

Our Ref: 784-B072252

Your Ref: 4/25/2163/0F1

FAO: Louise White

22 July 2025

Dear Louise,

784-B072252 FLEMING HALL, GOSFORTH 4/25/2163/0F1

The project is at Fleming Hall, Gosforth, Cumbria, CA20 1AD. The Proposed Development is for erection of a farm building. Planning application reference is 4/25/2163/0F1.

The applicant has provided the following documents:

- A Biodiversity Net Gain (BNG) Small Sites Metric (Small site metric Fleming Hall)
- Biodiversity Net Gain (BNG) Small Sites Metric Location Plan (bng_1).
- Location Plan (location_plan_144)
- Species Rich Grassland Management Plan (management_plan)

Comments BNG Location Plan and Metric.

1. A review of the site location plan shows the following areas: new farm building/proposed development and BNG site. These two areas are presented as separate boundaries on all plans. The Small sites metric (SSM) does not have an offsite tab. Therefore, either of the following is required:
 - a. To continue with the SSM approach, the site boundary should be re-drawn to include both areas. As the sites are nearby this is possible to do and keep the size of the development boundary below the 1ha threshold. Any habitats that fall within this new boundary should be included in the SSM as retained habitats.
 - b. If the BNG site is retained as an offsite area, the BNG should be submitted in the Statutory Biodiversity Metric (not the SSM), with a Biodiversity Gain Plan and the offsite area should be registered on the government website.

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2. The SSM supplied is not representative of the development. The SSM only shows the enhancement element of the development and not the area that is being lost to facilitate the new building.
3. 'Species rich grassland' is not a habitat type in the SSM or the Statutory metric. The correct post-development habitat type, that corresponds to the UK Hab V2 categories should be entered into the metric.
4. The photographs of the baseline (development area) within the supporting information tab of the SSM, appear to show a lot of bare ground. 'Urban – Bare ground' is a UK Hab V2 habitat type. It should be considered if 'modified grassland' is the most representative habitat type for this area and the most appropriate habitat entered into the metric.
5. When viewed on aerial photographs the area selected as the BNG enhancement area, appears to contain trees and a hedgerow. Trees and a hedgerow are also visible within the photos included in the supporting information tab of the SSM. All habitats that occur within the boundaries should either be entered into the metric or the boundary should be changed to exclude these. Any linear habitats (hedgerows) included in the metric should be entered into the hedges & lines of trees tab. Linear habitats require 10% net gain to be achieved separately from any area habitat gains.

Conclusion

The above comments should be reviewed and addressed and the BNG documents re-submitted for further consideration, before the application is processed.

Yours sincerely

Elizabeth Ferrier ACIEEM

Senior Consultant

For and on behalf of Tetra Tech Limited

Candice Howe CEcol MCIEEM

Associate

For and on behalf of Tetra Tech Limited