

Our Ref: 784-B072252

Your Ref:4/25/2136/DOC

FAO: Christie Burns

06 June 2025

Dear Christie

784-B072252 MILLOM SCHOOL 4/25/2169/0F1

The project is located at Land at Millom School, Salthouse Road, Millom LA18 5AB. The Proposed Development is for redevelopment of areas within the Millom School site. This includes construction of community leisure centre and associated parking and landscaping including demolition of existing buildings and formation of temporary construction compound. Planning application reference is 4/25/2136/DOC.

The applicant has provided the following documents:

- Biodiversity Net Gain (BNG) metric (ERAP Ltd 2023-044b Millom School The Statutory Biodiversity Metric 02.05.25[46] (ADDITIONAL))
- BNG Report (erap_ltd_2023-044b_millom_school_statutory_bng_report_02.05.25_additional).
- Biodiversity Net Gain Plan (biodiversity_gain_plan_april_25)
- Habitat Management and Monitoring Plan (2023044d_millom_school_hmmp_010425).

Comments BNG Report and Metric.

1. A review of the BNG Metric and the BNG Report shows a discrepancy in the proposed on-site net change. The BNG report states that the development will achieve a 11.30% net gain for biodiversity. The BNG metric states that the development will achieve a 15.93% net gain for biodiversity. We suggest that updated versions of one or more of these documents are requested.
2. The report states that Habitat 4 (amenity grassland 1), habitat 5 (amenity grassland 2) and habitat 13 (developed land sealed surface), will be retained post-development, but the retention of habitat 4 is not shown in the metric.

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3. The report states that 45 small trees at moderate condition will be planted, equating to 0.1832ha. This is not presented in the metric which shows that 0.1629ha of trees will be created.
4. The size of the created habitats presented in Table 4.1 do not match the sizes presented in the metric.

Comments BNG Plan.

1. We have reviewed this document and have no comments. The information presented in the BNG Plan matches the information presented in the BNG Metric.

Comments HMMP.

1. We have reviewed this document. The information presented in the HMMP matches the information presented in the BNG Metric. The enhancement measures detailed for Habitat 12 (other neutral grassland) are appropriate. The information provided on habitat creation is adequate.
2. The proposed monitoring scheme is appropriate.

Conclusion

Providing that the above comments are addressed and that BNG report and BNG metric documents can be shown to align on value of the resulting net gain, we suggest that this BNG is approved with any appropriate conditions.

We suggest that the recommendations listed in Section 5.7 should be conditioned, these include the following:

- a. Incorporation of opportunities for roosting bats at the new properties. This is considered to provide additionality.*
- b. Incorporation of opportunities for use by nesting birds at the developed site including in both the public open space by landscape planting and at the new buildings.*
- c. Eradication / control of invasive plant species from the site including Montbretia*
- d. Preparation and implementation of a Landscape and Ecological Management Plan (or similar) to secure long term management of the retained and created habitats in accordance with conservation targets and objectives.*

Yours sincerely

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Senior Consultant

Associate

For and on behalf of Tetra Tech Limited

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