



# Biodiversity gain plan

Submit a biodiversity gain plan to show how your development will achieve biodiversity net gain.

## When to use this form

A biodiversity gain plan shows how a development will achieve 10% biodiversity net gain (BNG). Submit this form to your local planning authority after they approve your planning application.

Unless your development is exempt, you cannot start the development until the LPA approves your biodiversity gain plan and biodiversity metric calculation tool.

## 1. Submission details

### 1.1 Date

For example, 3/11/2023

13/05/2026

### 1.2 Planning application reference number

4/25/2198/0F1

### 1.3 Local planning authority (LPA)

Cumberland Council

### 1.4 Development site address

If the site does not have an address, enter the OS grid reference.

Land At Hodbarrow Nature Reserve, Millom LA18 4JY  
(SD 17718 78724)

### 1.5 Describe the development

Tell us about the proposed development and any changes of use (250 words).

Erection of visitor centre with café/shop, group room, staff/volunteer, toilet facilities and car park; consolidation, repair and installation of interpretive sculpture to Towsey hole windmill; refurbishment of existing tern hide; new bird hides/viewing screens, pathways, gateway features, street furniture and demarcation of spaces at existing car park; enhancement of wildlife habitats; associated landscaping and drainage infrastructure; and maintenance of byway with restricted vehicular access (the Iron Line project)

## 2. Developer details

### 2.1 Applicant name

Wendy Devlin

## 2.2 Company name

Cumberland Council

## 2.3 Address

Parkhouse Building, Baron Way, Carlisle, CA6 4SJ

## 2.4 Email address

[REDACTED]

## 2.5 Telephone number

[REDACTED]

## 2.6 Declaration

By signing this declaration, you confirm that the information you give is complete and correct. Any opinions are your genuine opinions.

## 2.7 Signature

*WLDevlin*

## 2.8 Date

*12th March 2026*

## 3. Responsible person details

Tell us about who is responsible for completing the biodiversity gain plan. For example, a consultancy ecologist or planning agent.

### 3.1 Name

Laura Thomas

### 3.2 Company name

Greengage Environmental Ltd

### 3.3 Address

9 Holyrood Street, London, SE1 2EL

### 3.4 Email address

[REDACTED]

### 3.5 Telephone number

### 3.6 Declaration

By signing this declaration, you confirm that the information you give is complete and correct. Any opinions are your genuine opinions.

### 3.7 Signature

### 3.8 Date

19/02/2026

## 4. Biodiversity net gain strategy

**4.1 Is the relevant date for the pre-development biodiversity value the same date as the planning application?**

- Yes  
 No

**4.2 If no, what earlier date did you agree with the LPA?**

**4.3 How have you met the guidance on ‘what counts towards your BNG’?**

[Find out what you can count towards a development's BNG](#)

Yes

**4.4 How will you avoid or minimise impacts to habitats?**

Tell us about the steps you've taken on site, including to avoid or minimise the impact on irreplaceable habitats.

The designs have targeted lower distinctiveness habitats such as scrub and avoided the higher distinctiveness lowland meadow in its entirety and the majority of the lowland calcareous grassland

**4.5 Did you use your local nature recovery strategy to inform the strategic significance of habitats?**

This includes other specified strategies if you do not have a local nature recovery strategy.

- Yes  
 No

**4.6 How will you achieve the target net gain percentage?**

- On-site  
 Off-site  
 Both

**4.7 Are any of your on-site enhancements considered ‘significant’?**

[Find out what counts as a significant on-site enhancement.](#)

Yes

No

#### 4.8 If yes, tell us about the significant on-site enhancements

Include the appropriate planning condition or how you've secured the habitat.

We are seeking to enhance the lowland calcareous grassland and mixed scrub on site.

#### 4.9 How many off-site biodiversity units do you need to meet 10% net gain?

0.72 HU

#### 4.10 Explain why you're using off-site biodiversity units

Only answer this question if you're planning to use off-site biodiversity units (250 words).

There are areas of land where management will be difficult due to steep gradients and safety considerations. Additionally, the site falls partially within Hodbarrow Nature Reserve, which is owned by RSPB. RSPB have confirmed that their land cannot be used to achieve 10% BNG as Hodbarrow Nature Reserve is within a Site of Special Scientific Interest (SSSI) and should already been managed in favourable condition. As such, the purchase of off-site Habitat Units (HU) is required.

#### 4.11 Explain why you're planning to use statutory biodiversity credits

Only answer this question if you're planning to use statutory biodiversity credits (250 words).

n/a

#### 4.12 Do you have a habitat management and monitoring plan?

Yes

No

#### 4.13 Have you used the statutory biodiversity metric tool?

Yes

No

#### 4.14 Biodiversity metric calculation

Send your biodiversity metric calculation to the LPA and enter the file name.

553023lt01Jul25\_V.23.07.2024

#### 4.15 Condition assessments

Send your condition assessments to the LPA and enter the file name.

553023lt03Jul25FV04\_BNGA\_Redacted

#### 4.16 Pre-development habitat survey report and map

Send your baseline habitat survey report and map to the LPA. Enter the file name.

553023lt03Jul25FV04\_BNGA\_Redacted

#### 4.17 Post-development habitat map or landscape plan

Send your post-development habitat survey report and map to the LPA. Enter the file name.

553023lt03Jul25FV04\_BNGA\_Redacted

#### 4.18 Have you included an approved habitat degradation in the baseline?

If yes, include the relevant consenting body and reference number.

Yes

No

Consenting body

Reference number

### 5. Irreplaceable habitats

#### 5.1 Does the development impact any irreplaceable habitats?

If yes, tell us if you've submitted an approved compensation plan.

Yes

No

#### 5.2 Have you submitted an approved compensation plan?

Yes

No

### 6. On-site habitat enhancements

Answer this section if your development includes on-site habitat enhancements.

#### 6.1 Survey date

For example, 3/11/2023

25/03/2025, 26/03/2025,  
03/05/2025 ,04/05/2025

#### 6.2 Survey constraints

For example, access issues, weather, or seasonal constraints.

Botanical surveys were conducted within the optimal period for the surveyed habitat types. However, while surveys were conducted within the broadly optimal period, it is likely that some plant species may have been missed due to later phenologies. Nonetheless, the survey was led by a highly experienced, FISC 6 botanical specialist who is satisfied with the survey effort as it relates to specified survey objectives.

Many cryptic taxa, namely including apomictic species under the genera Hieracium, Rubus and Taraxacum, could not always be identified to species-level due to seasonal constraints. Plants across these genera are only able to be identified in the presence of all relevant vegetative parts, flowers and/or fruits. Furthermore, most species within these genera may only reliably be identified by country experts, of which there are 3 for Hieracium, 6 for Rubus and 1 for Taraxacum. It is unrealistic to identify all cryptic taxa on any site which were recorded to aggregate level where appropriate. This limitation has therefore been addressed as far as is reasonably practicable and is not considered by the author to be a significant constraint for the purposes of this survey and assessment.

The surveyor is not a specialist bryologist and some taxa, particularly those which require microscopic identification, are likely to have been omitted from survey data. However, a reasonable effort was made to identify non-vascular plants wherever possible. This report does not constitute a specialist bryological assessment or an assessment for other visually similar groups, including lichenised or other macro fungi.

QGIS mapping of habitats was done with use of aerial and other imagery. Although every reasonable effort has been made to be as accurate as possible with regards to habitat boundaries, there is an inevitable margin of error associated with habitat mapping.

### 6.3 Total pre-development biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

Number of hedgerow biodiversity units

Number of watercourse biodiversity units

### 6.4 Total post-development biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

Number of hedgerow biodiversity units

Number of watercourse biodiversity units

### 6.5 Total net change in biodiversity units

Enter the number from the headline results in your statutory biodiversity metric calculation.

Area habitat biodiversity units

Area habitat biodiversity units % change

Hedgerow biodiversity units

Hedgerow biodiversity units % change

Watercourse biodiversity units

0

Watercourse biodiversity units % change

0

### 6.6 Will you register and allocate any biodiversity units from your site to other developments?

If yes or provisionally, give details.

- Yes  
 No

### 6.7 Give details

Tell us about the amount of biodiversity units and the development location (250 words).

The development will deliver a total of 23.94 Habitat Units.

At the time of submission, no Local Nature Recovery Strategy (LNRS) was available.

A proportion of the habitats are located within Hodbarrow Nature Reserve, which is nationally designated as a SSSI. The reserve also falls within the internationally designated sites Duddon Estuary Special Protection Area (SPA) and Ramsar site and Morecambe Bay and Duddon Estuary Special Area of Conservation (SAC). Due to these national and international designations, these habitats were awarded High Strategic Significance.

The remaining habitats are located outside the boundaries of these national and international designations and were therefore assigned Medium Strategic Significance.

## 7. Off-site habitat enhancements

Answer this section if your development includes off-site habitat enhancements.

### 7.1 Tell us about the off-site habitat enhancements

Include whether you're delivering the off-site enhancements or buying biodiversity units.

Purchasing off-site biodiversity units from EBL HB Ltd

### 7.2 Biodiversity gain site register reference number

BGS-101024001

### 7.3 How have you secured the off-site habitat enhancements?

Tell us about any responsible bodies and whether you've used an S106 or conservation covenant.

A conservation covenant via RSK Biocensus Ltd.

### 7.4 Total baseline biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

0.93

Number of hedgerow biodiversity units

0.00

Number of watercourse biodiversity units

0.00

### **7.5 Total biodiversity value post-intervention**

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

1.91

Number of hedgerow biodiversity units

0

Number of watercourse biodiversity units

0

### **7.6 Total net change in biodiversity units**

Enter the number from the headline results in your statutory biodiversity metric calculation.

Area habitat biodiversity units

2.26

Area habitat biodiversity units % change

10.07%

Hedgerow biodiversity units

0

Hedgerow biodiversity units % change

0

Watercourse biodiversity units

0

Watercourse biodiversity units % change

0

## 8. Statutory biodiversity credits

Answer this section if you need to use statutory biodiversity credits.

### 8.1 Do you need to use statutory biodiversity credits?

Yes

No

### 8.2 How many statutory biodiversity credits do you need?

Tell us the unit shortfall by tier, including the spatial risk multiplier. Enter the number from the headline results in your statutory biodiversity metric calculation.

A1

A2

A3

A4

A5

H

W

### 8.3 What evidence is there that no units are available through the market?

Send a message from at least 3 habitat providers, or a search result from online registers.

### 8.4 Proof of purchase

Send proof of purchase and enter the reference number.

## 9. Trading summary

### 9.1 Distinctiveness group

Tell us if you met the BNG trading rules on habitat compensation for each distinctiveness group. If you did not meet the trading rules, tell us if you agreed bespoke habitat compensation.

Check the rules on habitat compensation in the [statutory biodiversity metric user guide](#).

Very high

Yes
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High

Yes
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Medium

Yes
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Low

Yes
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## 10. Sharing data (optional)

### 10.1 Can we share your ecological survey data with the Local Environmental Records Centre or other bodies?

Yes

No