



**Ecological Consultants
Environmental and Rural Chartered Surveyors**

Biodiversity Net Gain

Queens Park, Millom



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ACCURACY OF REPORT

This report has been compiled based on the methodology as detailed and the professional experience of the surveyor. Whilst the report reflects the situation found as accurately as possible, all of the protected species this survey covers are wild and can move freely from site to site. Their presence or absence detailed in this report does not entirely preclude the possibility of a different past, current or future use of the site surveyed.

We would ask all clients acting upon the contents of this report to show due diligence when undertaking work on their site and/or in their interaction with protected species. If protected species are found during a work programme, and continuing the work programme could result in their disturbance, injury or death, either directly or indirectly an offence may be committed.

If in doubt, stop work and seek further professional advice.

Quality and Environmental Assurance

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Contents

INTRODUCTION	5
Purpose of this Report	5
Ecological Context	5
Policy context.....	7
METHODS	7
Introduction	7
Biodiversity Assessment Methods.....	7
Habitat Distinctiveness	7
Habitat Condition.....	8
Strategic Location	8
Difficulty of Creation and Restoration.....	8
Time to Target Condition.....	8
Off-site Risk	8
BIODIVERSITY ASSESSMENT.....	9
Post-development Habitat Creation and Enhancement	14
Change in Biodiversity Value.....	16
REFERENCES.....	17
APPENDIX A – BASELINE DETAILED CONDITION ASSESSMENTS	18
APPENDIX B – POST DEVELOPMENT DETAILED CONDITION ASSESSMENTS.....	19

Planning Portal Questions

Please provide the date the onsite pre-development biodiversity value was calculated (this should be either the date of the application, or an earlier proposed date)	09.03.2026	
If an earlier date, to the date of the planning application, has been used, please provide details why this date has been used.	Site conditions have not changed between date of assessment and planning submission	
When was the version of the biodiversity metric published?	3 July 2025	
Please provide the pre-development biodiversity value of onsite habitats on the date of calculation	6.77	Habitat Units
	0	Hedgerow Units
	0	Watercourse Units
Please provide the reference or supporting document/plan names for the: i. Biodiversity metric calculation ii. Onsite irreplaceable habitats (if applicable) iii. Onsite habitats existing on the date of the application for planning permission (if applicable)	Biodiversity Net Gain Queens Park Millom	
	N/A	
	Biodiversity Net Gain Queens Park Millom	
Do you believe that, if the development is granted permission, the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended)) would apply?	Yes	
Has there been any loss (or degradation) of any onsite habitat(s), resulting from activities carried out before the date of the onsite pre-development biodiversity value was calculated. Either: - On or after 30 January 2020 which were not in accordance with a planning permission; or - On or after 25 August 2023 which were in accordance with a planning permission?	No	
Does the development site have irreplaceable habitats (corresponding to the descriptions in column 1 of [Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2023)) which are: i. On land to which the application relates; and ii. Exist on the date of the application for planning permission (or an earlier agreed date)	No	

INTRODUCTION

Purpose of this Report

Envirotech were requested to carry out a biodiversity assessment of Queens Park, Millom. The aim was for an ecologist with botanical expertise to carry out a site visit to map the habitat types present at the site in order to establish the biodiversity baseline.

Each habitat type was mapped using the standard habitat mapping convention using UK Habitat Classification V2 (Butcher et al., 2023) for the purposes of using the Defra metric.

Using the findings of the baseline surveys, pre-construction ecology was measured against proposed habitat changes arising from future ecological enhancements based on an Illustrative Plan (post-construction) provided by the client.

This report presents the results of this desk-based study to assess net change in biodiversity 'units' in connection with the removal of habitats for the proposed development at the site.

Ecological Context

The site is 2.05Ha and *Figure 1* shows the site location.



 Red Line Boundary

Figure 1
Location Plan



Policy context

The primary aims of Biodiversity Net Gain are to secure a measurable improvement in habitat for biodiversity, to minimise biodiversity losses and to help to restore ecological networks whilst streamlining development processes.

The National Planning Policy Framework (NPPF) makes provisions for the delivery of biodiversity net gain. Additionally, there is a 10% net gain requirement in the Environment Bill.

METHODS

Introduction

The statutory biodiversity metric is designed to quantify biodiversity to inform and improve planning, design, land management and decision-making (Natural England, 2024).

This study has been carried out as a desk-based exercise, using the results of field surveys carried out at the site by Envirotech and an Illustrative Plan provided by the client.

Biodiversity Assessment Methods

To calculate biodiversity units for the site and assess any changes arising from the proposed development this study uses methods set out the latest Statutory Biodiversity Metric user guide (Natural England, 2024).

The biodiversity metric uses three core measurements:

- Habitat area
- Length of linear terrestrial habitats
- Length of linear aquatic habitats.

Consequently, a site can have three biodiversity unit values, which are assessed using the same metric, but cannot be summed together.

Habitat area is multiplied by several factors that indicate its quality: distinctiveness, condition, strategic location and connectivity, and this gives its biodiversity unit value. This can be used for existing and future created habitats. In addition, when habitats are to be enhanced or newly-created, the risk of failure is accounted for by applying multipliers for risk factors (difficulty, time to target condition, and off-site risk).

Habitat Distinctiveness

Habitats are classified using the UK habitat classification V2 system (Butcher et al., 2023).

The metric pre-assigns each habitat type to a distinctiveness band according to its distinguishing features, i.e. species richness, rarity (at local, regional, national and international scales), and the degree to which it supports species rarely found in other habitats. On rare occasions, the habitat distinctiveness of a habitat can be altered up or down from the preassigned value. Any

alterations must then be fully explained using evidence relevant to the site, e.g. an increase in distinctiveness because of rare flora or fauna or a decrease in distinctiveness because of significant damage to the habitat.

Habitat Condition

Habitat condition measures the varying quality of similar habitats against what is perceived to be their optimal state. The statutory biodiversity metric technical supplement (Natural England, 2023) contains condition sheets for all habitats to which the metric can apply. The condition sheets contain a habitat description, contextual information to aid the assessment, and the assessment criteria. The criteria describe what components need to be present for a habitat to be in good, moderate or poor condition.

Strategic Location

Strategic location - sometimes called 'strategic significance' – works at a landscape scale, allowing additional value to be added to habitats in 'priority' or 'biodiversity target areas'. They include statutory and non-statutory sites and other areas with biodiversity value or potential, and they are mainly identified from local plans and objectives. If a habitat is within such a target area, a multiplier is applied to increase its value.

Difficulty of Creation and Restoration

The risks associated with creating new or enhancing existing habitats, are known as difficulty factors; for example, where habitats fail to establish owing to natural changes in local conditions, incorrect management or for unknown reasons. The statutory biodiversity metric contains default values for each habitat based on the average difficulty of creating or enhancing a habitat. Occasionally, under exceptional circumstances, these can be modified, but any deviation from the default value must be fully justified.

Time to Target Condition

There is often a lag between a habitat being removed and the new compensation habitats achieving their target condition. This gives reduced biodiversity value for a time. The statutory biodiversity metric preassigns the time to target condition based on good practice and typical conditions, and assigns a multiplier based on the number of years required to achieve it.

Using bespoke techniques under unique conditions, or creating compensation habitats prior to impacts taking place, the time to target condition can be adjusted. Any changes must again be fully justified.

Off-site Risk

Sometimes it is not possible to compensate adequately for loss of biodiversity within the site boundary, so off-site compensation is required. If the off-site compensation is a significant distance from the development site, then there will be a local loss of biodiversity and a multiplier is applied to any off-site compensation.

BIODIVERSITY ASSESSMENT

Baseline:

The sites baseline BNG value was calculated using the Statutory BNG metric and UKHabs v2 methodology. This was shown on Figure 2.

The baseline value for the site is as at 09.03.2026. This is the date that our assessment was undertaken. We consider there will have been no substantive changes to habitat condition at the time of the planning application being made.

We are not aware of any habitat features which have been purposefully degraded after 30th January 2020.

We consider planning permission, if granted, would be subject to the biodiversity gain condition

The type, area and distinctiveness values are shown on Table 1.



Habitat Parcel	Habitat	Irreplaceable Habitat	Area/Length	Distinctiveness	Notes
1	Other neutral grassland	No	1.2853	Medium	Perennial Ryegrass (<i>Lolium perenne</i>) (O), Yorkshire Fog (<i>Holcus lanatus</i>) (F), Cocksfoot (<i>Dactylis glomerata</i>) (F), Common Bent (<i>Agrostis capillaris</i>) (O), Creeping Buttercup (<i>Ranunculus repens</i>) (O), Red clover (<i>Trifolium pratense</i>) (O), Ribwort Plantain (<i>Plantago lanceolata</i>) (O), Marsh Thistle (R)
2	Modified grassland	No	0.1464	Low	Short mown grassland with rutting from cars. Species abundance difficult to assess due to short mowing regime. Perennial Ryegrass, Yorkshire Fog, Creeping Buttercup, Annual Meadow Grass, Daisy (<i>Bellis perennis</i>)
3	Developed land; sealed surface	No	0.2835	V.Low	Roads
4	Other woodland; broadleaved	No	0.0165	Medium	Mixed plantation woodland to roadside

Table 1- Habitat, Area and Distinctiveness Values

 	Other neutral grassland is rank, unmanaged with signs of vehicles driving over it
	Modified grassland is short mown with signs of vehicles driving over it

Table 2- Photographs of site

Avoidance: the first step of the mitigation hierarchy comprises measures taken to avoid creating impacts from the outset, such as careful spatial placement of infrastructure, or timing construction sensitively to avoid or disturbance. Examples include the placement of roads outside of rare habitats or key species' breeding grounds, or timing of seismic operations when aggregations of whales are not present. Avoidance is often the easiest, cheapest and most effective way of reducing potential negative impacts, but it requires biodiversity to be considered in the early stages of a project.

There are no irreplaceable habitats on the site

There are no Very High distinctiveness habitats on the site

There are no High distinctiveness habitats on the site

There are two Medium distinctiveness habitats on the site. These habitats are avoided where possible.

Minimisation: these are measures taken to reduce the duration, intensity and/or extent of impacts that cannot be completely avoided. Effective minimisation can eliminate some negative impacts, such as measures to reduce noise and pollution, designing powerlines to reduce the likelihood of bird electrocutions, or building wildlife crossings on roads.

Gardens are backed onto boundary areas of open land so that there is connectivity across the site boundary. POS is created to the site boundary in larger blocks. Pre-start checks will be made of habitats to ensure invasive species are not present on site and or are not spread off site. Build out of the scheme will be quickly as possible with landscaping prioritised in order that new habitats are created within 2 years of loss of baseline habitats.

Rehabilitation/restoration: The aim of this step is to improve degraded or removed ecosystems following exposure to impacts that cannot be completely avoided or minimised. Restoration tries to return an area to the original ecosystem that was present before impacts, whereas rehabilitation only aims to restore basic ecological functions and/or ecosystem services – such as through planting trees to stabilise bare soil. Rehabilitation and restoration are frequently needed towards the end of a project's life cycle but may be possible in some areas during operation.

New native tree planting will be undertaken. Whilst gardens are given a default low distinctiveness in BNG, they will be appropriately landscaped.

Grassland is enhanced with suitable management.

Collectively, avoidance, minimisation and rehabilitation/restoration serve to reduce, as far as possible, the residual impacts that a project has on biodiversity. Typically, however, even after their effective application, additional steps will be required to achieve no overall negative impact or a net gain for biodiversity.

Offset: offsetting aims to compensate for any residual, adverse impacts after full implementation of the previous three steps of the mitigation hierarchy. Biodiversity offsets are of two main types: 'restoration offsets' which aim to rehabilitate or restore degraded habitat, and 'averted loss offsets' which aim to reduce or stop biodiversity loss in areas where this is predicted. Offsets are often complex and expensive, so attention to earlier steps in the mitigation hierarchy is usually preferable.

Despite avoidance, minimisation and rehabilitation/restoration, onsite BNG can not be achieved. It is therefore proposed that offsite BNG units are purchased from a habitat bank in order that

development achieves an overall BNG score. Units in the same local authority area will be sought in preference to those nationally. In the absence of Units locally or nationally from a habitat bank, statutory credits will be used.

The UK Habs V2 habitat survey has been used to identify relevant habitat, hedgerow and watercourse units.

These habitats have been input into the statutory biodiversity metric calculator R2 and indicate a total of 6.77 area habitat units and ZERO hedgerow habitat units and ZERO watercourse habitat units. The results of the calculations are presented in the full biodiversity assessment calculation in the Excel document 'Biodiversity Net Gain Queens Park Millom'.

The condition assessments for each of the area habitats are presented in Appendix A. No deviations have been made from the default methods for baseline habitats assessment.

Post-development Habitat Creation and Enhancement

The Illustrative Landscape Plan has been used to identify that there will be two retained habitats, four enhanced habitats and seven new habitats.

These figures have been put in to the Statutory Biodiversity Metric and would comprise a total of 6.23 habitat units.

There are no changes to default values for post development habitats.

Details of the assumptions made to achieve the proposed conditions are found in Appendix B



Change in Biodiversity Value

Under the current proposals set out in the Illustrative Plan there will be a LOSS of 0.54 habitat units (-8.03%) and a gain of 0.79 Hedgerow units. This is shown in Table 3.

Table 3. Change in Biodiversity Units Calculation

On-site baseline	Area habitat units	6.77		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	6.23		
	Hedgerow units	0.79		
	Watercourse units	0.00		
On-site net change (units & percentage)	Area habitat units	-0.54	-8.03%	On-site net gain is less than target set ⚠
	Hedgerow units	0.79	N/A	Zero baseline units - % cannot be calculated
	Watercourse units	0.00	0.00%	
Off-site baseline	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.54		
	Hedgerow units	0.79		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.54		
	Hedgerow units	0.79		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-8.03%	Total net gain achieved is less than target set ⚠	
	Hedgerow units	N/A	0 baseline units - % cannot be calculated	
	Watercourse units	0.00%		
Trading rules satisfied?	No - Check Trading Summaries ⚠			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	6.77	7.45	1.22
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00
No additional hedgerow units required to meet target ✓				
No additional watercourse units required to meet target ✓				
Input errors/rule breaks present in metric ⚠				

REFERENCES

Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2023), UK Habitat Classification – Habitat Definitions V2.01 at <http://ukhab.org>

Natural England 2025. Natural England The Statutory Biodiversity Metric User Guide.

APPENDIX A – BASELINE DETAILED CONDITION ASSESSMENTS

This appendix presents the assessment of the post-development habitats against the condition sheets in the statutory biodiversity metric technical supplement published by Natural England, 2023. Any deviations from the published guidance is explained and justified.

UK Hab	Condition Sheet	Other Habitat Criteria Score									Total Score	Condition Assessment	Notes
		C1	C2	C3	C4	C5	C6	C7	C8	C9			
Modified Grassland	GRASSLAND: Low distinctiveness	F	F	P	F	P	P	P			4	Poor	Fails C1
Other neutral grassland	GRASSLAND: Medium-Very High distinctiveness	F	P	P	P	F	F				3	Poor	Damaged from flytipping, rutting ruderal species as not managed
Developed Land; Sealed Surface	Not assessed										-	-	-
Key: P – Criteria passed F – Criteria failed													
Appendix Table A1: Condition Assessment for Area Habitats													

UK Hab	Condition Sheet	Other Habitat Criteria Score													Total Score	Condition Assessment	Notes
		C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	C11	C12	C13			
Other Deciduous woodland	WOODLAND AND FOREST	2	3	3	3	2	1	1	2	1	2	1	1	2	24	Poor	Newly planted woodland to match existing
Key to woodland condition assessment: 3 (points) = Good 2 (points) = Moderate 1 (point) = Poor Total score >32 – Good Total score 26 – 32 – Moderate Total score <26 – Poor																	
Appendix Table A2: Woodland Condition Assessment																	

APPENDIX B – POST DEVELOPMENT DETAILED CONDITION ASSESSMENTS

This appendix presents the assessment of the post-development habitats against the condition sheets in the statutory biodiversity metric technical supplement published by Natural England, 2023. Any deviations from the published guidance is explained and justified.

UK Hab	Condition Sheet	Other Habitat Criteria Score									Total Score	Condition Assessment	Notes
		C1	C2	C3	C4	C5	C6	C7	C8	C9			
Modified Grassland	GRASSLAND: Low distinctiveness	F	F	P	F	P	P	P			4	Poor	Fails C1 and areas too small for active management
Other neutral grassland	GRASSLAND: Medium-Very High distinctiveness	P	P	F	P	P	F				4	Moderate	Open areas of grassland interplanted with bulbs and mown in late summer to create recognizable UK Habs grassland habitat
Mixed Scrub	Scrub	P	F	P	P	F					3	Moderate	Scrub to edge of woodland
Developed Land; Sealed Surface	Not assessed										-	-	
Garden	Vegetated Garden										-	-	
Urban trees	URBAN TREES	P	P	F	F	P	P				4	Moderate	Trees planted to edge of POS to allow for mowing but provide structure to boundary.
Key: P – Criteria passed F – Criteria failed													
Appendix Table B1: Condition Assessment for Area Habitats													

UK Hab	Condition Sheet	Other Habitat Criteria Score													Total Score	Condition Assessment	Notes
		C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	C11	C12	C13			
Other Deciduous woodland	WOODLAND AND FOREST	2	3	3	3	2	1	1	2	1	2	1	1	2	24	Poor	Newly planted woodland to match existing
Key to woodland condition assessment: 3 (points) = Good 2 (points) = Moderate 1 (point) = Poor Total score >32 – Good Total score 26 – 32 – Moderate Total score <26 – Poor																	
Appendix Table B2: Woodland Condition Assessment																	

UK Hab	Hedgerow Criteria Score										Condition Assessment	Notes
	A1	A2	B1	B2	C1	C2	D1	D2	E1*	E2*		
Native Hedgerow	F	F	P	P	F	F	P	F			Poor	Native hedgerows short trimmed and subject to damage/disturbance will score at least Poor
Key: P – Criteria passed F – Criteria failed * - Application to Hedgerows with trees only												
Appendix Table B3: Hedgerow Condition Assessment												