

Sarah Papaleo MRTPI
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You're Ref – 4/26/2063/0F1
Date – 10th March 2026

TWIN ELMS, LOOP ROAD, DISTINGTON, CUMBRIA CA15 6LS
PROPOSED DEMOLITION OF EXISTING HOUSE & CONSTRUCTION OF NEW THREE BEDROOM SELF BUILD
DETACHED DORMER

Dear Sarah,

Thank you for the ecological consultation comments provided in relation to the above application.

We have reviewed the matters raised alongside the submitted **Preliminary Ecological Appraisal (PEA)** and **Design and Access Statement**, and we provide the following response.

Bat Survey

The PEA identified the existing dwelling and associated outbuildings as having **low bat roost potential**, however we acknowledge the County Ecologist's request for a precautionary survey.

The applicant therefore confirms that:

- A **single dusk emergence or dawn re-entry survey** will be undertaken by a suitably qualified ecologist
- The survey will be completed during the **optimal survey season (May–August inclusive)**
- A short survey report will be submitted to the Local Planning Authority upon completion

This approach is considered proportionate given the **low roost potential identified within the PEA** whilst ensuring compliance with best practice ecological guidance.

Biodiversity Net Gain (BNG)

The applicant notes the comments regarding the requirement for Biodiversity Net Gain.

To ensure the planning submission is aligned with the current **DEFRA Biodiversity Metric**, the following actions will be undertaken:

- An updated **BNG assessment / metric calculation** will be prepared for submission to the Local Planning Authority
- Any **plant production or nursery areas** within the development will be classified as **Urban – Unsealed Surface** in accordance with the County Ecologist's advice
- The metric will demonstrate the baseline ecological position of the site and the proposed post-development habitat condition

Given the limited ecological value of the existing site and the small scale of development proposed, it is anticipated that the scheme will be capable of delivering a **neutral or positive biodiversity outcome through modest landscaping and ecological enhancements**.

Ecological Mitigation and Biodiversity Enhancements

In addition to the ecological mitigation measures identified within the submitted Preliminary Ecological Appraisal, the applicant has incorporated additional biodiversity enhancements within the proposed landscape design.

These include:

- Planting of **approximately 20 additional native trees within the retained woodland area** on the eastern part of the site to strengthen woodland habitat structure.
- Installation of **approximately 15 metres of new native hedgerow along the northern and eastern site boundaries**, providing enhanced habitat connectivity and strengthening the existing green infrastructure corridor.
- Installation of **integrated bat boxes and bird nesting boxes** within the development.
- Provision of **hedgerow access gaps within boundary fencing** to maintain wildlife permeability across the site.

These measures have been incorporated into the updated Biodiversity Net Gain assessment prepared using the DEFRA Small Sites Metric, which demonstrates that the development delivers a **measurable biodiversity net gain exceeding the statutory 10% requirement for both habitat and hedgerow units**.

Conclusion

The applicant is committed to ensuring the development proceeds in accordance with ecological best practice.

Accordingly:

- A precautionary **bat survey** will be undertaken and submitted
- An updated **BNG metric assessment** will be provided
- The ecological mitigation and enhancement measures within the PEA will be implemented

We trust the above provides sufficient clarification, however please do not hesitate to contact us should any further information be required.

Yours sincerely,

Daniel Sowerby BSc (Hons) C.Build E MCABE CIWFM MCIQB



Director
EDS Design Cumbria Ltd



Ecology Team Consultation Response	
Date:	10.03.2026
Planning Ref:	4/26/2063/0F1
Description:	Proposed demolition of existing house & construction of new three-bedroom self-build detached dormer bungalow.

Request for More Information: The County Ecologist requires the following information for this application to progress:

- **A Single Bat Survey**

The PEA report states that the building has low bat roost potential. In line with best practice guidance, one dusk emergence or dawn return to roost survey is required during the optimal activity season for bats (May to August inclusive). April and September are shoulder months and are not robust for one survey only.

- **Biodiversity Net Gain**

This development is in scope for Biodiversity Net Gain as it does not meet the exemptions criteria.

Please note that the plant production area will not be able to count towards the post-development BNG score as, by their nature, nurseries change through the production process. Therefore, the County Ecologist suggests that the habitat category for the plant production area is to go under Urban > Unsealed Surface rather than vegetative garden or introduced shrub.