab survey, Biodiversity Net Gain, and botanical species identification, and is experienced in undertaking ecology surveys, GIS mapping, and report writing. CM assisted with the UKHab & condition assessment survey.
- 3.2. Quality Assurance was carried out by Associate Ecologist AC BSc (Hons) MSc MCIEEM, AC has over twenty-years' experience of Ecological Consultancy.
- 3.3. The final review was carried out by TE BSc (Hons), MCIEEM. TE has professional experience in ecological consultancy since 2013, including Protected Species Survey, Extended UKHab Habitat Survey and report writing. TE is trained in a wide variety of protected species survey, including holding Natural England class licences for bats (Level 2 Licence CL18), barn owl *Tyto alba*, great crested newt (level 1), and dormice *Muscardinus avellanarius* (level 1). TE is trained in botanical species identification and holds a Level 3 Botanical Society of Britain and Ireland (BSBI) Field Identification Skills Certificate.

Desk Study

Important Ecological Features

- 3.4. A desk study was carried within the Preliminary Ecological Appraisal (Elton Ecology, 2025) and should be read in conjunction with the present report.

Field Survey

UKHab & Condition Assessment Survey

- 3.5. A UKHab and condition assessment survey was carried out of the site on 6th March 2025 with reference to best practice guidelines from UKHab Ltd (2023). The site was walked over, and the habitats present classified based on key indicator species present.
- 3.6. The condition assessment was carried out with reference to guidance within the Statutory Biodiversity Metric Condition Sheets and Technical Supplement (Defra, 2024). The condition of each habitat was assessed by scoring each habitat parcel against the criteria set out in the Statutory Biodiversity Metric Habitat Condition Assessment Sheets. A condition score was assigned to each habitat parcel based on a range of positive and negative indicators of quality against the optimum ecological state for the habitat, such as a grassland having species richness (positive) or the presence of invasive non-native plants (negative). This is used as an indicator for whether the habitat is a good or poor example of its habitat type/distinctiveness, and to inform future management for ecological enhancement where applicable.

Biodiversity Net Gain Metric Calculation

- 3.7. The prevailing biodiversity metric calculation spreadsheet at the time of writing was used, the Statutory Biodiversity Metric, published 29th November 2023, with reference to the Technical Supplement and User Guide (Defra, 2024).
- 3.8. The Statutory Biodiversity Metric calculates the biodiversity units present as follows:

Baseline Habitats:

Size of Habitat Parcel x Distinctiveness x Condition x Strategic Significance = Baseline Biodiversity Units

Post-intervention Habitats are calculated as above, and then:

x Difficulty x Time to Target Condition x Spatial Risk = Post-intervention Biodiversity Units

The net gain or loss in Biodiversity Units is then calculated as:

Post-intervention units – Baseline units = (+/-) Net Change

- 3.9. As the basis of the calculations, the Statutory Biodiversity Metric requires the user to enter a series of variables for each baseline, enhanced or created habitat parcel. These variables and decisions made are summarised in the sections below and presented in the results section. No river habitats were present at the site, and as such variables relating only to river habitats have not been included.

Classification and Measurement of Habitats

- 3.10. The UK Habitat Classification System (UKHab) (UKHab Ltd, 2023) was used during field surveys and converted to the appropriate habitat classification via the Statutory Metric guidance (Defra, 2024), to complete the broad habitat and habitat type variables of the Statutory Metric calculator.
- 3.11. The habitat areas were mapped via the QGIS geographic information system application using a geo-referenced and ground-checked satellite image of the site.
- 3.12. Post-development habitat areas were measured from the illustrative Proposed Site Plan, georeferenced into QGIS.
- 3.13. Following the Statutory Biodiversity Metric QGIS Template and Import Tool User Guide (Natural England Joint Publication JP039), each habitat parcel was entered into the QGIS Template where the data was exported into the Import Tool to consolidate the data to be entered into the Statutory Metric calculator.

Strategic Significance

- 3.14. This is a score based on whether the location of the habitat is significant for nature. An assessment of this variable requires consideration as to whether the site is located within the relevant biodiversity local strategy, plan or policy, designated sites for nature conservation, and the sites position within the landscape. Strategic Significance was determined with reference to guidance from the Cumbria Biodiversity Action Plan.
- 3.15. With reference to the Department of Environment, Food & Rural Affairs (DEFRA) Policy paper 'Local Nature Recovery Strategies' (LNRS), there are 48 local nature recovery strategy areas covering England¹. The relevant strategy area for the site is Cumbria and the relevant responsible body is the Westmorland and Furness Council².
- 3.16. If no LNRS is available for the local authority area applicable to the site, other relevant documents and criteria are used which can include local published plans, strategies or policies, as listed within the Statutory Biodiversity Metric User Guide Draft on page 25 and any other relevant documents. If the geographic location or type of habitat present is listed

¹ <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>

²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1166611/Map_of_local_nature_recovery_strategy_areas_and_responsible_authorities.pdf

within the other relevant documents, a score of high is assigned to the given habitat area. These include:

- Statutory Designated Sites
- Non-Statutory Designated Sites
- National BAP Priority Habitats
- Local Plan
- Neighbourhood Plan
- Area of Outstanding Natural Beauty/National Landscapes Management Plan
- Local Biodiversity Action Plan
- Species and protected sites conservation strategies
- Green Infrastructure / Tree / Woodland Strategies
- River Basin Management Plans
- Catchment Plans and Catchment Planning Systems
- Habitats Supporting Populations of Notable/ Priority and/or Protected Species
- Biodiversity Opportunity Map (BOM)

3.17. Where there are no relevant documents, professional judgement was used to assign a strategic significance score of either 'medium' or 'low'. If a habitat location or type is not listed within a relevant document and there is a lack of evidence to support a professional judgement of 'medium' strategic significance, a score of 'low' is assigned.

3.18. The relevant planning policy documents are:

- Copeland Local Plan 2021-2039

3.19. The site is not included within the planning policies as a nature conservation priority.

3.20. As detailed in the Copeland Local Plan 2021-2039, the relevant Local Biodiversity Action Plan for the site is the Cumbria Biodiversity Action Plan.

Bespoke Compensation Agreed for Unacceptable Losses

3.21. This is a yes/no decision cell to indicate whether bespoke compensation has been agreed with decision makers for any losses in very high distinctiveness habitats.

Temporal Multiplier

3.22. Within the temporal multiplier for each created/ enhanced habitat parcel the metric requires the user to enter the following variables:

- Habitat created in advance/ years: The Statutory Metric rewards habitat creation in advance of losses by reducing the temporal risk multipliers added.
- Delay in starting habitat creation/ years. If there will be a significant delay in the creation of a habitat type relative to any losses (e.g. phased development), the

number of full years that the creation will be delayed is entered. The Statutory Metric then adds the number of years to the pre-populated time to target condition, which increases the effect of the risk multiplier.

Limitations

- 3.23. The accuracy of habitat area measurement is limited by the methods by which the baseline data was collected and resolution of development proposal plans. In this instance, baseline habitat areas have been calculated by cross referencing illustrative habitat plans mapped in the field with georeferenced aerial imagery. Post-development habitat areas were measured from the concept landscape plans, georeferenced into QGIS.
- 3.24. Reasonable assumptions have been made with regards to the type/condition of habitats that could be created, which would need to be informed by a detailed Habitat Management and Management Plan.
- 3.25. The Biodiversity Metric uses habitats as a proxy for biodiversity, which is a simplification of the real world. Although informed by evidence and reasoning, the outputs of the Metric are not scientifically precise or absolute values. The generated biodiversity unit scores are a proxy for the relative biodiversity worth of a habitat or site. The metric and its outputs must be interpreted with ecological expertise and a common-sense approach. The metric is an aid to biodiversity decisions.
- 3.26. Hedgerow H1 and treelines TL2-3 were present off-site overhanging the site and were included within the Preliminary Ecological Appraisal Report (Elton Ecology, 2025) relating to the site due to the potential impacts to these habitats that may be caused by the proposed development. With reference to the Statutory Metric User Guide (Defra, 2024), hedgerow H1 and treelines TL2-3 are not included within the red line boundary of the development and are therefore not included within the biodiversity net gain calculation for the site.
- 3.27. All dimensions and distances provided are approximate.
- 3.28. The present study has been informed by the Proposed Site Plan (2025), and as such assumptions have been made regarding the final planned design including the precise extent of proposed landscaping, hardstanding and development footprint.

4. Results

Baseline Habitats

- 4.1. The baseline habitats and condition assessments at the site including the data entered into the biodiversity metric are given in the following tables and mapped on Figure 2: Baseline Habitat Plan. The baseline habitat condition scores and post-development retentions are shown in Figures 3 and 4. The 'consolidated' data is provided in the present report. Non-consolidated data is provided within the completed Biodiversity Metrics. Photographs of the habitats referred to are presented in Appendix 2: Photographs.
- 4.2. Watercourse habitats, including watercourse riparian zones, were not present on site.
- 4.3. No irreplaceable habitats were present on site.
- 4.4. The baseline habitat date was taken to be 6th March 2025, the date of the habitat survey, with no evidence of prior habitat degradation occurring on site.

Table 2: On Site Habitat Baseline Areas

UKHab Habitat Code	UKHab Habitat Classification	Data Entered into Metric					Description	Photograph Ref No. (Appendix 2: Photographs)
		Unique Polygon Reference No.	Area (hectares)	Condition	Strategic Significance	Habitat retained/enhanced/lost		
g4	Modified grassland	1	0.5623	Poor	Area/compensation not in local strategy/ no local strategy	0.0407 ha retained 0.5215 ha lost	The site comprised a sheep-grazed modified grassland with an average of 2 species per m ² and approximately 90% of the sward cover grazed to 5cm in height. Species present included dominant annual meadow-grass <i>Poa annua</i> and rarely present dandelion <i>Taraxacum officinale</i> agg., white clover <i>Trifolium repens</i> , creeping buttercup <i>Ranunculus repens</i> , common mouse-ear <i>Cerastium fontanum</i> , common nettle <i>Urtica dioica</i> , and broadleaved dock <i>Rumex obtusifolius</i> , with locally frequent lesser celandine <i>Ficaria verna</i> present on the south site boundary.	1

Table 3: Condition Assessment – Low Distinctiveness Grassland (Adapted from Defra, 2024)

Condition Sheet:			
Condition Assessment Criteria		Modified grassland:	
		Condition Achieved (Y/N)	Notes/Justification
1	"There must be 6-8 species per m². If a grassland has 9 or more species per m² it should be classified as a medium distinctiveness grassland habitat type. NB - this criterion is essential for achieving moderate condition."	N	2 species per m².
2	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	Approximately 90% of the sward was sheep-grazed to 5cm in height.
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y	No scrub observed.
4	Physical damage is 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.	Y	No damage observed.
5	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Y	Localised areas of bare ground caused by sheep grazing comprising approximately 2% cover.
6	Cover of bracken less than 20%.	Y	No bracken observed.
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Y	No INNS observed.
Essential criterion 1 achieved (Y/N)		N	
Number of criteria passed		5	
Condition Assessment Result	Condition Assessment Score	Score Achieved x/✓	
Passes 6 or 7 of 7 criteria including passing essential criterion 1	Good (3)		
Passes 4 or 5 of 7 criteria including passing essential criterion 1	Moderate (2)		
Passes 0, 1, 2 or 3 of 7 criteria; OR 4, 5 or 6 of criteria but failing criterion 1	Poor (1)	✓	

Table 4: On Site Hedgerow Baseline

UKHab Habitat Code	UKHab Habitat Classification	Data Entered into Metric					Description	Photograph Ref No. (Appendix 2: Photographs)
		Hedgerow No.	Length (km)	Condition	Strategic Significance	Hedgerow retained/enhanced/lost		
w1 33	Line of trees	1	0.03	Moderate	Area/compensation not in local strategy/ no local strategy	0.022 km retained 0.008 km lost	A line of trees approximately 28m in length was present at the southwest site boundary. Species present included abundant hawthorn <i>Crataegus monogyna</i> in the south of the treeline and frequent ash <i>Fraxinus excelsior</i> and sycamore <i>Acer pseudoplatanus</i> trees in the north of the treeline. A canopy gap was present in the south due to the presence of hawthorn stumps.	2

Table 5: Condition Assessment – Line of Trees (Adapted from Defra, 2024)

Condition Sheet: Line of Trees Habitat Types			
Condition Assessment Criteria		Condition Achieved (Y/N)	Notes/Justification
1	More than 70% of trees are native species.	Y	Hawthorn and ash comprise over 70% of trees.
2	Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.	N	Canopy gap of approximately 8m where stumps were present.
3	One or more trees has veteran features and or natural ecological niches for vertebrates and invertebrates, such as presence of standing and attached deadwood, cavities, ivy or loose bark.	Y	Small cavities present on the stumps of the hawthorn stumps and one mature ash tree considered suitable for invertebrates.
4	There is an undisturbed naturally vegetated strip of at least 6 m on both sides to protect the line of trees from farming and other anthropogenic operations.	N	Residential dwelling and garden present within 6m of the south side of the treeline.
5	At least 95% of the trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	Y	Two deadwood stumps present but were considered valuable for wildlife. No evidence of adverse impact on tree health observed.
Number of criteria passed		3	
Condition Categories			
Category/ Weighting (score)	Maximum number of attributes that can fail to meet ‘favourable condition’ criteria		
Good (3)	Passes 5 of 5 criteria		
Moderate (2)	Passes 3 or 4 of 5 criteria	✓	
Poor (1)	Passes 0, 1 or 2 of 5 criteria		

Proposed Design

- 4.5. The proposed design includes the erection of nine residential dwellings with associated hard and soft landscaping.
- 4.6. The proposed values for post-development created habitats at the site entered into the Biodiversity Metric are given in the tables overleaf and mapped on Figure 5: Proposed Habitats Plan. The target conditions for the habitats are shown in Figure 6: Proposed Habitat Target Condition Plan.

Table 6: On site Habitat Creation

Data Entered into Metric						
Broad Habitat	Proposed Habitat	Area (hectares)	Condition	Strategic Significance	Habitat created in advance/years	Delay in starting habitat creation/years
Heathland and scrub	Mixed scrub	0.0132	Poor	Area/compensation not in local strategy/ no local strategy	0	0
Urban	Developed land; sealed surface	0.3374	N/A - Other	Area/compensation not in local strategy/ no local strategy	0	0
Urban	Vegetated garden	0.171	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	0	0
Individual trees	Rural tree	0.0041	Moderate	Area/compensation not in local strategy/ no local strategy	0	0

Table 7: On Site Hedgerow Creation

Data Entered into Metric						
UKHab Classification	Proposed Habitat	Length (km)	Condition	Strategic Significance	Habitat created in advance/years	Delay in starting habitat creation/years
h2a6	Native hedgerow	0.03	Poor	Formally identified in local strategy	0	0

Biodiversity Metric Results

- 4.7. The completed biodiversity metric excel spreadsheet has been issued with the present report and should be read in conjunction with it. The 'headline results' output of the Statutory Biodiversity Metric calculation are presented in Table 8 below.

Table 8: Summary of Biodiversity Metric Output

	Habitat / Hedgerow	Unit
On-site Baseline Units	Habitat	1.12
	Hedgerow	0.12
On-Site Post-Intervention Units	Habitat	0.47
	Hedgerow	0.15
Total Net Unit Change	Habitat	-0.65
	Hedgerow	0.03
On-site net % change	Habitat	-57.77%
	Hedgerow	28.82%
Trading rules satisfied?		No

5. Conclusion

- 5.1. Via a scheme of hedgerow planting, assessment has shown that a biodiversity net gain in hedgerows (28.82%) can be delivered on site.
- 5.2. Following best practice guidelines for use of the Statutory Biodiversity Metric, assessment has shown a total net loss post-development of -0.56 habitat units (-57.77%), this equates to a deficit of 0.76 habitat units below the biodiversity net gain target of 10%. Trading rules were not satisfied.
- 5.3. It is considered that the on-site delivery of the 0.76 habitat units to deliver a 10% net gain would not be feasible. It is therefore recommended that off-site habitat compensation options are explored, such as exploring habitat creation/enhancement on land also under the ownership of the applicant, or via purchasing the biodiversity units from a third-party habitat bank.

6. References

Baker, J. Hoskin, R. Butterworth, T (2019) *Biodiversity Net Gain. Good Practice Principles for Development. A Practical Guide*. CIRIA. ISBN: 978-0-86017-791-3

British Standards Institute (BSI) (2013). *BS 42020:2013 Biodiversity. Code of practice for planning and development*. British Standards Institute, London.

British Standards Institute (BSI) (2021). *BS 8683:2021 Biodiversity. Process for designing and implementing Biodiversity Net Gain — Specification*. British Standards Institute, London.

CIEEM (2017) *Guidelines on Ecological Report Writing*. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2018) *Guidelines for Ecological Impact Assessment in The UK and Ireland*. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2021). *Biodiversity Net Gain Report and Audit Templates*. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

Defra (2024) *The Statutory Biodiversity Metric - User Guide*. Department for Environment, Food & Rural Affairs, February 2024.

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

7. Figures

Figure 1: Site Location Plan (Overleaf)

Figure 2: Baseline Habitat Plan (Overleaf)

Figure 3: Baseline Habitat Condition Plan (Overleaf)

Figure 4: Baseline Habitat Retention Plan (Overleaf)

Figure 5: Proposed Habitat Plan (Overleaf)

Figure 6: Proposed Habitat Condition Plan (Overleaf)



Legend

 Site Boundary

Project:
Hunter Rise, Beckermets, Cumbria

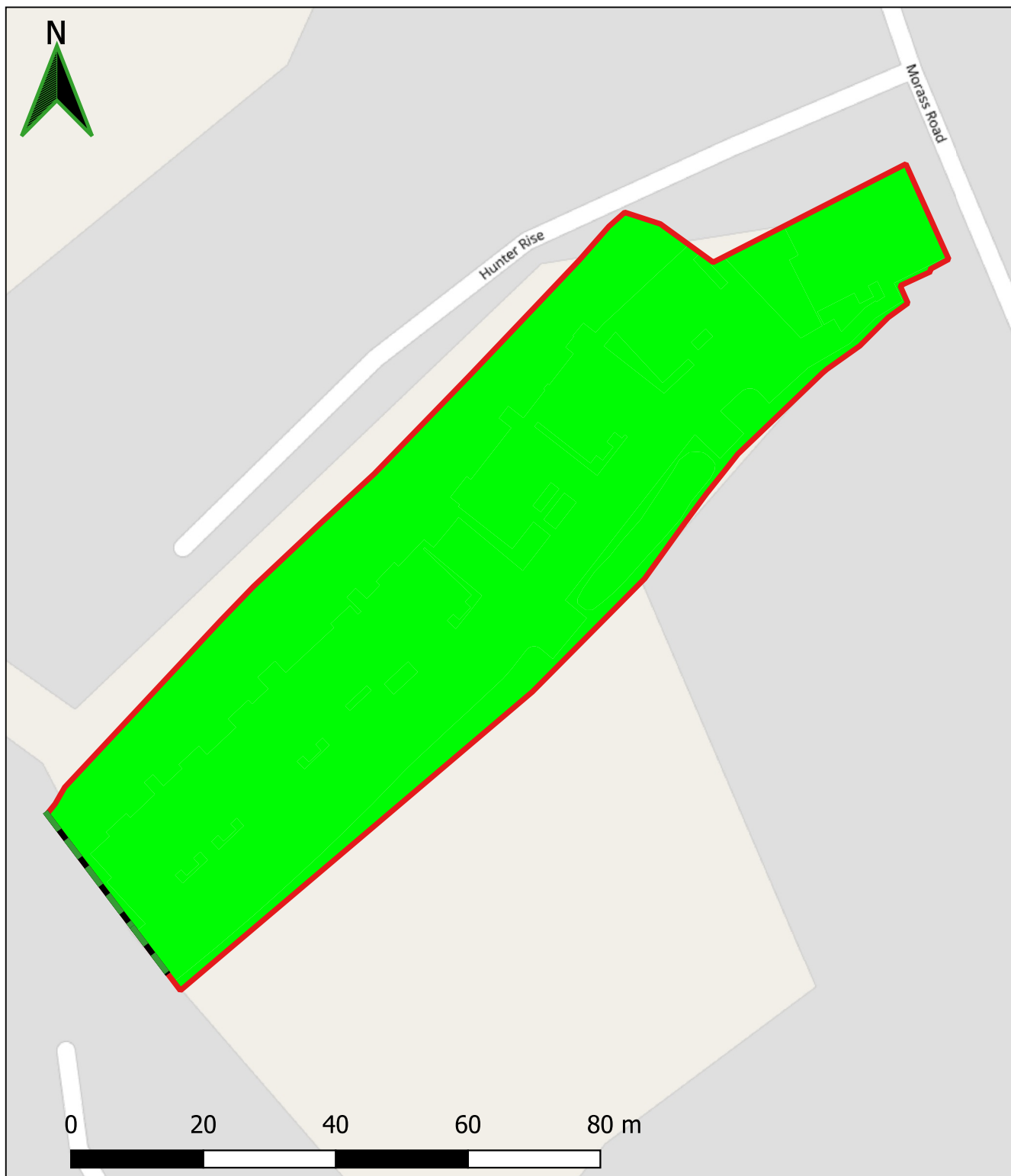
Drawing:
Figure 1: Site Location Plan

Date: 06-05-2025 Version: FINAL
Author: CM Job No: P2767



Contains OS data © Crown copyright and database right 2025. | All dimensions are approximate.

Copyright © Elton Ecology Ltd. | T: 01332 856371
E: hello@elton-ecology.co.uk | W: www.elton-ecology.co.uk



Legend

-  Site Boundary
-  Modified Grassland
-  Line of Trees

Project:
Hunter Rise, Beckermest, Cumbria

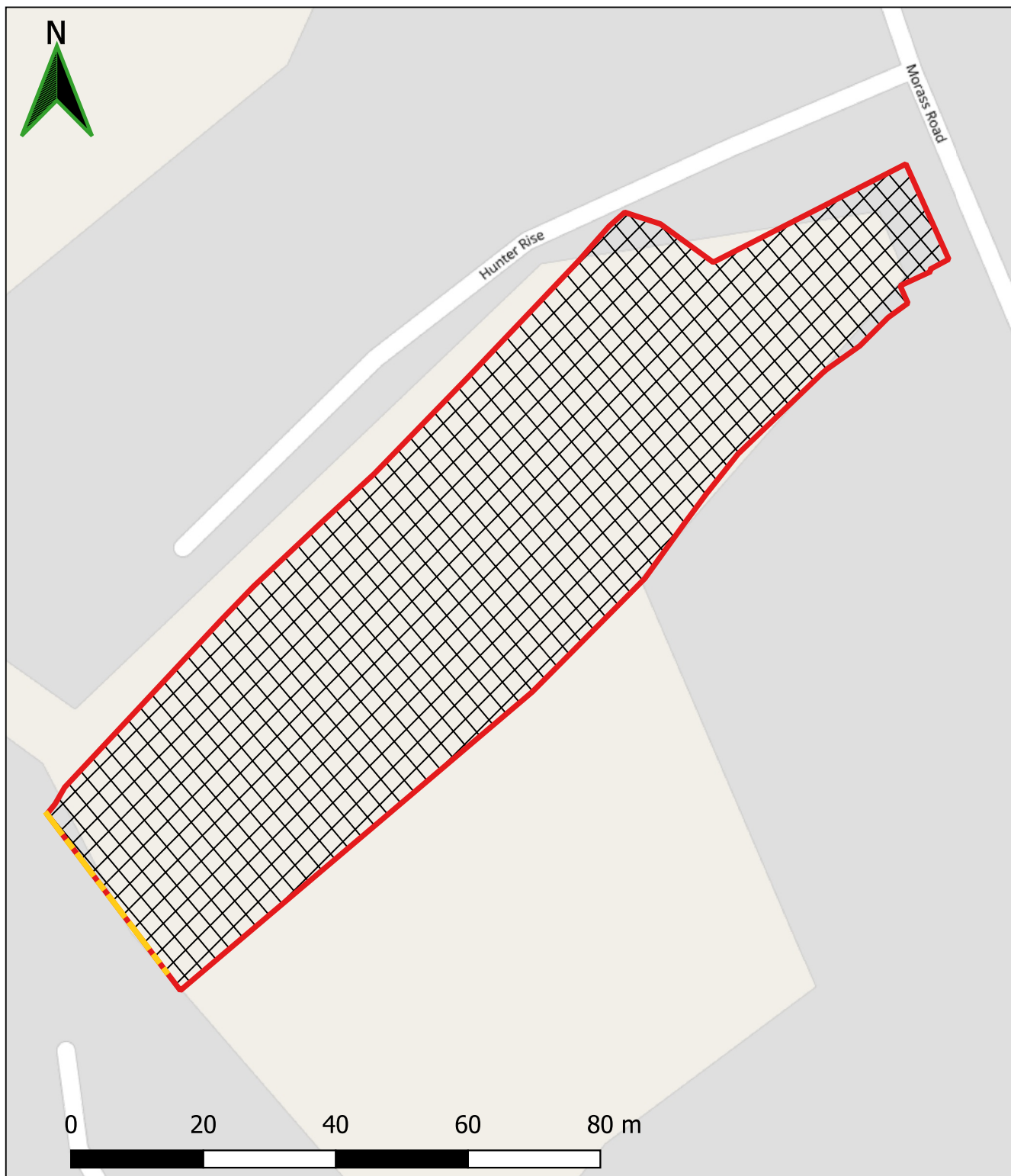
Drawing:
Figure 2: Baseline Habitat Plan

Date: 06-05-2025 Version: FINAL
Author: CM Job No: P2767



Contains OS data © Crown copyright and database right 2025. | All dimensions are approximate.

Copyright © Elton Ecology Ltd. | T: 01332 856371
E: hello@elton-ecology.co.uk | W: www.elton-ecology.co.uk



Legend

 Site Boundary

Baseline Habitat Condition

 Poor

Baseline Hedgerow Condition

 Moderate

Project:

Hunter Rise, Beckermeth, Cumbria

Drawing:

Figure 3: Baseline Habitat Condition Plan

Date: 06-05-2025

Version: FINAL

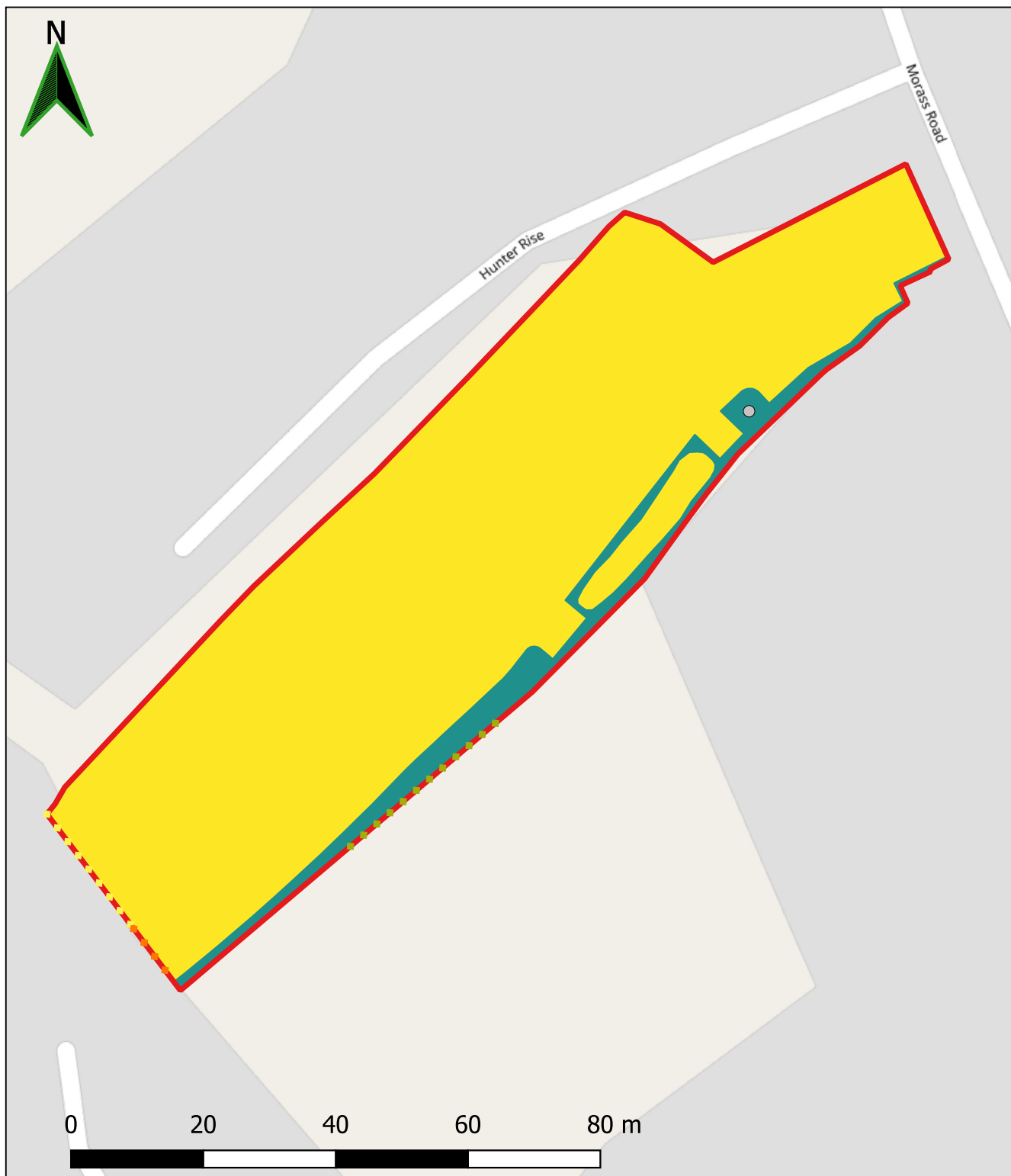
Author: CM

Job No: P2767



Contains OS data © Crown copyright and database right 2025. | All dimensions are approximate.

Copyright © Elton Ecology Ltd. | T: 01332 856371
E: hello@elton-ecology.co.uk | W: www.elton-ecology.co.uk



Legend

 Site Boundary

Habitats Retention

 Retained

 Lost

Hedgerow Retention

 Created

 Retained

 Lost

Individual Tree Retention

 Created

Project:

Hunter Rise, Beckermeth, Cumbria

Drawing:

Figure 4: Baseline Habitat Retention Plan

Date: 06-05-2025

Version: FINAL

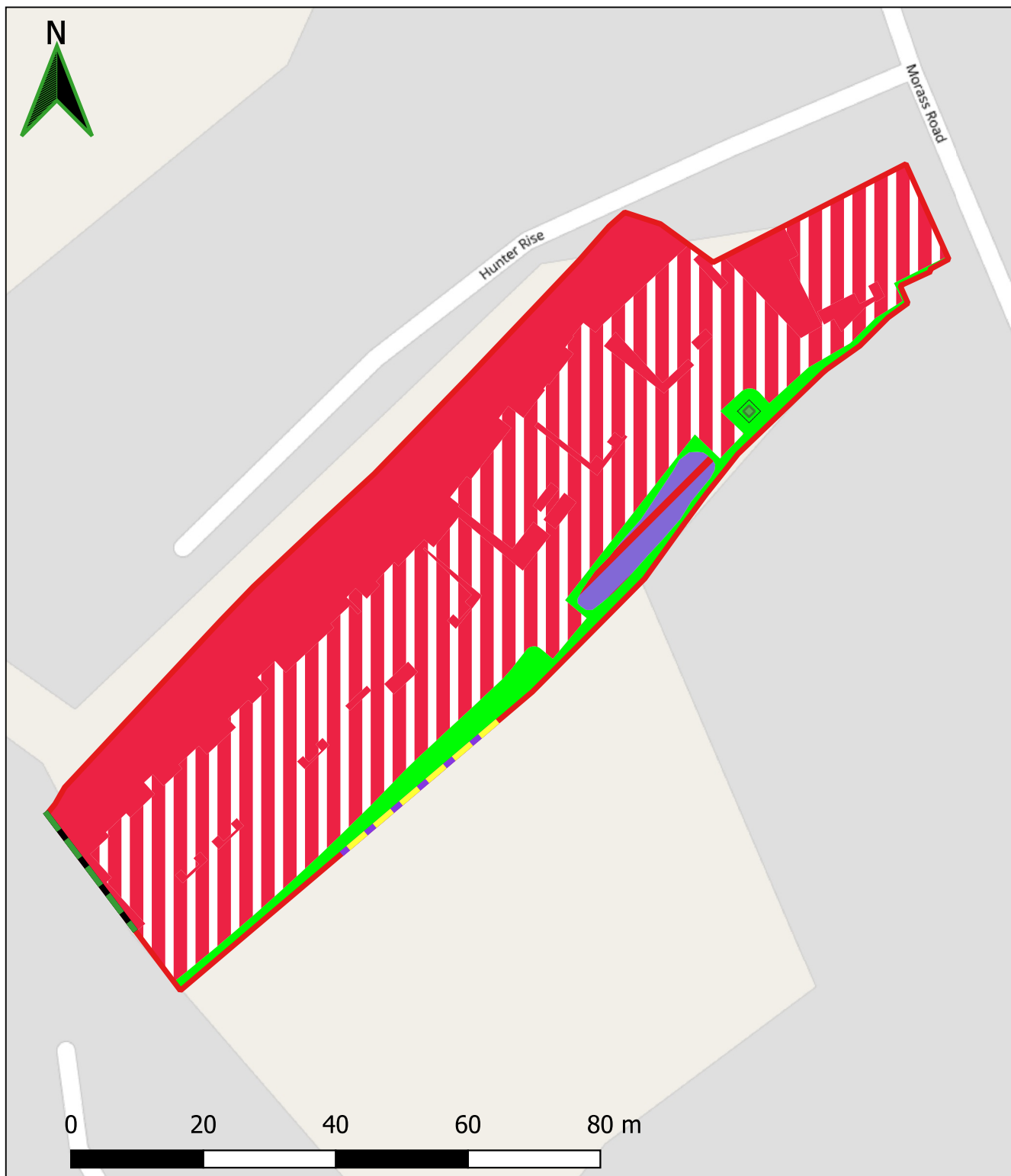
Author: CM

Job No: P2767



Contains OS data © Crown copyright and database right 2025. | All dimensions are approximate.

Copyright © Elton Ecology Ltd. | T: 01332 856371
E: hello@elton-ecology.co.uk | W: www.elton-ecology.co.uk



Legend

-  Site Boundary
-  Developed Land; Sealed Surface
-  Mixed Scrub
-  Modified Grassland
-  Vegetated Garden
-  Line of Trees
-  Native Hedgerow
-  Proposed Small Urban Tree

Project:
Hunter Rise, Beckermeth, Cumbria

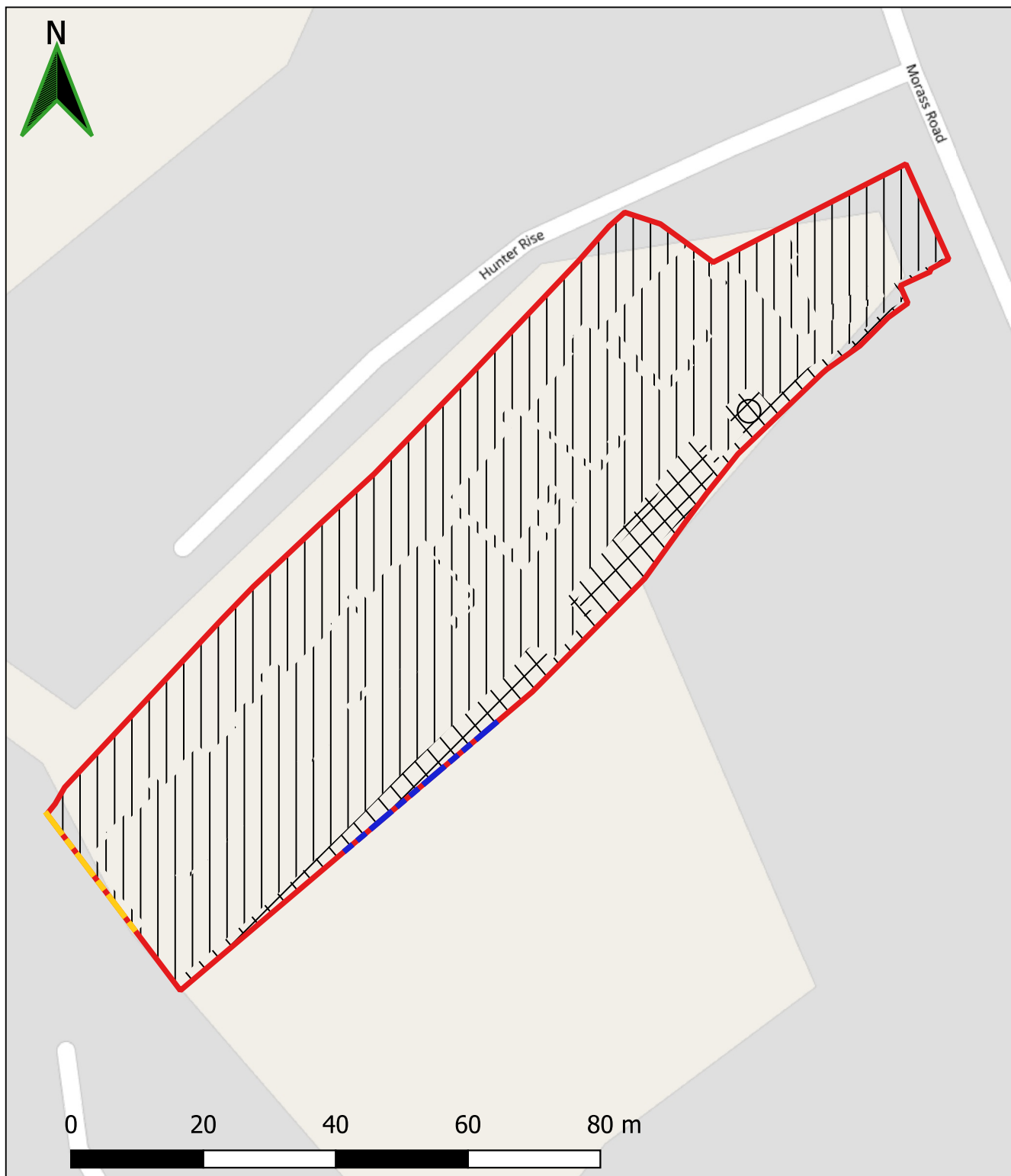
Drawing:
Figure 5: Proposed Habitat Plan

Date: 12-05-2025 Version: FINAL
Author: CM Job No: P2767



Contains OS data © Crown copyright and database right 2025. | All dimensions are approximate.

Copyright © Elton Ecology Ltd. | T: 01332 856371
E: hello@elton-ecology.co.uk | W: www.elton-ecology.co.uk



Legend

 Site Boundary

Proposed Habitats Condition

 Poor

 N/A - Other

 Condition Assessment N/A

Proposed Hedgerow Condition

 Moderate

 Poor

Proposed Individual Tree Condition

 Moderate

Project:

Hunter Rise, Beckermeth, Cumbria

Drawing:

Figure 6: Proposed Habitat Condition Plan

Date: 06-05-2025

Version: FINAL

Author: CM

Job No: P2767



Contains OS data © Crown copyright and database right 2025. | All dimensions are approximate.

Copyright © Elton Ecology Ltd. | T: 01332 856371
E: hello@elton-ecology.co.uk | W: www.elton-ecology.co.uk

Appendix 1: Planning Policy & Legislation Summary

This appendix serves as a summary of relevant policy and legislation. It is not intended to supersede the policy or legislation documents to which it refers, and the relevant full documents should always be consulted prior to decision making.

National Planning Policy Framework 2024

Biodiversity is a material consideration under the National Planning Policy Framework (2023). Relevant text to biodiversity from the NPPF is described below.

In Section 2 of the NPPF 'Achieving sustainable development', paragraph 8(c), the NPPF sets an environmental objective:

"to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

In Section 15 'Conserving and enhancing the natural environment', the NPPF states that:

"187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; [...]*
- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. [...]"*

The NPPF, in paragraph 192 sets out that to protect and enhance biodiversity, plans should:

- *"Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶⁵; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."*

In determining planning applications, the NPPF paragraph 193 sets guidance that local planning authorities should apply the following principles:

- *"if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

- *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest [...];*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while 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.”*

Paragraph 194 states that the following sites should be given the same protection as habitats sites:

- *“potential Special Protection Areas and possible Special Areas of Conservation;*
- *listed or proposed Ramsar sites; and*
- *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”*

Paragraph 195 states that “The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or projects will not adversely affect the integrity of the habitats site.”

Paragraph 198 states that planning policies and decisions should ensure new development is appropriate to its location and take into account likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- *“Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development [...]; [...] and*
- *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”*

The Environment Act 2021

Schedule 14 makes provision for biodiversity gain to be a condition of planning permission in England. The biodiversity net gain relevant percentage is currently set to 10% by the Act.

Appendix 2: Photographs



Photo 1: Modified grassland on site.



Photo 2: Treeline on site.