



Biodiversity Metrics

Egremont

January 2024

Quality Control

Report Status: Final

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Biodiversity Metrics
Proposed Aldi, Egremont

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1.0 EXECUTIVE SUMMARY

Total Ecology was commissioned by Avison Young in December 2023 to undertake a Biodiversity Net Gain (BNG) assessment of a former garage site in Egremont. The approximate National Grid Reference for the centre of the site is **NY 01176 11081**.

A BNG assessment is required prior to proposals to create a new Aldi food store with associated soft landscaping.

The Biodiversity Metric calculation shows a baseline of 0.06 habitat units with no hedgerow or river units.

After proposals have been completed to the most up to date landscape plan, the site will provide 0.55 habitat units, 0.24 hedgerow units, and no river units, resulting in a biodiversity net gain of 970.59%.

The trading summary is also satisfied by proposals as habitats due to be created are of much higher value than those existing.

2.0 INTRODUCTION

2.1 Background

Total Ecology was commissioned by Avison Young in December 2023 to undertake a Biodiversity Net Gain (BNG) assessment of a former garage site in Egremont. The approximate National Grid Reference for the centre of the site is **NY 01176 11081**.

A BNG assessment is required prior to proposals to create a new Aldi food store with associated soft landscaping.

A Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) were carried out by Total Ecology in November 2023 and the report for these surveys should be read in conjunction with this report (Total Ecology, 2023).

The project is currently in the final stage and the metrics within this report are likely to be final

2.2 Site Description

The site is located within the east of the Cumbrian town of Egremont; the west is therefore predominantly residential with some open amenity grassland as part of West Lakes Academy. The site is directly bounded by the busy A595 road, and small areas of linear woodland. More substantial green space is present further east where the River Ehen flows surrounded by woodland. Outside of the town the area is dominated by pasture. The west coast of England is approximately 4.5km west of site.

2.3 Objectives

The objective of this report is to show the site baseline biodiversity, in habitat units, and demonstrate the gain/ loss in biodiversity brought about by site proposals.

3.0 PLANNING POLICY AND LEGISLATION

The following planning policies and legislation are relevant to BNG and this report. Other legislation is in place to protect various habitats and species within the UK (detailed in the PEA & PRA Report):

- Town and Country Planning Act 1990;
- The Hedgerows Regulations 1997;
- Environment Act 2021; and
- The Biodiversity Gain Site Register Regulations 2024

3.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Section 11 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity. Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on:

- Landscape;
- Biodiversity, ecosystems and green infrastructure; and
- Brownfield land, soils and agricultural land.

3.2 UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (UK BAP) was succeeded in 2012 by the 'UK Post-2010 Biodiversity Framework' which demonstrates a whole-environment strategy on how the UK contributes to achieving the Convention on Biological Diversity's (CBD) 20 Aichi Biodiversity Targets. In England, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' (Defra, 2011) sets out the strategic direction for biodiversity policy in the future.

The former UK BAP was used to draw up lists of species and habitats of 'principal importance' which continue to be regarded as priorities under the Post-2010 Biodiversity Framework and are identified under Section 41 of the NERC Act 2006; these species have been considered throughout this report.

3.3 Local Planning Policy & Biodiversity Action Plan

The Cumbria Biodiversity Action Plan identifies protected species within the borough which are in need of priority conservation action. The list was updated in 2009 to include all UK BAP species present in Cumbria.

Copeland Borough Council have produced the Copeland Local Plan 2021 – 2038 which details the goals for the borough. This plan includes the Natural Environment and Biodiversity Net Gain, as well as Green

Infrastructure. Strategic Policy N3PU covers Biodiversity Net Gain. Cumbria also have a pilot Local Nature Recovery Strategy document in place (Cumbria County Council, 2021).

Strategic Policy N3PU: Biodiversity Net Gain

The policy states that all developments (with the exception of those listed in the Environment Act 2021) must provide a minimum 10% biodiversity net gain above existing site levels, following the below approach:

1. On site provision;
2. Off site provision (in a Local Nature Recovery Network);
3. Off site provision or;
4. The purchase of biodiversity units/ credits where investment will be directed to nationally strategic habitats where there are no local habitat creation projects available.

The policy states that sites where net gain is provided must be managed and monitored by the applicant for a minimum of 30-years with annual monitoring reports submitted to the council each year.

Local Nature Recovery Strategy

The LNRS details priority habitats and opportunities for nature recovery beyond these to create a “bigger, better, joined” network. The plan details the habitat baseline of Cumbria and identified specific areas where action for nature should be taken.

3.4 Biodiversity Net Gain

As part of Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) biodiversity net gain is becoming mandatory in England. This means developers must deliver a minimum biodiversity net gain of 10% measurable biodiversity net gain resulting in more or better-quality natural habitat than was prior to development.

4.0 PROJECT BACKGROUND



4.1 Summary of Ecological Baseline




A site visit was undertaken on the 15th November 2023 by Laura Thompson BSc ACIEEM, Senior Ecologist, in accordance with the UK Habitat Classification methodology (Butcher et al., 2020) using the most up to date version on the UK Habitat Classification (Version 2.0). Habitats have been converted to BNG habitats in Table 1 below as detailed within the Statutory Biodiversity Metric Draft User Guide. Habitats have been assessed as per the Statutory Biodiversity Metric Condition Assessments (DEFRA, 2023).


Full survey details are within the PEA & PRA Report which should be read in conjunction with this one.

Five BNG habitats were recorded during the site visit. Ruderal/ ephemeral and introduced shrub habitats have not been included in mapping or the net gain calculation as the areas recorded are less than the minimum mapping units of 25m². Descriptions of habitats are below, with condition assessments in section 3.4.

Table 1 Habitat descriptions

Habitat Type		Description	Photograph(s)
UKHab	BNG		
h3d -Bramble scrub	Bramble scrub	The very south of site is dominated by a strip of bramble <i>Rubus fruticosus</i> dominated scrub with a single alder <i>Alnus glutinosa</i> present and featuring undesirable species such as broadleaved dock <i>Rumex obtusifolius</i> , cleavers <i>Galium aparine</i> , rosebay willowherb <i>Chamerion angustifolium</i> , and hedge bindweed <i>Calystegia sepium</i> .	
u1b – Developed land; sealed surface	Developed land; sealed surface	The northern section of site is a road and car park with a small area of path along the south of building reference A (the most southern building).	
u1b5 - Buildings	Developed land; sealed surface	There are three buildings on site. All buildings are connected. These are a garage showroom, a workshop and a fuel station canopy. These are not distinguished from other developed land within BNG habitat map and provide negligible ecological value and no habitat units as developed	

		land described above.	
u1c – Artificial unvegetated, unsealed surface	Artificial unvegetated, unsealed surface	The south section of site, as well as some strips to the west and east are made up of a loose gravel which has allowed the presence of ephemeral vegetation to grow through.	
Secondary code 81 – Ruderal/ephemeral	Ruderal/ephemeral	<p><i>Buddleia Buddleja davidii</i> is present in areas of site and the loose gravel of artificial unvegetated, unsealed surface has allowed a variety of ephemeral vegetation to emerge.</p> <p>Species recorded include buddleia, dandelion <i>Taraxacum officinale</i>, spear thistle <i>Cirsium vulgare</i>, common nettle <i>Urtica dioica</i>, white clover <i>Trifolium repens</i>, sow thistle <i>Sonchus sp.</i>, vetch <i>Vicia sp.</i>, meadow vetchling <i>Laythrus pratensis</i>, geranium <i>Geranium sp.</i>, common figwort <i>Scrophularia nodosa</i>, greater plantain <i>Plantago lanceolata</i>, and black medick <i>Medicago lupulina</i>.</p> <p>*These areas are smaller than the minimum mapping units of BNG and have therefore not been included in the metrics map or calculation.</p>	

Secondary code 847 – Introduced shrub	Introduced shrub	<p>There is a patch of introduced shrubs within a corner next to the southernmost building. These are identified as skimmia <i>Skimmia sp.</i> and cotoneaster <i>Cotoneaster sp.</i></p> <p>*These areas are smaller than the minimum mapping units of BNG and have therefore not been included in the metrics map or calculation.</p>		
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4.2 Mitigation Hierarchy

This Biodiversity Metrics has been carried out with the mitigation hierarchy of avoidance, minimisation, restoration, and compensation in mind. Therefore, habitats have been retained or enhanced where possible before removal and replacement. The site to be developed effects as small amount of land as possible.

5.0 METHODOLOGY

5.1 Introduction

The aim of the biodiversity net gain is to ensure that developments include an increase in habitat biodiversity in comparison to the habitats on site before development. Documentation is available for classifying habitats so that there is consistency, and the approach is unified across the sector. The biometric calculator tool produced by DEFRA (2023) allows information to be processed so that biodiversity is quantified before and after development, allowing a % change in biodiversity to be produced. The tool is also useful for providing advice when estimating areas of habitat required for management or habitat creation when off-site compensation is needed.

5.2 Personnel

This Biodiversity Metrics calculation and report have been prepared by Laura Thompson BSc ACIEEM, Senior Ecologist. Laura has been working on BNG projects since early in the process and is experienced in using the Biodiversity Metrics from version 2.0 onwards, keeping up to date with changes as they develop. She has experience of completing a variety of large and small net gain projects and has attended training in using the metrics to solidify her skills.

5.3 Methodology

BNG works have been carried out in line with the Biodiversity Net Gain Good practice principles for development (CIEEM, CIRIA, IEMA, 2016 & 2019) and BS8683.

The scheme was input into the Statutory Biodiversity Metric (Defra 2023) using the following methodology:

- Distinctiveness is filled in automatically by the metrics.
- Existing habitats and their condition assessments were recorded during the survey carried out on 15th November 2023. The Statutory Biodiversity Metric Condition Assessments were used to carry out condition assessments.
- Proposed habitats were taken from the most up to date document “Landscape Plan NSH 015 P101” provided by Nicola Hills Studio in January 2024.
- The Biodiversity Metric QGIS template is used to map both existing and proposed habitats with the programme also used to gain area measurements.
- Individual tree habitat size is estimated using the urban tree helper tool within the Metric. Trees with a diameter of 300mm or less are classed as small and those between 300 – 900mm are medium; trees over 900mm are large. Newly planted trees are entered into the metrics as small, unlikely to reach a larger size within the 30-year lifespan of the metrics.
- The Cumbria Local Nature Recovery Strategy was consulted to assess the sites strategic significance. The site is not identified of importance to habitats within the strategy and has been included in the metrics as “area not in the local strategy”.
- All habitats were recorded as “On site”.

5.4 Limitations and Constraints

Proposed habitats within the Biodiversity Metrics have been made in a conservative manner, aiming to be achievable. Should any habitats created within site not meet the conditions within the Biodiversity Metrics, then the net gain figure will differ from that quoted in this report.

6.0 BASELINE CONDITIONS

6.1 Habitat Condition Assessments

- 6.1.1 All habitats listed on site are not subject to condition assessments, being recorded as either “N/A – Other” or “Condition Assessment N/A”.

7.0 BNG GOOD PRACTICE PRINCIPLES

7.1 Good Practice Principles for Development

Taken from the document prepared by CIEEM, CIRIA, & IEMA, the following are the BNG good practice principles for development:

1. Apply the mitigation hierarchy;
2. Avoid losing biodiversity that cannot be offset by gains elsewhere;
3. Be inclusive and equitable;
4. Address risks;
5. Make a measurable net gain contribution;
6. Achieve the best outcome for biodiversity;
7. Be additional;
8. Create a Net Gain legacy;
9. Optimise sustainability;
10. Be transparent.

Appendix B details how this project has applied these principles to the BNG.

8.0 PROPOSED DESIGN

The site will be cleared before new habitats are created with no enhancements proposed for site. Proposed habitats have been made in a conservative manner, aiming to be achievable and realistic.

8.1 Habitat Condition Assessments

8.1.1 Other Neutral Grassland

Grassland is proposed around the boundaries of site. It is recommended that an appropriate species mix is used to allow the presence of a high number of native species. Grassland condition assessment, below, has been made in a conservative manner where it may not be possible to have 10 species in a square metre.

Table 2 Condition Sheet: Grassland Habitat Type (medium, high, and very high distinctiveness) (DEFRA, 2023)

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	The grassland is a good representation of the habitat type it has been identified as, based on its UKHab description - the appearance and composition of the vegetation closely matches the characteristics of the specific grassland habitat type. Indicator species listed by UKHab for the specific grassland habitat type are consistently present. Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Y	Likely to be achieved with the Emorsgate EM1 mix.
B	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.	Y	With use of an appropriate mix and management.
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Y	
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Y	Not included in planting schedule.
E	Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.	Y	Not included in planting schedule.
Additional Criterion - must be assessed for all non-acid grassland types			
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	N	
Essential criterion for Good condition achieved (for non-acid grassland) (Yes or No)		Y	
Number of criteria passed		5	
Condition Assessment Result	Condition Assessment Score	Score Achieved x/✓	
Non-acid grassland Types (Result out of 6 criteria)			
Passes 5 or 6 criteria, including essential criterion A and additional criterion F.	Good (3)		
Passes 3 - 5 criteria, including essential criterion A.	Moderate (2)	✓	

Passes 2 or fewer criteria; OR Passes 3 or 4 criteria excluding criterion A and F.	Poor (1)		
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8.1.2 Mixed Scrub

Mixed scrub is due to be planted around the southern boundary of site. Planting is due to be of native scrub species:

- Dogwood *Cornus sanguinea*
- Hazel *Corylus avellana*
- Hawthorn *Crataegus monogyna*
- Blackthorn *Prunus spinosa*
- Dog rose *Rosa canina*
- Guelder rose *Viburnum opulus*

Given the relatively small area of planting, it is unlikely that scrub will develop a good, varied structure. The proposed area of planting is bounded by hardstanding and will therefore not feature a well-developed edge. Scrub on site will therefore likely achieve only poor condition.

Table 3 Condition Sheet: Scrub Habitat Type (DEFRA, 2023)

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). - At least 80% of scrub is native, - There are at least three native woody species, - No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	Y	At least 3 species to be planted.
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	N	Not likely given nature of planting.
C	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA) and species indicative of suboptimal condition make up less than 5% of ground cover.	Y	No INNS to be included in planting schedule.
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	N	Unlikely to have well-developed edge.
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	N	Habitat area too small for these features.
Number of criteria passed			2
Condition Assessment Result (out of 5 criteria)		Condition Assessment Score	Score Achieved x/√
Passes 5 criteria		Good (3)	
Passes 3 or 4 criteria		Moderate (2)	
Passes 2 or fewer criteria		Poor (1)	✓

8.1.3 Individual trees

Four individual trees are due to be planted on site, three field maple *Acer campestre* 'Streetwise', and one silver birch *Betula pendula*. The maples have been included as introduced shrub given their small size and the fact that they will likely blend in with scrub habitat. The silver birch is included as an

individual tree, condition assessed as below. The tree is a native species planted atop introduced plants however, given that the tree will be newly planted, it will only be of small size, and will not have veteran features during the lifespan of the metric (30 years).

Table 4 Condition Sheet: Individual Trees Habitat Type (DEFRA, 2023)

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	The tree is a native species (or at least 70% within the block are native species).	Y	Native silver birch.
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	Individual tree
C	The tree is mature (or more than 50% within the block are mature).	N	Unlikely that tree will reach maturity over lifespan of the metric.
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Y	Tree should be allowed to grow with no regular pruning regime.
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy, or loose bark.	N	Due to tree being newly planted it is unlikely that veteran features will form over the lifespan of the metric.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Tree due to be planted within vegetation.
Number of criteria passed		4	
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved ×/✓	
Passes 5 or 6 criteria	Good (3)		
Passes 3 or 4 criteria	Moderate (2)	✓	
Passes 2 or fewer criteria	Poor (1)		

8.1.4 Line of trees

A line of 3 non-native callery pear *Pyrus calleryana* 'Chanticleer' is due to be planted within the west of site. The trees will be atop vegetation. It is unlikely that these trees will reach maturity during the 30-year lifespan of the metric, and it is therefore also unlikely that veteran features will form.

Table 5 Condition Sheet: Line of Trees Habitat Type (DEFRA, 2023)

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	At least 70% of trees are native species.	N	Trees are all non-native species.
B	Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.	Y	Canopy will be continuous.
C	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.	N	Unlikely to form veteran features over the lifespan of the metric.
D	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 human activities (excluding grazing). Where veteran trees are present, root protection areas should follow standing advice.	Y	To be planted within vegetation.
E	At least 95% of the trees are in a healthy condition (deadwood or veteran features valuable for wildlife are excluded from this). 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	Trees should be in healthy condition. A monitoring plan should be put in place to ensure trees remain in good health.
Number of criteria passed			3
Condition Assessment Result (out of 5 criteria)		Condition Assessment Score	Score Achieved x/√
Passes 5 criteria		Good (3)	
Passes 3 or 4 criteria		Moderate (2)	√
Passes 2 or fewer criteria		Poor (1)	

8.1.5 Other

Introduced shrub is due to planted within the north-west area of site. This planting includes small non-native and native small tree species that will likely blend into the scrub habitat and have therefore been included within scrub for the purpose of this metric calculation. This introduced shrub habitat is not subject to a condition assessment, recorded within the metric as “Condition assessment – N/A”. The area due to be planted with ornamental ivy *Hedera helix* ‘Glacier’ and periwinkle *Vinca minor* has also been recorded as introduced shrub; despite not being strictly shrub species, this ornamental planting fits best into this BNG category.

All other areas on site will be developed land; sealed surface which provides negligible ecological opportunities and no habitat units, with a condition assessment of “N/A – Other”.

9.0 BNG METRIC RESULTS

The National Planning Policy Framework (NPPF) outlines government planning policies and how they should be applied within local authorities. The framework places an emphasis on sustainable development, encouraging the re-use of land that has previously been developed in preference to using land that has a higher environmental value and by minimising impacts on biodiversity. The NPPF states that developments should aim to conserve or enhance biodiversity and encourages opportunities to incorporate biodiversity in and around developments.

Taking the requirements of the NPPF into account, opportunities should be sought where possible for nature conservation enhancement at this site with an overall 10% net gain recommended. A precautionary approach has been taken when completing the metrics, making sure that proposals are all realistic.

The Biodiversity Metric calculation shows a baseline of 0.06 habitat units with no hedgerow or river units.

After proposals have been completed to the most up to date landscape plan, the site will provide 0.55 habitat units, 0.24 hedgerow units, and no river units, resulting in a biodiversity net gain of 970.59%. Although there is an increase in hedgerow, it is not possible to calculate a percentage net gain due to the hedgerow baseline being 0.

The trading summary is also satisfied by proposals as habitats due to be created are of much higher value than those existing.

It is recommended that the habitats created on site aim for the condition as described within this report, however, even if the conditions fall short the project will still achieve a net gain in biodiversity with a much larger area of green habitats on site than are currently present.

10.0 REFERENCES

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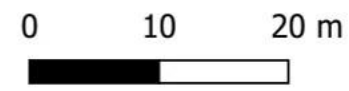
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APPENDIX A

Figures



Legend

Red Line Boundary

HABITATS

Habitats Baseline

Artificial unvegetated, unsealed surface

Bramble scrub

Developed land; sealed surface

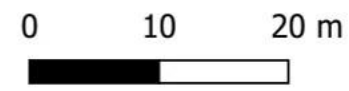
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Project	Aldi, Egremont
Title	Baseline Habitats Map
Client	Avison Young & Aldi
Date	31/01/2024
Ref	Figure 1



Legend

- Red Line Boundary
- INDIVIDUAL TREES**
- Individual tree Proposed
- ◆ Proposed Small Urban Tree
- HEDGEROWS**
- Hedgerows Proposed
- Line of trees
- HABITATS**
- Habitats Proposed
- Developed land; sealed surface
- Introduced shrub
- Mixed scrub
- Other neutral grassland

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Project	Aldi, Egremont
Title	Proposed Habitats Map
Client	Avison Young & Aldi
Date	31/01/2024
Ref	Figure 2

APPENDIX B

Application of good practice principles

BNG Principle	Indicators
Principle 1. Apply the Mitigation Hierarchy	It is necessary to clear site to be able to create new habitats and the new store and therefore avoidance is not possible on this site. However, only bramble scrub provides any habitats unit and therefore the site will be much improved via the creation of the store and landscaping with only minimum loss of bramble scrub, a habitat with limited potential.
Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere	There are no irreplaceable habitats on site and only bramble scrub provides any habitat units which is a relatively poor habitat, that is commonly occurring.
Principle 3. Be inclusive and equitable	This report will be provided as part of the store planning application, to the local planning authority.
Principle 4. Address risks	<p>This report and the metric calculation clearly demonstrate a gain in biodiversity on site. There is a risk that habitats will not achieve or remain in the condition recorded within the metric, which would result in a lower gain. However, on this site, the habitat baseline is so low that even lower quality habitats will still lead a net gain in biodiversity.</p> <p>A management and monitoring plan may be needed to ensure gains stay in place for the 30-year lifespan of the metric.</p>
Principle 5. Make a measurable Net Gain	The most up to date metric has been used (The Statutory Biodiversity Metric Calculation Tool) and this shows a large gain.
Principle 6. Achieve the best outcomes for biodiversity	The site is not identified as an area for improvement in the Local Nature Recovery Strategy, being in a relatively urban area. However, the addition of grassland and scrub on site will improve the biodiversity of the area, with scrub providing some connectivity along the south of site. The BNG is in line with local policy N3PU as the gain is over 10% and is achieved on-site, which is the first priority within the policy.
Principle 7. Be additional	The site is currently almost entirely urban with a large area of sealed surface that will not allow vegetation growth. Although some succession may take place should the site be left, this would be restricted in area and unmanaged. The proposals to create neutral grassland and managed mixed scrub will provide better-quality habitats on areas which would otherwise largely remain as hardstanding.
Principle 8. Create a Net Gain legacy	The client is responsible for ensuring net gain for the 30-year lifespan. It is up to them to place someone with appropriate experience in charge of this.
Principle 9. Optimise sustainability	The project provides improvement to the Egremont economy by the creation of a new budget foodstore. Landscaping as part of the foodstore creation allows the project to also provide an improvement to the biodiversity of the area.

Principle 10. Be transparent	This report will be submitted as part of the planning process and will therefore be available on the local planning authority planning portal.
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APPENDIX C
Report Conditions

TOTAL ECOLOGY

REPORT CONDITIONS Egremont

This report is produced solely for the benefit of Avison Young and Aldi and no liability is accepted for any reliance placed on it by any other party unless specifically agreed in writing otherwise.

This report is prepared for the proposed uses stated in the report and should not be used in a different context without reference to Total Ecology. In time improved practices, fresh information or amended legislation may necessitate a re-assessment. Opinions and information provided in this report are on the basis of Total Ecology using due skill and care in the preparation of the report.

This report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times.

This report is limited to those aspects reported on, within the scope and limits agreed with the client under our appointment. It is necessarily restricted and no liability is accepted for any other aspect. It is based on the information sources indicated in the report. Some of the opinions are based on unconfirmed data and information and are presented as the best obtained within the scope for this report.

Reliance has been placed on the documents and information supplied to Total Ecology by others but no independent verification of these has been made and no warranty is given on them. No liability is accepted or warranty given in relation to the performance, reliability, standing etc of any products, services, organisations or companies referred to in this report.

Whilst skill and care have been used, no investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather related conditions.

Although care is taken to select monitoring and survey periods that are typical of the environmental conditions being measured, within the overall reporting programme constraints, measured conditions may not be fully representative of the actual conditions. Any predictive or modelling work, undertaken as part of the commission will be subject to limitations including the representativeness of data used by the model and the assumptions inherent within the approach used. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions.

The potential influence of our assessment and report on other aspects of any development or future planning requires evaluation by other involved parties.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Total Ecology accept no liability for issues with performance arising from such factors

February 2008