Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment

Land at Salthouse Farm, Millom

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Report 0224/7

Updated February 2025 with BNG Assessment.

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EXECUTIVE SUMMARY

A Preliminary Ecological Appraisal was carried out on and around the small roadside land parcel at Salthouse Farm, Millom. It is proposed that the land is developed and a small number of houses are constructed.

The purpose of the survey was to identify protected and/or notable habitats and species which may be impacted by the proposed scheme, to determine the likelihood of these impacts and suggest whether further surveys are required to quantify these impacts or to propose mitigation to compensate for these impacts.

The initial habitat survey was carried out in February 2024. The site was re-visited in February 2025 once design plans had been finalised to confirm that there were no changes to the site, and the original survey findings were still valid.

A desktop search for records and information, a field survey, and a protected species data search were undertaken to establish species and habitats present on and in the near vicinity of the car park.

The proximity of the development to Duddon Estuary SSSI and Morecambe Bay SAC and SPA, and the location of the development at the periphery of the town means that there may be a need to consult with Natural England about the proposals with regard to potential impacts on these sites.

A total of 4 broad habitat types were recorded along in the survey area, and these were mapped and described in their local context. Of notable consideration were coastal and floodplain grazing marsh, which is present to the north, east and west of the site (but not in or immediately adjacent to the red line boundary).

Numerous records of notable and protected species were collected. These included records of breeding amphibians (including natterjack toad), terrestrial mammals and notable butterflies.

Due to the poor-quality habitat present on site, small size of the land parcel, and the close proximity of a busy road, working farm and residential properties, there is considered to be no significant scope for any notable or protected species to be present on site.

No further ecological surveys are required. Simple mitigation proposals are included regarding potential impacts on foraging terrestrial mammals and adjacent nesting birds (in hedges and trees off site).

The proposed development will result in the loss of ‘fairly low’ ecological quality modified grassland. The 5 new dwellings will each have front and rear gardens which will offset some of these losses. Due to the constraints on the site it is not possible to fully balance the BNG requirements, and as such an off-site location was found under the same ownership.

The off-site location (High Cross) has modified grassland present, which will be retained. The planting of 5 trees at the Salthouse Farm site, and 35 trees at the High Cross site will ensure that there is a suitable uplift in biodiversity units when the development is completed. The new measures will result in a 18.47% net gain across the two sites. All trading rules have been followed.

A planting, management and monitoring plan have also been included with this report.

Contents

1. INTRODUCTION

1.1 The aim of the survey

The aim of the survey was to identify any habitat or protected species issues or potential ecological constraints or concerns that would result from the development of a field at Salthouse Farm and construction of up to 5 residences.

The survey was carried out following technical guidelines provided by CIEEM (Chartered Institute of Ecology and Environmental Management) and mapped following UK Habitat Classification guidance (see Appendices for full references).

1.2 Biodiversity Net Gain

Following the Environment Bill 2021, a demonstrable net gain in biodiversity is required for most new developments (with some specific exceptions). This is mandatory for most projects from 12th February 2024, and for small sites from 2nd April 2024. As part of the assessment the current biodiversity value of the landholding is calculated, and compared with the likely biodiversity value of the land after the development after taking account of enhancement measures prescribed by the ecologist. The aim is for a minimum of a 10% gain in biodiversity value of the land after completion of the development.

The standard means of calculating Biodiversity Net Gain (BNG) is using the statutory DEFRA calculation tool. This site is small enough for the DEFRA Small Sites Matrix to be employed, but as off-site enhancements are required the Statutory tool has been used. The full details and calculations are included in the appendices.

1.3 Proposed works

The proposed works involve grading and re-profiling the land, construction of residential units and installation of relevant services.

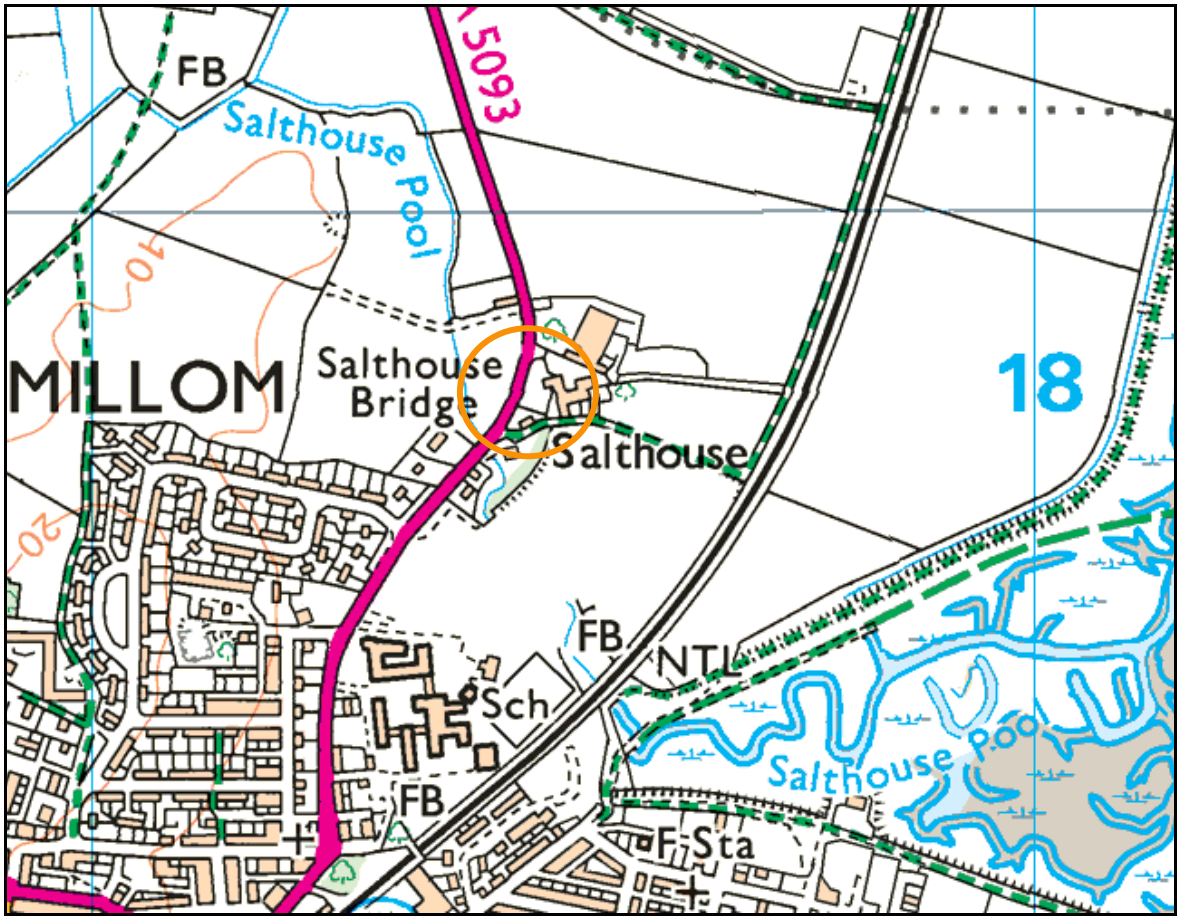
No timescale has been confirmed yet.

1.4 The survey area/ zone of influence

The habitat survey was carried out on the proposed works area (site central grid reference SD174 808) and, where possible, on all adjacent land and field parcels. A zone extending to 300m from the development footprint was surveyed from public rights of way and access land to establish whether any ponds likely to support great crested newts or natterjack toads were present.

The habitat survey was carried out in February 2024, at which time the detail of the proposal was not fully formed. The site was re-visited in February 2025 to update this survey report and provide details for the BNG assessment.

Figure 1: Location of land at Salthouse Farm, Millom



OS Map copied under licence (No. 100055725)

Figure 2: Aerial image showing surrounding habitat (red circle shows location)

Imagery date = 2018

2. SURVEY METHOD

2.1 Desktop study

Aerial photographs (Google Earth) and Ordnance Survey maps were used to assess the likely habitat types in and around the site, and to search for waterbodies that could host protected species such as great crested newts. Natural England and JNCC websites were used to obtain boundaries of any statutorily designated sites in the area.

Cumbria Biodiversity Data Centre was consulted and a data search requested for protected species within 2 km radius of the centre of the site.

2.2 Habitat survey

The extended phase 1 habitat survey was carried out by Tamsin Douglas MCIEEM (South Lakes Ecology) on February 23rd 2024.

The site was re-visited on February 7th 2025 by Tamsin Douglas, to establish whether any material changes had been made to the site, and to confirm that the original survey results and conclusions are still valid.

The area was walked over, and habitats within the study area were described and mapped using standard UK Habitats Classification methodology (UKHab 2020). The Professional edition of the UKHab guidance was followed, and habitats classed to level 5 of the hierarchy were applicable. Secondary codes were used with regard to land management, origin and habitat mosaics only. The minimum mappable unit was 25m², with target notes used to describe smaller features.

2.3 Protected species survey

Evidence of and potential for protected species was assessed on the site on 23rd February 2024. In particular, the potential for the following species/ animal groups was assessed:-

Birds

The site was assessed for its potential to support notable bird species, or important assemblages of wintering or passage birds. In particular the habitats on site were assessed for their potential and likelihood to support breeding birds, and any evidence/ sightings noted.

Reptiles

The site was assessed for its potential to support reptiles such as common lizard, slow-worm and adder, following guidance issued in the 'Herpetofauna Workers Manual'.

Amphibians

A search of the site was made to identify and assess any possible breeding ponds for amphibians, notably great crested newt *Triturus cristatus* and natterjack toad *Epidalea calamita*. Ponds within 300m of the proposed development were assessed for suitability to host great crested newt using methods detailed by Oldham *et al* (2000). An assessment was also made of the quality of the habitat for foraging and potential for hibernation sites. Survey was carried out following guidance published in the 'Herpetofauna Workers Manual'.

Bats

The site was assessed for its suitability for roosting, foraging and commuting bats. Trees, buildings and other structures were appraised for likelihood of hosting roosting and/or

hibernating bats, and topographical features of interest to commuting bats were noted. Survey followed methods described in the BCT Good Practice Guidelines (4th edition).

Terrestrial mammals

The potential of the site to support other protected terrestrial mammals, notably badger *Meles meles*, otter *Lutra lutra* and water vole *Arvicola amphibius* was assessed. Evidence of activity such as badger setts/ otter holts, paths, latrines, droppings/ spraints and feeding signs were noted and appropriate guidance followed.

Other species

Presence of and potential for other protected and/ or notable species was recorded.
Potential of the site to support important invertebrate assemblages was inferred from habitat quality, and any sightings recorded.

2.4 Invasive species survey

The presence of any invasive species within the survey area was recorded and mapped.

2.5 Survey constraints

The weather (sunny, cool with light breeze) was suitable for signs or sightings of most diurnal wildlife that is active in colder months, including most mammals. Recent daytime temperatures had been typical for mid-February, and therefore reptile sightings were unlikely, and amphibian activity was still limited. The likely presence of species mentioned above was inferred from the potential of the habitat to support them.

The time of year was not ideal for assessing botanical quality of mires and grasslands, as many plants have died back and species of interest are therefore harder to define.

The bird nesting season has not yet started, and likelihood of breeding birds being present on the site was inferred from the habitat.

3. BASELINE ECOLOGICAL CONDITIONS

3.1 Desktop survey results

3.1.1 Protected and statutory sites search

There is a large area of protected land within 5km of the property, the vast majority of which is designated for its coastal and inter-tidal habitats and species.

The site is just 300m from Duddon Estuary SSSI, and as such the Planning Authority may need to consult with Natural England regarding possible impacts of the development on this protected site. There are less than 10 proposed units, but the development is on the periphery of the town.

The proposed development is also very close to Morecambe Bay SPA and SAC (sites of European importance). Due to the terrain and the nature of the proposed works it is not considered that further assessment of impacts on these sites is likely to be required (Habitat Regulations Assessments) – but consultation with Natural England will provide further direction for the Planning Authority on this.

Table 1: Protected sites within 5km of proposed development

Protected area/ site	Description of interest	Distance from car park
Duddon Estuary SSSI	Coastal and intertidal habitats and species, notably wetland birds, natterjacks toads and invertebrates	350m south-east
Morecambe Bay and Duddon Estuary Special Protection Area	Breeding and wintering bird assemblages of International and national importance	350m south-east
Morecambe Bay Special Area of Conservation	Coastal and intertidal habitats of European importance	350m south-east
Millom Ironworks Local Nature Reserve	Natterjack toads, reptiles and flora of interest	750m south
Hodbarrow RSPB reserve	Notable birds, amphibians, reptiles, invertebrates, flora and coastal habitats	1.7km south
Shaw Meadows SSSI	Botanical	4.9km west

3.1.2 Notable habitats data search

Numerous notable habitats (listed under section 41 of the NERC Act 2006) were identified within 2km of the property. These were mostly coastal habitats within protected sites (SSSI, SAC and SPA), and included; Coastal saltmarsh, maritime cliffs and slopes, mudflats, saline lagoons, coastal & floodplain grazing marsh, pond, deciduous woodland, traditional orchards, replanted ancient woodland and ancient woodland.

The closest of these habitats are coastal and floodplain grazing marsh – which is adjacent to the land parcel to the south, and also surrounds the farm to the north and west. The small land parcel to the north is mapped as this habitat, but is covered by mature trees so this is not accurate.

There are no notable habitats mapped on the land parcel.

3.1.3 Protected and notable species search

The data search from Cumbria Biodiversity Data Centre provided detailed records of protected, rare, scarce and alien species within 2km radius of the proposed development.

A search was carried out on the Magic website, which shows all EPS (European Protected Species) licences, and records from great crested newt pond surveys. The closest positive record of great crested newt is from a site 6km west. There are negative survey records 3.6km to the north.

The EPS licence search provided records of natterjack toads 1.8km south-east of the site. There are no records for great crested newt or bats within 2km.

A total of almost 7400 records were produced by the data search, the vast majority of which were records of birds (over 6500 bird records). A table of key species which are of notable consideration within the context of this project is shown in Table 2 below.

Notable bird species have not been included in the table below, unless they are of specific interest to this project, or have further legislative protection, as all species of bird are protected whilst nesting. Bird records are also usually recorded at a tetrad (2km square) scale, so are over-represented in the data search as it will pick up records from up to 4 adjacent tetrads.

Invertebrate records are only included if they are within 500m of the site and likely to occur on habitats present on site.

Table 2: Species of conservation concern which have been recorded within 2km of the proposed site

Species	Priority species listed under s41 of NERC Act 2006?*?	Wildlife and Countryside Act 1981 (as amended) Sch 1,5 or 8.	Proximity to site	Number of records (most recent)
Palmate newt		Yes	1.2km	8 (2016)
Smooth newt		Yes	1.1km	33 (2017)
Natterjack toad	Yes	Yes	1.1km	179 (2016)
Common toad	Yes	Yes	0.4km	49 (2016)
Common frog		Yes	1.1km	22 (2014)
Common lizard	Yes	Yes	0.9km	12 (2016)
Hedgehog	Yes		0.4km	12 (2021)
Otter	Yes	Yes	0.4km	1 (2008)
Badger**			1.1km	3 (2010)
Bats (4 named species)	Yes	Yes	0.5km	22 (2014)
Red squirrel	Yes	Yes	0.7km	4 (2010)
Wall butterfly	Yes		0.3km	80 (2016)

**Previously BAP (Biodiversity Action Plan) priority species*

***Protected under Protection of Badgers Act 1992*

3.2 Habitat survey results

The habitats were mapped, following UKHab methodology (see methods section and appendices), as shown in Figure 3 in the appendices. Descriptions of the major habitats are given in section 3.2.2 below, and detailed target notes on habitats or species of interest included as appendices to this report.

Photographs of the area of the proposed works are provided at the end of the report.

Land adjacent to the site was assessed using binoculars, and is described in 3.2.4 below.

The update visit in February 2025 found no changes to the site, and that results from the 2024 survey were still valid.

3.2.1 Habitats recorded within survey area

- w1h Mixed woodland
- h2 Hedgerows
- g4 Improved pasture/ modified grassland
- u1 Built up areas and gardens

3.2.2 Habitat descriptions

w1h – Woodland - mixed

A small area of planted woodland (sycamore and pine) is present to the immediate north of the redline boundary. A larger linear woodland is present to the south, providing a narrow buffer between the school playing fields and adjacent residential properties and farmland. Species include beech, sycamore, pine and poplar with elder and hawthorn scrub.

Both of these areas will be of value to nesting birds, the larger woodland more so as it appears to be undisturbed and to have a diverse field layer. The small woodland is planted over g4 grassland, and there is no structure to the field layer. Both areas will provide woodland edge foraging habitat for bats, and the larger woodland is likely to be host to small terrestrial mammals and diverse invertebrate species.

Neither of these areas will be directly impacted by these proposals.

h2 - Hedgerows

Hedgerows (boundary line of shrubs over 20m long) are of intrinsic value, aesthetically, ecologically and functionally. They have value as stock proofing, but also for birds and small mammals as they provide food and shelter/ nesting opportunities. Hedgerows that aren't as intensively managed (not flailed annually) are of higher value as they offer more nesting potential for birds and generally produce more berries. Hedges can also form important flightlines (navigational tools) for bats, and can provide sheltered foraging areas for them. Hedgerows can also be of importance as 'wildlife corridors', linking larger areas of habitat such as woodlands.

There are tall hedgerow boundaries alongside Aggie's Lonnin (the track to the immediate south of the red line boundary). There is also a very small section of sycamore hedgerow just outside the development boundary to the south of the site (target noted as too short to map).

The small section of hedgerow is behind the boundary wall and is unlikely to be impacted by the proposals.

g4 – Modified grassland

This is grassland that is regularly and intensively managed – such as lowland grazing pasture, silage fields, or amenity grassland. Typically these grasslands are subject to frequent fertiliser and pesticide application, and have been seeded - supporting a limited diversity of widespread agricultural or amenity species. Modified grasslands such as these are usually of very limited value to wildlife, though surrounding good habitat, including hedgerows, can increase their value. In this coastal plain, however, these g4 grasslands are of greater value as they can be used as high tide roost areas by wintering and migratory birds, and can also provide habitat for natterjack toad. Grasslands such as this are designated as 'coastal and floodplain grazing marsh' – which is a priority habitat.

The g4 grassland to the west of the red line boundary, and surrounding the farm to the north and east is all designated coastal and floodplain grazing marsh on DEFRA's habitat map (Magic Map). None of this habitat will be impacted by the proposals.

The grassland on site is also classed as g4 grassland, but is not priority habitat (either on the online maps or from information collected for the field survey). The land has been previously disturbed, and there are old structures and footings from a demolished building. The field is surrounded by walls (concrete block and traditional stone), and heras fencing where there is no formal boundary. At the south-east corner is a mound of topsoil which has re-vegetated. Species present in the grassland include nettle, dandelion, creeping buttercup, sow thistle, clover, docks, and common mouse-ear. Cuckooflower, rushes, ragwort and daisy are also present in small numbers, and bryophytes are locally abundant. Grasses are dominant, but the time of year is not ideal for identifying species. Rye grass and cocks foot grass are both present. The structure of the grassland is uniform, presumably as a result of regular cutting. The soil is shallow in places, with exposed areas of rubble and concrete remaining from an old building on site. The field is small and isolated from other areas of habitat by the busy road immediately north, and housing and farmyard to the south.

The condition assessment places this in the 'fairly poor condition' category due to lack of variety in structure, isolation from other habitat of interest, thin soils and damage to the grassland from equipment and previous development.

The grassland on site is of limited value to wildlife as there is little structural or species diversity in the grassland, and the land is bordered by a busy road and farm buildings/ residential properties – so there are no direct connections to other areas of good wildlife habitat.

All of the g4 grassland on site will be lost to the proposals.

u1 – Built up areas & gardens

The other primary habitat surrounding the land parcel is urban land – comprising residential houses and gardens as well as farms and agricultural buidlings. Domestic and agricultural properties can support notable wildlife species such as nesting birds and bats. Depending on their management, gardens can provide excellent habitat for small birds, bats, hedgehogs, amphibians, reptiles and invertebrates.

Nearby records of hedgehog and red squirrel came from gardens within 400 to 700m of the development. Some of the amphibian records also originated from gardens, but the nearest records came from Millom Ironworks LNR to the west.

No gardens or surrounding properties will be directly affected by these proposals.

A summary table of the habitats described above and their importance in the context of British conservation and the legal framework is shown overleaf (Table 3).

Table 3: Habitats of conservation concern

Habitat	Priority habitat listed under s41 of NERC Act 2006?*	Is habitat a notable consideration?
Mixed woodland		
Hedgerows	Yes	Yes, but not directly impacted by these works
Improved pasture		
Urban habitat		

***** *Previously UK Biodiversity Action Plan (BAP) habitat*

3.2.3 Surrounding habitat (adjacent to red line boundary)

As described in the g4 grassland section above, the majority of the non-urban habitat surrounding the field parcel is designated as 'coastal and floodplain grazing marsh' – priority habitat. This is intensively grazed, flat coastal pasture which has value for coastal gulls and waders (as high tide roost and foraging sites) and also for natterjack toads. None of this priority habitat will be impacted by these proposals.

3.2.4 Ponds within 500m of the proposed development

Online aerial images and OS maps, and the walkover field survey, were used to identify any potential great crested newt or natterjack toad breeding ponds within 300m of the proposals. No such ponds were found. The A5093 runs immediately west of the land, and would be considered a barrier to amphibian dispersal inland of the property.

3.3 Protected and notable species survey results

3.3.1 Birds

Nesting birds are likely within scrub and trees surrounding the site, but there is no potential nesting habitat within the red line boundary. The grassland is short and surrounded by walls and urban habitat, so is not suited for ground nesting birds or waders. During the fieldwork singing greenfinch, chaffinch, blue tit and wood pigeon were heard (sound coming from the nearby woodland to the south).

Nesting birds are unlikely to be a concern for the development.

3.3.2 Reptiles

The habitat is not suitable for reptiles as it is short turf with compacted soil, and is surrounded by urban habitat and the A5093 – so not connected to any good quality reptile habitat.

It is highly unlikely that reptiles would be present on site.

3.3.3 Amphibians

No water bodies are known in the immediate area, and there are none on site. It is possible that amphibians could use the site for foraging, and could use the stone wall for hibernation, though this is considered unlikely as there is no good nearby breeding habitat, and the nearby busy road is a barrier to dispersal.

3.3.4 Bats

There are no suitable features on site for roosting bats. They could forage over the grassland in suitable conditions, but the site is unlikely to be of key importance due to its size and lack of features of interest.

3.3.5 Terrestrial mammals

No signs of terrestrial mammals were seen. The site is small and surrounded by urban habitat and roads, and most boundaries are walled, which would deter larger mammal species. It is possible that the site is used by hedgehogs (known to be active in the local area) and small mammals such as voles, though fairly unlikely due to the lack of nearby habitat and surrounding urban features.

3.3.6 Other species

Wall butterfly has been recorded on Aggie's Lonnin (the track immediately south of the land parcel). This is a priority species which is often found in coastal locations. Several widespread grass species are used as larval food plants, and the species is often associated with short turf, especially in previously developed land or coastal habitats. The grassland on site is short, but has few nectaring plants present – so is considered to be unlikely to appeal to adult butterflies, and therefore less likely to be used as an egg laying site.

No scope for other notable species was identified during the fieldwork or desktop searches.

3.3.7 Protected and notable species summary

There were no signs or sighting of protected or notable species within 50m of the proposals.

<u>There is considered to be no significant risk of protected or notable species being present on the development site.</u>

The potential for protected and notable species identified during the survey within 50m of the site was:-

- potential for nesting birds in nearby trees and scrub: moderate

3.4 Invasive species survey results

No invasive species were seen or recorded during the survey, and there were no nearby records in the data search.

4. SURVEY CONCLUSIONS

There are considered to be no features of ecological interest or concern which could affect, or be affected, by the proposed works.

This is as a result of the poor quality habitat present on site, small size of the land parcel, and the close proximity of a busy road, working farm and residential properties.

5. RECOMMENDATIONS

5.1 Recommendations for further survey

No further surveys are required for this project.

5.2 Recommended avoidance and mitigation measures for ecological impacts not requiring further survey

Nesting birds

Birds are likely to be nesting in hedges, trees and scrub surrounding the site. If any pruning of trees or scrub is required to facilitate access, then a nesting birds check should be carried out if this work is to be done between 1st March and 31st July (inclusive).

General

- Ensure that no dangers are left for wildlife overnight/weekends during the works (such as holes that could trap and potentially kill small mammals and amphibains).
- Ensure areas of importance to nocturnal animals are not disturbed by light – turn off all lighting overnight/ when works are not active.
- Minimise the footprint of the development, clearly marking the area in which machinery and plant is permitted.

6. Biodiversity Net Gain assessment

6.1 Rationale

The principles of Biodiversity Net Gain (BNG) are enshrined in local planning policy, and became a legal requirement for most developments from February 2024. The local planning authority (Cumberland Council) has requested a BNG assessment for this development, with a target increase of 10%. Habitats enhanced or retained as part of the BNG calculation need to be managed appropriately for a minimum of 30 years to satisfy the requirements of the metric.

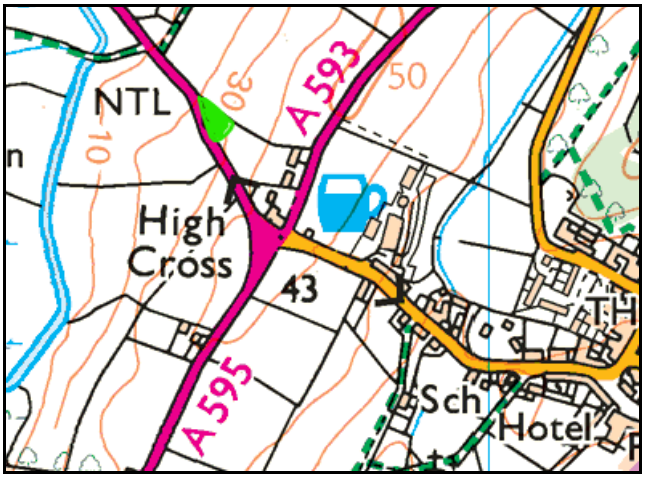
The area of the proposed development, and nature of the proposals mean that compensation for the biodiversity losses cannot all be accommodated on site. As off-site habitat needs to be included, the standard BNG metric is required to calculate losses and proposed gains. Detailed results are in the appendices and the Excel file with detailed calculations is attached separately.

6.2 Recommended measures

6.2.1 Off-site habitat description

As all of the Salthouse Farm site is required for the construction of the houses and their gardens, an off-site location was sought that was under the same tenure. Neil Price Ltd are developing a piece of land at High Cross on the edge of Broughton in Furness, and some of this is available for habitat enhancements (500m² in the north-west corner, at SD 2068 8187). There are no other constraints on the land (such as agri-environment agreements). See appendices for photos of the land.

Figure 3. Map showing off-site habitat to be enhanced (green shading).



The piece of land in question straddles two National Character Areas – West Cumbria Coastal Plain and Cumbria High Fells (the boundary between the two NCAs goes right through the field with no account of field boundaries). The habitats on the High Cross site are more akin to the West Cumbria Plain NCA, rather than the Cumbria High Fells NCA, and therefore for the BNG metric calculation it is considered to be in the same NCA as the impact site (Salthouse Farm is in the West Cumbria Coastal Plain character area).

The habitat comprises rough grassland, probably abandoned pasture. Grasses are robust, and bramble and agricultural herbs (dock, nettle and creeping buttercup) are frequent. Rushes are scattered in places, and there are patches of dense bryophytes on previous damaged land. There is extensive damage along the western edge of the field where machinery has been used to trim the overgrown hedge alongside the A595.

The habitat is classed as modified grassland (g4), and is assessed as being in moderate condition – losing points due to the abundance of bramble and extensive damage to the grassland from vehicles. There will be no further loss to this habitat, all the grassland will be retained.

6.2.2 Compensatory measures

Each of the proposed new properties at Salthouse Farm will have front and rear gardens. Though almost half of the area will be gardens, these areas do not have any associated condition assessment, and no further enhancements are possible. Further measures are required to achieve a 10% uplift in biodiversity value.

Some tree planting will be carried out on site and on the off-site habitat. A total of 5 trees will be planted at Salthouse Farm, and a further 35 will be planted at High Cross. All trees planted at High Cross will be locally native species as the site is within the Lake District National Park.

6.3 Metric calculations and conclusions

The proposed development will result in the net loss of 2663m² of g4 modified grassland (fairly poor condition) at Salthouse Farm, which includes all the grassland in the field and equates to 0.8 habitat units.

The modified grassland at High Cross (moderate condition) has a baseline habitat value of 0.2 units. There will be no loss of this habitat.

The construction of 5 properties with access routes and parking areas will create 1444m² of urban habitat with sealed surface. The remaining 1219m² on site will provide front and rear gardens for each of the properties, providing 0.26 habitat units. This still leaves a significant biodiversity loss according to the metric, which can be offset through tree planting on site and on the off-site location at High Cross.

Planting 5 new trees at Salthouse Farm, and 35 at High Cross will deliver a further 0.69 habitat units within the 30 year timeframe of the project.

A copy of the headline results page of the BNG calculation is shown in Figure 4 overleaf. These indicate that changes to the habitats on site, alongside tree planting on-site and off-site will result in at least 10% uplift in habitat units (18.47%). All trading rules have been followed.

Figure 4. Headline summary results showing trading rules have been followed and a suitable gain in biodiversity units is achievable.

Salthouse Farm			
Headline Results	Return to results menu		
Scroll down for final results ⚠			
On-site baseline	*Habitat units*	0.80	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.34	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	*Habitat units*	-0.45	-56.83%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	*Habitat units*	0.20	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.80	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	*Habitat units*	0.60	300.77%
	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*	0.15	
	Hedgerow units	0.00	
	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*	0.15	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	18.47%	
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

7. Implementation and monitoring

7.1 Planting plan

7.1.1 New gardens

Each new property will have a front and rear garden.

There is no condition assessment required for urban garden habitats, but there are several things that can be done to enhance the wildlife value. The best diversity of wildlife will be found in gardens with a variety of structure, species and flowering periods. Planting shrubs and small trees will provide height and shelter – and this can encourage birds and insects into the garden. Providing a variety of plants which flower throughout the season will ensure that the garden is attractive to pollinating insects (such as bumblebees and butterflies) throughout the spring, summer and autumn months.

For the very best wildlife gains in a garden creating a small wildlife pond brings a lot of interest into the garden (even if just one square metre in size). Planting fruit trees (apple, cherry or plum) is also very beneficial as they provide blossom for insects, nesting areas for birds, and food for birds and insects from any fallen fruit in autumn.

7.1.2 Tree planting – Salthouse Farm

It is proposed that 5 trees will be planted around the new properties at Salthouse Farm. These trees should either be native broadleaf species (such as those listed below), or fruit trees (such as cherry, apple or plum – dwarf varieties are acceptable). There is no minimum size that should be attained, but the trees should be classed as being in good ecological condition within 30 years. To achieve this they should be healthy with a robust canopy, with at least 20% of the canopy oversailing vegetation beneath.

1. Trees should be sourced from a reputable nursery, and be certified disease free.

2. Bare-rooted trees should be planted between November and March, but not in frozen or waterlogged ground.

3. Young saplings may need protection from voles and rabbits – so plastic guards are recommended. Support stakes are also recommended.

4. The new plants shouldn't need watering, unless there is extreme dry weather in the early part of the growing season (April- May).

7.1.3 Tree planting – High Cross

35 trees should be planted at High Cross. As this site is within the Lake District National Park, all species planted should be locally native and be of British provenance.

Recommended species include alder *Alnus glutinosa*, downy birch *Betula pubescens*, sessile oak *Quercus petraea*, goat willow *Salix capraea*, grey willow *Salix cinerea*, rowan *Sorbus aucuparia*, hawthorn *Cratauegus monogyna,* crab apple *Malus sylvestris* and elder *Sambucus nigra*.

The exact composition of the species planted can depend on availability of trees, but at least 12 of the trees should comprise alder, birch, oak and/ or rowan, and at least 12 being 'scrub' species such as willows, thorn, crab apple and elder. A minimum of 6 species should be planted.

As described above, there is no minimum size that should be attained, but the trees should be classed as being in good ecological condition within 30 years. To achieve this they should be healthy with a robust canopy, with at least 20% of the canopy oversailing vegetation beneath.

1. Trees should be sourced from a reputable nursery, and be certified native and disease free.

2. 1.25-1.5m tall bare-rooted trees should be planted between November and March, but not in frozen or waterlogged ground.

3. Ground surrounding the young saplings should be scarified, with robust herbs removed to ensure that the saplings establish well.

4. Young saplings may need protection from deer, voles and rabbits – so guards are recommended. Small plastic vole guards will protect against small mammal damage, but taller plastic tree guards used to protect from deer browsing can restrict the natural growth and form of the trees. It is recommended that six 2m x 2m post and rail cage enclosures with mesh surrounds are constructed. Within each cage a loose cluster of two large trees and three/four scrub species are planted to mimic natural tree regeneration.

Image 1. Recommended style of tree protection for in-field trees

5. The new trees should be planted at least 5m from the existing roadside hedge to ensure the new saplings are not shaded by the hedge.

6. The new plants shouldn't need watering, unless there is extreme dry weather in the early part of the growing season (April- May).

7.2 Management plan

7.2.1 New gardens

No specific management methods are required.

7.2.2 Trees at Salthouse Farm

The trees should be permitted to develop full crowns, and only be pruned when necessary. Tree tubes should be removed once saplings are well-established, as should the stakes (ensuring that the young trees develop suitably strong roots without relying on the additional support).

7.2.3 Trees at High Cross

As above, the trees should be permitted to develop full crowns. Given the location of the trees, trimming should not be necessary.

Vole guards should be removed and composted/ recycled as appropriate once the saplings are suitably established (probably after 2-3 years).

The fencing/ cage guards should only be removed once the trees are beyond the risk of damage from deer or any grazing stock that use the field– probably after 8-10 years of growth (once trees are at least 2.5m high).

7.3 Monitoring

The trees at both locations should be checked annually to ensure that they are establishing well. If any saplings fail to establish they should be replaced.

No monitoring is required for the garden habitats.

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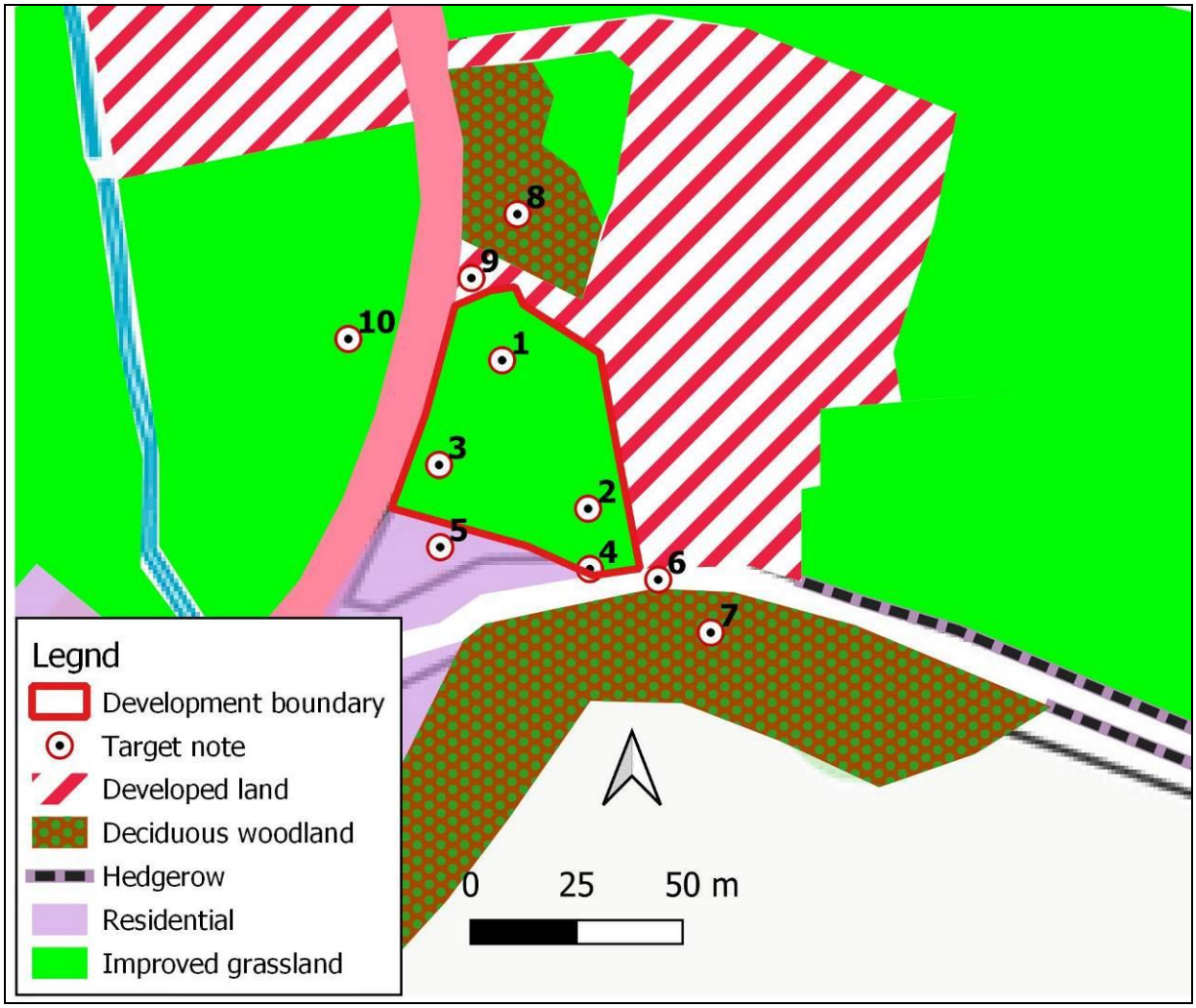
APPENDICES

Figure 5: Habitat map – Salthouse Farm (as existing)



Survey target notes

Refer to figure 5 for locations of target notes.

No.	Description
1	Short grassland, probably mown. Damp in places, and dominated by grasses. Most not identifiable at this stage of the season, but rye grass and cocks foot present. Herbs variable cover (10-40%). Creeping buttercup and dandelion frequent. Clover, common mouse ear and nettle locally frequent. Also present thistle, sow thistle, docks, daisy, ragwort and cuckooflower. Brypohytes locally abundant. Some indication of previous building – old footings, concrete and rubble present.
2	Scattered rubble by the boundary wall. Also young sycamore and buddleia saplings (not robust enough to support nesting birds).
3	Mound of topsoil. Covered by grasses, mostly undisturbed. Some standing water by drainage pipes. Likely to be very ephemeral as grass cover underneath.
4	Small section (4m) of hedgerow on non-development side of the boundary wall. Sycamore dominated.
5	Adjacent residential property with small garden.
6	Aggie's Lonnin – public right of way along a track towards the coast. Hedgerow boundaries, with woodland to the south. Likely to be used by nesting birds. Singing greenfinch, chaffinch, blue tit and wood pigeon heard during the survey – calling from this area.
7	Buffer woodland between school playing field and adjacent housing/ farmland. Sycamore, beech, poplar and pine seen through binoculars. Sycamore, elder and hawthorn present alongside the track.
8	Small mature plantation of sycamore and pine in short grassland by farm entrance. Not impacted by proposals.
9	Sealed entrance driveway to Salthouse Farm.
10	Adjacent improved pasture – all designated as Coastal and floodplain grazing marsh priority habitat.

Condition assessment of the two grassland areas

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)													
UK Habitat Classification (UKHab) Habitat Type													
Grassland - Modified grassland													
Habitat Description													
Modified grassland. Salthouse Farm small, enclosed, poor quality land parcel with low vegetation, and debris from previous structures on the land. High Cross - abandoned pasture with bramble and tall herbs, low species diversity, lots of damage from adjacent development and hedge cutting.													
ukhab – UK Habitat Classification													
On-site or off-site, site name and location	On-site - Salthouse Farm, Millom. Off-site - High Cross, Broughton-in-Furness	**Survey date and Surveyor name**	07.02.2025 Tamsin Douglas										
		Survey reference (if relating to a wider survey)											
Limitations (if applicable)		**Habitat parcel reference**											
		On site	Off site										
		Grid reference											
Condition Assessment Criteria		Salthouse Farm	High Cross										
		Criterion passed (Yes or No)											**Notes (such as justification)**
A	There are 6-8 vascular plant species per m^2 present, including at least 2 forbs (these may include those listed in Footnote 1). **Note - this criterion is essential for achieving Moderate or Good condition.** Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m^2 (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	Y	Y										
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	N	Y										Low grassland with no structure at Salthouse Farm
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble *Rubus fruticosus* agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y	Y										
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	N	N										Damage from vehicle tracks and machinery, and debris storage at Salthouse Fm
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)[2].	N	N										Both with more than 10% bare ground from damage (esp High Cross)
F	Cover of bracken *Pteridium aquilinum* is less than 20%.	Y	Y										
G	There is an absence of invasive non-native plant species[3] (as listed on Schedule 9 of WCA[4]).	Y	Y										
	Essential criterion achieved (Yes or No)	Y	Y										
	Number of criteria passed	4	5										
Condition Assessment Result (out of 7 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**											
Passes 6 or 7 criteria including passing essential criterion A	Good (3)												
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)	Y	Y										
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)												
Suggested enhancement interventions to improve condition score													
Salthouse farm grassland considered to be 'fairly low' ecological condition due to categories shown above, as well as isolation from other habitats (surrounded by buildings, farmyard and busy road).													

Description of Wildlife Law and Legislation referred to in this document

National Planning Policy Framework (2018)
Current guidance recommends that planners ensure that all new developments:

- minimise impacts on biodiversity and protected sites
- result in a measurable net gain in biodiversity
- safeguard wildlife-rich habitat and wider ecological networks
- promote conservation/ restoration and enhancement of priority habitats and ecological networks
- promote protection/ recovery of priority species

Nesting birds
Under Section 1 of the Wildlife and Countryside Act 1981 (as amended), wild birds are protected from being killed, injured or captured. Under this legislation their nests and eggs are also protected from being damaged, destroyed or taken (this includes nests in the process of being built as well as those with eggs and/or chicks in).

Birds which are listed in Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) are protected by special penalties at all times. Further enforcement has been provided by The Countryside and Rights of Way Act 2000.

Biodiversity Action Plans – Species and Habitats
The UK Biodiversity Action Plan (UK BAP) was published 1994, in response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992 in Rio de Janeiro. National and Local action plans were developed for the most threatened species and habitats.

The plans, and species and habitats to which they related are reviewed and updated regularly. The current lists can be found on the JNCC website. These have now been succeeded by NERC Act 2006 (see below) but are still commonly used for guidance.

Natural Environment and Rural Communities (NERC) Act 2006
Section 41 of the NERC Act 2006 requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The list has been drawn up in consultation with Natural England, as required by the Act. This purpose of this list is to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions.

56 habitats of principal importance are included on the S41 list. These are all the habitats in England that were identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework. There are 943 species of principal importance included on the S41 list. As above, these are the species found in England which were identified as requiring action under the UK BAP and which continue to be regarded as conservation priorities under the UK Post-2010 Biodiversity Framework.

Photographs

(All taken 23rd Feb 2024 unless stated otherwise)

Photo 1.
Looking from north over land parcel towards small sycamore plantation and the access road for the farmhouse.

Photo 2.
Looking across the land parcel to Salthouse Farm. Showing the short cut, grass dominated sward.

Photo 3.
Looking north east along the southern boundary and Aggie's Lonnin.

Piles of debris and rubble present. No sign of amphibians seen under debris.

Photo 4.
Showing the rubble present in the south-east corner of the site.
This has been well vegetated over and is dominated by grasses.

Photo 5.
Looking west along the block wall between the land parcel and adjacent residential property.
Showing the mound of soil and short section of hedge behind the wall.

Photo 6.
Looking south over the site towards adjacent residential property, showing temporary pools from overnight rain, and uneven ground from previous earthworks.

Photo 7.
Looking south over access gate over the whole land parcel.

Photo 8.
Looking south-west over access gate.

Photo 9.
Looking north along the western boundary of the site alongside the A5093.

Photo 10.
Looking east across the land, habitats as previously recorded.
Photo taken 7th Feb 2025.

Photo 11.
Looking NW over land at High Cross, with some tussocks, dock and rush.
Photo taken 7th Feb 2025.

Photo 12.
Looking south-east up the hill over land at High Cross showing extensive damage to the grassland along the hedgerow on the western edge.
Photo taken 7th Feb 2025.