Biodiversity Net Gain Report
for
Cleator BESS

December 2025

CLEATOR BATTERY STORAGE LIMITED
C/O Gresham House Asset Management Limited
5 New Street Square
London
EC4A 3TW

25-043_R1

Contents

Revision	Date of issue	Comments	Written by	Approved by
0	09/12/25	R0 issued to client	DW	HH
1	18/12/25	Updated boundary	DW	HH

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1 Introduction

A Site visit to undertake a Biodiversity Net Gain assessment was undertaken on the currently active Cleator Battery Energy Storage System (BESS) Site (hereby referred to as the 'Site') at Cleator, Cumbria, on the 12th November 2025.

The survey work and subsequent reporting has been carried out on the instruction of Gresham House in the context of the preparation of a of a planning application to update and replace the equipment within the existing Site.

The Site is located at an approximate central grid reference NY 01045 13016, between Cleator and Woodend within Cumbria.

The Site is currently an active BESS, surrounded by a fence line. Within the fence line lies the current battery units. The proposed development lies largely within the existing fenced area, with the site to be extended to the south.

2 Methods

2.1 Desk Study

The desk study was undertaken by referring to the following data sources:

- Cumbria Biodiversity Data Centre (CBDC);
- Aerial mapping, including historic mapping where available;
- Ordnance Survey maps; and
- In-house knowledge of the local area.

2.2 Field Survey

Field surveys were completed of the Site in order to obtain detailed baseline information regarding the habitats and protected species present. The field survey was undertaken by Taxus Ecology ecologists Hannah Haggon and David White, both full members of the Chartered Institute of Ecology and Environmental Management (CIEEM). Further details on qualifications and experience can be provided on request.

2.3 Approach to BNG

This report has been completed following CIEEM Guidance, Biodiversity Net Gain Report and Audit Templates (2021), using the Statutory Biodiversity Metric Calculation Tool and mapping and measurements using QGIS 3.10.

2.4 Limitations

The PEA and BNG condition assessment was undertaken in winter, however, this has not affected the outcome of this report, with the habitat loss being so small and the habitats present largely artificial unvegetated, unsealed surface, and managed other neutral grassland.

3 Baseline Conditions

The Site consists of a fenced compound, which consists of compacted hardcore over weed membrane, with small concrete foundations beneath existing battery units. Very small amounts of vegetation is growing through the weed membrane, consisting of *Holcus Lanatus* (Yorkshire fog), however, the majority of this vegetation was dead. A grassland bund is present around the Site, with some small scrub/trees planted to the east and south sides.

The bund sides which fall within the fenceline include the following species: *Ranunculus repens* (Creeping Buttercup), *Arrhenatherum e*latius (False Oat-grass), *Rumex acetosa* (Common sorrel), *Plantago lanceolata* (Ribwort Plantain), *Poa* sp., *Dactylis glomerata* (Cock's-foot), *Cirsium arvense* (Creeping Thistle), *Achillea millefolium* (Yarrow), *Cirsium vulgare* (Spear Thistle), *Prunella vulgaris* (Selfheal), *Leontodon hispidus* (Rough Hawkbit), *Vicia* sp., *Chamaenerion angustifolium* (Rosebay Willowherb), *Taraxacum* spp. (Dandelions), *Trifolium repens* (White Clover), *Holcus lanatus* (Yorkshire-fog), *Geranium* sp. and *Ranunculus acris* (Meadow Buttercup).

The bund around the outside of the fenceline, on the bund created when the site was constructed, consists of the following species: *Cirsium arvense* (Creeping Thistle), *Agrostis capillaris* (Common Bent), *Holcus lanatus* (Yorkshire-fog), *Juncus effusus* (Soft-rush), *Urtica dioica* (Common Nettle), *Tussilago farfara* (Colt's-foot), *Ranunculus repens* (Creeping Buttercup), *Trifolium repens* (White Clover), *Taraxacum* spp. (Dandelions), *Vicia* sp. (Vetch sp.).

Young scrub/trees are present within this area, including the following species: *Crataegus monogyna* (Hawthorn), *Ilex aquifolium* (Holly), *Quercus robur* (Pedunculate Oak) and *Betula* sp. (Birch sp.). A patch of dense *Rubus fruticosus* (Bramble) is present to the north, outside of the fenceline.

4 BNG Good Practice Principles for Development

4.1 Principle 1 – Apply the Mitigation Hierarchy

Copeland Borough Council has a requirement for the application of the mitigation hierarchy of avoidance, mitigation/minimisation, remediation and compensation. This principle is also integral to Biodiversity Net Gain – Good Practice Principles for Development (CIEEM, 2019). This has been achieved as follows:

- Avoid: The Site is an existing battery storage site, which is considered of low ecological value. No habitats of high ecological value will be removed as a result of this development.
- Minimise: The effects on the existing Site have been minimised as much as possible. All habitats of higher value have been avoided during site selection.
- Remediate: Where grassland is lost to the development, there will be an aim to enhance or create other areas of grassland outside of the development.
- Compensate: No land is available within the compound for compensation, therefore biodiversity gains will be off-site, supplied by a habitat bank.

4.2 Principle 2 – Avoid losing biodiversity that cannot be offset by gains elsewhere

The Site is located within an already existing battery storage site, with the grassland habitats within the fence line being subject to ongoing management which does not encourage biodiversity. A small area of grassland will be lost, this is moderate condition other neutral grassland with no shortage of similar habitat in the area.

4.3 Principle 3 – Be Inclusive and equitable

Stakeholders such as the LPA and local records centre have been consulted through the planning process.

4.4 Principle 4 – Address risks

Risk associated with the implementation are largely associated with the proposed habitat not meeting the proposed conditions. A management and monitoring plan will ensure that habitats maintain their required conditions.

4.5 Principle 5 – Make a measurable Net Gain

The current DEFRA Statutory Metric has been used in order to calculate the habitats required in order to achieve a 10% biodiversity net gain.

4.6 Principle 6 – Achieve the best outcomes for biodiversity

The habitats selected for enhancement seek to provide appropriate, quality habitats, suitable for the locality.

4.7 Principle 7 – Be additional

If no development takes place at this Site it would be retained as current and would not be enhanced for conservation in any way.

4.8 Principle 8 – Create a Net Gain legacy

The BNG will be monitored and managed for 30 years, the management will be pragmatic and adapted in order to maintain suitable habitat conditions required.

4.9 Principle 9 – Optimise sustainability

The development is for a battery storage site, this provides essential power infrastructure to support the increase of electricity produced by renewable sources.

4.10 Principle 10 – Be transparent

This report and monitoring reports will be submitted to Copeland Borough Council planning department where it will be made available to members of the public or stakeholders as required.

5 Proposed Design

The development will result in the loss of 0.0946ha of other neutral grassland in order to extend the BESS infrastructure.

The Site is currently 0.59ha, comprised of the following habitats:

- 0.1081ha of artificial unvegetated, unsealed surface;
- 0.4288ha of other neutral grassland in moderate condition;
- 0.0124ha of bramble scrub; and
- 0.0429ha of developed land; sealed surface.

6 Biodiversity Net Gain Metric

This section should be read alongside the BNG Plans in Appendix A.

6.1 Current baseline

The Site is currently 0.59ha, comprised of the following habitats:

- 0.1081ha of artificial unvegetated, unsealed surface (0 habitat units);
- 0.4288ha of other neutral grassland in moderate condition (3.44 habitat units);
- 0.0124ha of bramble scrub (0.05 habitat units); and
- 0.0429ha of developed land; sealed surface (0 habitat units).

This is a total baseline for the Site of 3.48 habitat units.

6.2 Proposed habitat creation

The proposed development will create 0.0946ha of artificial unvegetated, unsealed surface, from the loss of other neutral grassland.

6.3 Proposed habitat enhancement

No habitat enhancement is proposed as a result of this development.

This results in a loss of 0.76 habitat units (21.79%).

6.4 Proposed offsite mitigation

A habitat bank will be utilised to source land to offset the 0.76 habitat unit loss which results from this development, 1.11 habitat units will be required to provided the required 10% biodiversity net gain.

7 Project Implementation and Construction Plan

The implementation of the BNG planting, habitat enhancement and habitat creation will be the responsibility of the habitat bank and secured through legal agreements.

8 Biodiversity Net Gain Management and Monitoring Plan

The implementation of the BNG Management and Monitoring Plan will be the responsibility of the habitat bank and secured through legal agreements.

9 Conclusion

This report has detailed the Site background, the habitat loss associated with the proposed development and the proposed pathway to offsetting the net loss. Through the use of a habitat bank, at least a 10% biodiversity net gain will be achieved as a minimum.

Appendix A

Habitat Map

Cleator

- Artificial unvegetated, unsealed surface
- Other neutral grassland
- Developed land; sealed surface
- Bramble scrub
- Boundary

Version Number: 2 Version State: Final

Scale @ A3 1:750

Design by: DW	Date: 18/12/25
Drawn by: DW	Date: 18/12/25
Reviewed by: HH	Date: 18/12/25
Approved by: HH	Date: 18/12/25

Drawing ref: Cleator

TAXUS ECOLOGY

BNG Post Development

Cleator

- Artificial unvegetated, unsealed surface
- Developed land; sealed surface
- Other neutral grassland
- Bramble scrub
- Boundary

Version Number: 2 Version State: Final

Scale @ A3 1:750

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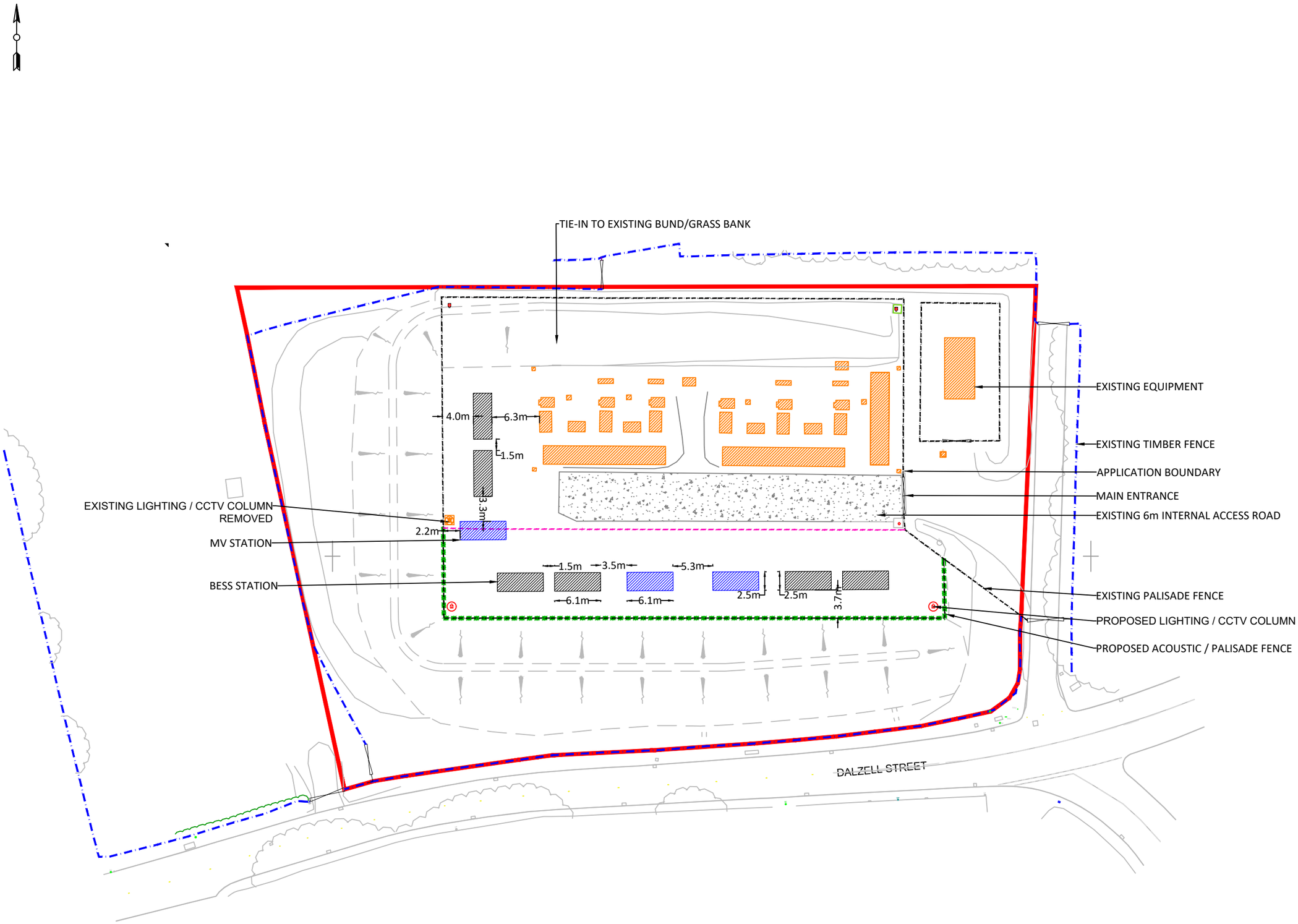
TAXUS ECOLOGY



NOTES
1. Do not scale
2. All dimensions in meters unless otherwise.
3. For planning only
4. Proposed fence (palisade or acoustic)
5. Bund extents indicative subject to detail design.

KEY

- EXISTING EQUIPMENT
- MV STATION
- BESS STATION
- EXISTING 6m INTERNAL ACCESS ROAD
- APPLICATION BOUNDARY
- EXISTING TIMBER FENCE
- EXISTING PALISADE FENCE
- EXISTING FENCE REMOVED
- PROPOSED ACOUSTIC/PALISADE FENCE
- PROPOSED BUND (SEE NOTE 5)
- EXISTING LIGHTING / CCTV COLUMN REMOVED
- PROPOSED LIGHTING / CCTV COLUMN

No	INFORMATION	By	Date	Chkd
C	Revised to planning comments	KT	07.12.25	PB
B	Revised to planning comments	KT	06.11.25	PB
A	First issue	KT	15.10.25	PB

REVISIONS

ISSUE: PLANNING

TITLE: CLEATOR ENERGY STORAGE FACILITY EXTENSION

CLIENT: GRESHAM

LOCATION: CLEATOR, DALZELL STREET CA22 2TA, UK

CAD REFERENCE: SOP_103_SITE LAYOUT

SCALE: 1:500	SHEET: A3
DRAWN BY: KT	DATE: 15.10.25
CHECKED BY: PB	DATE: 15.10.25

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