

Our Ref: 784-B072252

Your Ref: 4/25/2307/0F1

FAO: Chris Harrison

15 October 2025

Dear Chris,

**784-B072252 LAND TO SOUTHWEST OF SUMMERGROVE PARK, WHITEHAVEN -
4/25/2307/0F1**

The project is located at Land to the southwest of Summergrove Park, Hensingham, Whitehaven CA28 8YH. The Proposed Development is a residential development for 70 dwellings including infrastructure landscaping and B&G uplift. The planning application reference is 4/25/2307/0F1.

The applicant has provided the following ecological documents:

- Whistling Beetle Ecological Consultants Limited - Ecological report: Land to Southwest of Summergrove, Whitehaven CA28 8YN, August 2025 (ecological_report_2_0);
- Whistling Beetle Ecological Consultants Limited - Ecological report: Land to Southwest of Summergrove, Whitehaven CA28 8YN, April 2022 (ecological_report_3);
- Whistling Beetle Ecological Consultants Limited – Phase 1 Off site BNG Report Land to Southwest of Summergrove, Whitehaven CA28 8YN, November 2024 (phase_1_off_site_bng_report);
- Whistling Beetle Ecological Consultants Limited – Phase 1 On site BNG Report Land to Southwest of Summergrove, Whitehaven CA28 8YN, October 2024 (phase_1_on_site_bng_report);

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- Whistling Beetle Ecological Consultants Limited – Phase 2 Off site BNG Report Land to Southwest of Summergrove, Whitehaven CA28 8YN, October 2024 (phase_2_off_site_bng_report);
- Whistling Beetle Ecological Consultants Limited – Phase 2 On site BNG Report Land to Southwest of Summergrove, Whitehaven CA28 8YN, October 2024 (phase_2_on_site_bng_report);
- Phase 1 Statutory Biodiversity Metric (Phase 1 - The Statutory Biodiversity Metric Calculation Tool (xlsx));
- Phase 2 Statutory Biodiversity Metric (Phase 2 - The Statutory Biodiversity Metric Calculation Tool (xlsx));
- Phase 1 Statutory Biodiversity Metric Condition Assessments (Phase 1 - Statutory Biodiversity Metric Condition Assessments);
- Phase 2 Statutory Biodiversity Metric Condition Assessments (Phase 2 - Statutory Biodiversity Metric Condition Assessments); and
- Construction Environmental Management Plan (CEMP) (construction_environmental_management_plan_3).

Comments BNG Phase 1 and Phase 2 Onsite and Offsite reports and Metrics.

1. Phase 1 of the development is expected to achieve a 15.90% uplift in Habitat Units using off-site offsetting within the Blue Line Boundary (BLB), adjacent to the site and within ownership of the applicant.
2. Phase 1 of the development is expected to achieve an 126.84% uplift in Hedgerow Units using onsite habitat creation within the Phase 1 Red Line Boundary (RLB).
3. Phase 2 of the development is expected to achieve a 30.09% uplift in Habitat Units using off-site offsetting within the Blue Line Boundary (BLB), adjacent to the site and within ownership of the applicant.
4. Phase 2 of the development is expected to achieve an 341.42% uplift in Hedgerow Units using onsite habitat creation within the Phase 2 Red Line Boundary (RLB).
5. There is no information included within the BNG reports to detail how BNG delivery will be tracked on a phase-to-phase basis and the approach to be taken in the event that

subsequent phases fail to achieve their biodiversity net gain targets. This should be detailed within the HMMP.

Comments Preliminary Ecological Appraisal (PEA)

Designated sites

Designated sites are not considered in either of the PEA reports submitted. The proposed development site lies within 2.2km of the River Ehen Special Area of Conservation (SAC) international/European designated site. The nearest National Statutory designated site is Clints Quarry Special Scientific Interest (SSSI) approximately 2.6km southeast of the site. This proposed development project does not lie within any Local Nature Reserves and there are no Local Nature Reserves within 5 km of this proposed development project. The nearest County Wildlife Site (CWS) is Stanley Pond 1.7km southwest from the site. An assessment for designated sites is required, taking into consideration hydrological links between the site and the River Ehen via the River Keekle and agricultural field drains. Where a hydrological impact pathway is identified a shadow Habitat Regulations Assessment will be required.

Protected and notable species

1. The desk study does not include a data search element from Local Record Centre or any other data source such as the National Biodiversity Network (NBN) Atlas or justification for why this was not included. This does not follow CIEEM's Guidelines for Preliminary Ecological Appraisal (2017) and this information should be obtained and reviewed.
2. Habitat suitability for red squirrel is not considered within the PEA report. Red squirrel are a European Protected Species (EPS) and Cumbria Biodiversity Action Plan (BAP) species. There are known populations of red squirrel in the woodlands around Galemire, immediately north of the site, therefore an assessment for red squirrel is required.
3. The bat assessment methodology references Bat Conservation Trust (BCT), 2007 guidance, which is now superseded by BCT Good Practice Guidelines (Collins, 2023). There are no suitable roosting habitat features on the site, such as trees and the enhancement measures included are welcomed. However the site does offer foraging and commuting habitats for bats and mitigation is required to reduce indirect impacts on foraging and commuting bats.

4. The report stated that habitat suitable for badger was found on site and precautionary working methods are recommended during works. In addition to this we recommend that a pre-commencement badger survey is completed 3 months prior to the start of works.

Habitats

There is no evidence within the PEA reports that the Mitigation hierarchy has been applied (avoid, mitigate, compensate). An impact assessment of the habitats on site is required along with appropriate mitigation and compensation.

Conclusion

BNG

The assessment currently demonstrates a significant net gain in both habitat (**Phase 1 2.08 units, 15.90%, Phase 2: 1.86 units, 30.0%**) and hedgerow (**0.88 units, 126.84% Phase 2: 0.51 units, 341.42%**) units for both Phase 1 and Phase 2 of the development. The report outlines offsite offsetting measures to secure net gain for the site.

It is suggested that this application is approved with the following conditions:

1 – Biodiversity Net Gain Condition

No development hereby permitted shall commence until

- a) A Biodiversity Gain Plan has been submitted to the planning authority demonstrating a 10% net gain for each phase of the development,
- b) The planning authority has approved the plan in writing,
- c) The uplift from modified grassland to other neutral grassland and from modified grassland to mixed scrub is accompanied by a Habitat Management and Monitoring Plan (HMMP) in place for 30 years as the gains here constitute ‘Significant Off-site gains’. The HMMP should include detail how BNG delivery will be tracked on a phase-to-phase basis and the approach to be taken in the event that subsequent phases fail to achieve their biodiversity net gain targets. This HMMP is to be accepted by the council and,
- d) Monitoring results are to be programmed to be submitted to the council. These should include evidence demonstrating how BNG is progressing towards achieving its

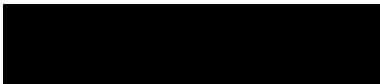
objectives, how this will be tracked across the phases and evidence of arrangements and any rectifying measures needed (including if subsequent phases fail to achieve their biodiversity net gain targets). The development shall be carried out in accordance with the approved plans.

PEA

A full review of this application cannot be progressed until further information/assessments are supplied to support the PEA conclusions:

- Designated sites within 5km of the site should be documented and consideration given to the potential impacts of the development on these sites.
- If the proposals will impact Habitat Sites such as the River Ehen, a Stage 1 shadow Habitat Regulations Assessment will be required.
- A data search should be conducted to support the report or justification given on why this is not required.
- Habitat suitability for red squirrel should be considered within the report.
- Mitigation for foraging and commuting bats is required.
- An impact assessment of the habitats on site is required along with appropriate mitigation and compensation.
- Mitigation and compensation must be detailed in the CEMP.

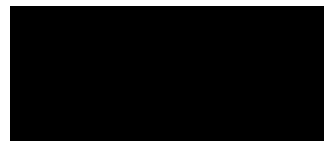
Yours sincerely



Elizebeth Ferrier BSc (Hons) MSc ACIEEM

Senior Consultant

For and on behalf of Tetra Tech Limited



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