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Ecological Consultants
Environmental and Rural Chartered Surveyors

Biodiversity Net Gain

Woodlands Nurseries, Lowca

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Tel: 015395 61894
Email: info@envtech.co.uk
Web: www.envtech.co.uk
Envirotech NW Ltd
The Stables, Back Lane, Hale, Milnthorpe, Cumbria. LA7 7BL
Directors: A. Gardner BSc (Hons), MSc, MRICS, Dip NDEA
H. Gardner BSc (Hons), MSc, CEnv, MRICS
Registered in England and Wales. Company Registration Number 5028111

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

This report has been printed on recycled paper as part of our commitment to achieving both the ISO 9001 Quality Assurance and ISO 14001 Environmental Assurance standards. Envirotech have been awarded the Gold standard by the Cumbria Business Environmental Network for its Environmental management systems.

Author	Andrew Gardner	Date	26.2.25
Checked by	Andrew Gardner	Date	26.2.25
Report Version	1		
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Contents

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)	**26.2.25**	
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?	**23.7.24**	
Please provide the pre-development biodiversity value of onsite habitats on the date of calculation	**5.72**	**Habitat Units**
	0.21	**Linear Units**
		Watercourse Units
Please provide the reference or supporting document/plan names for the: i. Biodiversity metric calculation	**Biodiversity Net Gain Woodland Nurseries, Lowca**	
ii. Onsite irreplaceable habitats (if applicable)	**N/A**	
iii. Onsite habitats existing on the date of the application for planning permission (if applicable)	**Biodiversity Net Gain Woodland Nurseries, Lowca**	
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?	**Yes**	
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 Woodland Nurseries, Lowca. 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.

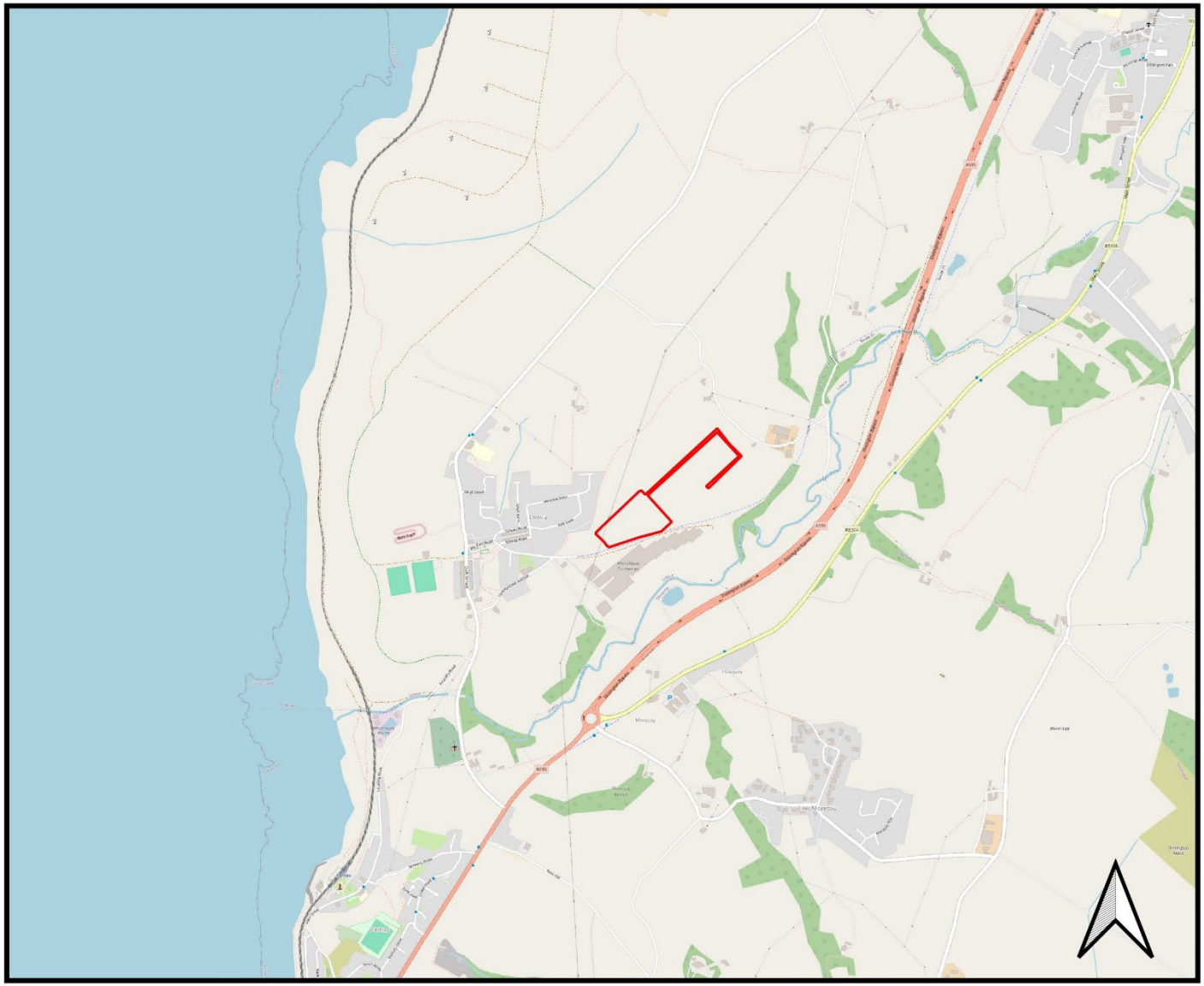
Each habitat type was mapped using the standard habitat mapping convention using UK Habitat Classification V2 (Butcher et al., 2023) for the purposes of using the Defra metric.

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 Landscape 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 2.93Ha and *Figure 1* shows the site location.



Red Line Boundary

Figure 1

Site Location

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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 Landscape 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 in the PEA report, as Figure 6, reproduced below.

The baseline value for the site is as at 23.2.2024. 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 aware of a hedge which was partially removed in 2022/23. The length of hedge removed has been retrospectively valued, based on the length of hedgerow retained.

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.

Figure 6

UK Habs V2 Map

Habitat Parcel	Habitat	Area/ Length	Distinctiveness	Notes
1	Modified grassland	2.5575Ha	Low	The entire site comprises modified grassland dominated by Perennial Ryegrass (*Lolium perenne)* with occasional Mouse ear *(Cerastium fontanum)*, Creeping Buttercup *(Ranunculus repens)* and Yorkshire Fog *(Holcus lanatus)* and Cocksfoot *(Dactylis glomerata)* to the field boundary/ hedgeline.
1	Modified grassland	0.3 Ha	Low	
2	Developed land; sealed surface	0.0763 Ha	V.Low	Glass houses
3	Native hedgerow	0.103Km	Low	A defunct hedge dominated by Hawthorn (Crataegus monogyna) with occasional Oak (Quercus Sp), Heavily flail mown, no associated hedgerow species at ground level other than Bramble (Rubus fruticosus agg) with intensive sheep grazing likely to have occurred. Hedge partly removed to East extent with fresh cut stumps at ground level.

Table 1- *Habitat, Area and Distinctiveness Values*

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 High or Very High distinctiveness habitats on the site
There are no medium distinctiveness habitats on the site.
All habitats impacted are low distinctiveness.

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.

Build out of the scheme will be quickly as possible with landscaping prioritised in order that new habitats are created within 2years 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 hedgerow will be planted.

Modified grassland will be enhanced to neutral grassland and managed by manual cutting.

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.

With avoidance, minimisation and rehabilitation/restoration, onsite BNG can be achieved.

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

These habitats have been input into the statutory biodiversity metric calculator R1 and indicate a total of 6.11 habitat units and 0.21 terrestrial linear units. The results of the calculations are presented in the full biodiversity assessment calculation in the Excel document 'Woodlands Nurseries BNG'.

The condition assessments for each of the area and linear 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 one retained habitat, two enhanced habitats and two new habitats. There will be one new linear habitat.

These figures have been put in to the Statutory Biodiversity Metric and would comprise a total of 6.38 biodiversity habitat units and 0.23 terrestrial linear biodiversity units.

The enhanced habitat area will consist of 0.63Ha of modified grassland to a bank to the North and part of the South and 0.3Hha of modified grassland to the South of the glasshouses, currently all poor modified, being enhanced to neutral grassland in moderate and good condition respectively.

The grassland will be over sown with wildflower seed appropriate to MG5 *Cynosurus cristatus - Centaurea nigra* grassland and managed by extensive cutting and removal of risings in order to improve condition.

A Bioswale will drain the ground.

A new native hedgerow will be planted on the site boundary.

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

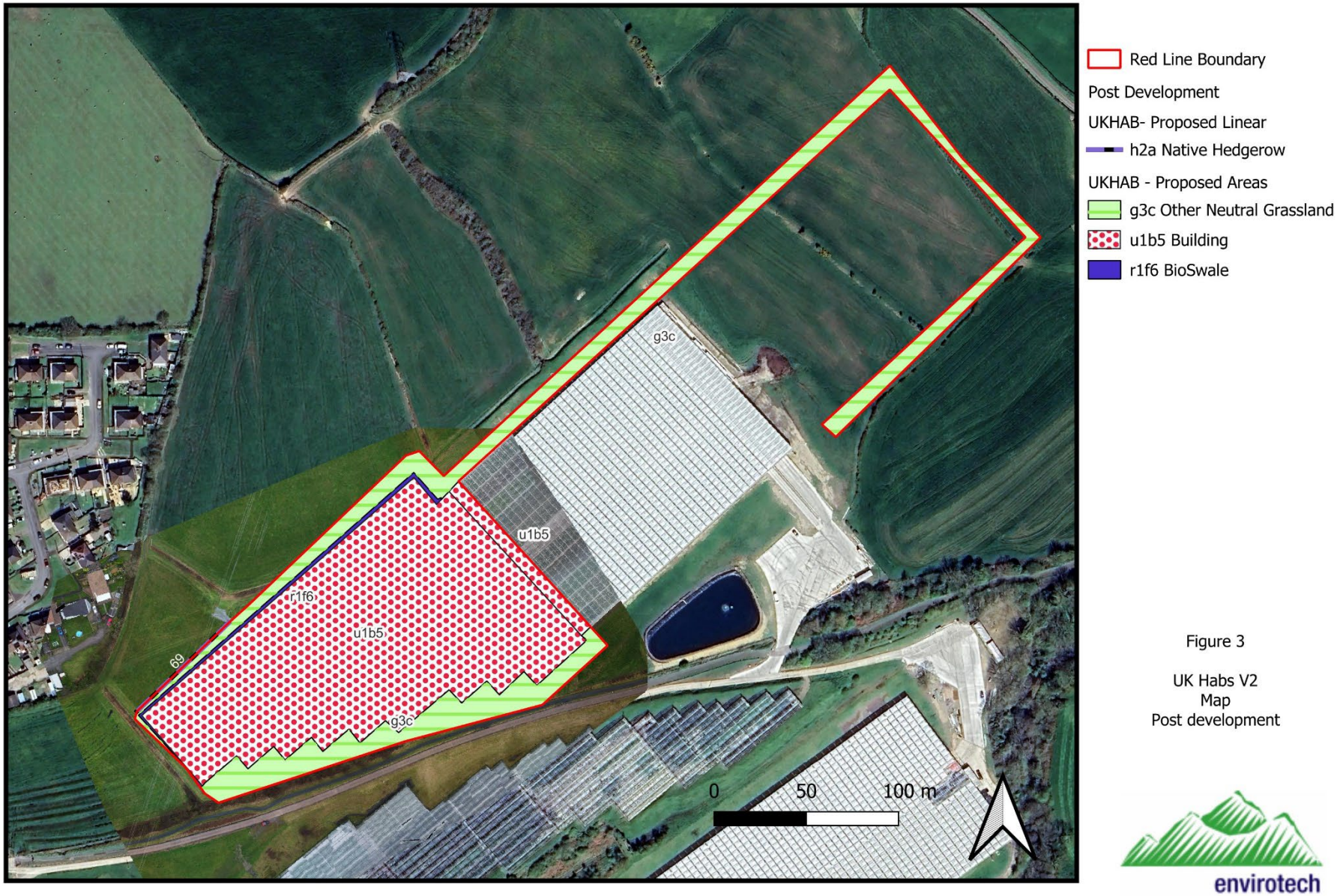

Figure 3

UK Habs V2
Map
Post development

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Change in Biodiversity Value

Under the current proposals set out in the Illustrative Landscape Plan there will be a GAIN of 0.66 biodiversity habitat units (+11.57%), and a GAIN of 0.02 terrestrial linear biodiversity units (+10.49%). This is shown in Table 2.

Table 2. *Change in Biodiversity Units Calculation*

On-site baseline	*Habitat units*	5.72	
	Hedgerow units	0.21	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	6.38	
	Hedgerow units	0.23	
	Watercourse units	0.00	
On-site net change (units & percentage)	*Habitat units*	0.66	11.57%
	Hedgerow units	0.02	10.49%
	Watercourse units	0.00	0.00%
Off-site baseline	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	*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)	*Habitat units*	0.66	
	Hedgerow units	0.02	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	*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)	*Habitat units*	0.66	
	Hedgerow units	0.02	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	11.57%	
	Hedgerow units	10.49%	
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	5.72	6.29	0.00	No additional area habitat units required to meet target ✓
Hedgerow units	10.00%	0.21	0.23	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

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 2023. Natural England The Statutory Biodiversity Metric User Guide (draft)

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 Equivalent	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	F	P	P			3	Poor	Fails C1
Developed Land; Sealed Surface	Not assessed										-	-	

Key:
P – Criteria passed
F – Criteria failed

Appendix Table A1: Condition Assessment for Area Habitats

Phase 1 Habitat	UK Hab Equivalent	Hedgerow Criteria Score										Condition Assessment	Notes
		A1	A2	B1	B2	C1	C2	D1	D2	E1*	E2*		
Intact Species-poor hedgerow	Native Hedgerow	P	F	F	F	F	F	P	F			Poor	Gappy, species poor, sheep grazed

Key:
P – Criteria passed
F – Criteria failed
* - Application to Hedgerows with trees only

Appendix Table A2: Hedgerow 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 Equivalent	Condition Sheet	Other Habitat Criteria Score									Total Score	Condition Assessment	Notes
		C1	C2	C3	C4	C5	C6	C7	C8	C9			
Other neutral grassland	GRASSLAND: Medium-Very High distinctiveness	P	P	P	P	F	F				4	Moderate	Bank to North, and part of South
Other neutral grassland	GRASSLAND: Medium-Very High distinctiveness	P	P	P	P	F	P				5	Good	Grassland to South in full sun
Developed Land; Sealed Surface	Not assessed										-	-	
Bioswale	Urban	F	P	P	P	F					3	Moderate	

Key:
P – Criteria passed
F – Criteria failed

Appendix Table B1: Condition Assessment for Area Habitats

Phase 1 Habitat	UK Hab Equivalent	Hedgerow Criteria Score										Condition Assessment	Notes
		A1	A2	B1	B2	C1	C2	D1	D2	E1*	E2*		
Intact Species-poor hedgerow	Native Hedgerow	P	P	P	P	F	F	P	F			Moderate	Newly planted

Key:
P – Criteria passed
F – Criteria failed
* - Application to Hedgerows with trees only

Appendix Table B2: Hedgerow Condition Assessment