



JLR Halewood

Eastlands Car Park

Biodiversity Net Gain Report





Type of document (version) Public

Project no. UK0028072.5026

Our Ref. No. 001

Date: April 2026

WSP

8 1st Floor Station House
Tithebarn Street, Exchange Station
Liverpool
L2 2QP

Phone: +44 151 331 8100

WSP.com

Quality control

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	First Issue			
Date	April 2026			
Prepared by	Nisha Choudhary			
Signature				
Checked by	Beth Hasell			
Signature				
Authorised by	Richard Brown			
Signature				
Project number	UK0028072.5026			
Report number	0028072-001			
File reference	JLR Halewood-BNG Report_Issue.docx			

Contents

	Executive Summary	1
1	Introduction	1
1.1	Document Purpose	1
1.2	Project Background	1
1.3	Biodiversity Net Gain Overview	1
1.4	Scope of Report	2
2	Methodology	4
2.1	Quality Assurance	4
2.2	Guidance and Tools	4
2.3	Data Sources	4
2.4	Relevant Date for Pre-development Biodiversity Value (On-site Baseline)	5
2.5	Biodiversity Gain Hierarchy	5
2.6	Strategic Significance	6
2.7	Additionality	6
2.8	Limitations	6
2.9	Assumptions	7
3	Results	8
3.2	Irreplaceable habitats	8
3.3	On-site Baseline Biodiversity	8
3.4	On-site Post-intervention Biodiversity	9
3.5	Off-site Biodiversity	11
3.6	Statutory Biodiversity Credits	11
4	Recommendations and Next Steps	12

5	References	13
	Appendix A – Baseline & Post-Intervention Habitat Maps	18
	Appendix B – BNG Legislation and Policy	20
	National legislation	20
	Appendix C – BNG Good Practice Principles (CIEEM, IEMA & CIRIA, 2016)	27
	Appendix D – Statutory Biodiversity Metric & Supplementary Files	33
	Appendix E – Condition Assessment Summary	35
	Appendix F – Post-development habitat translation	40

Tables

Table 2-1 – Strategic Significance Assignment	6
Table 5-1 – Condition Assessment Summary for Area Habitats and Hedgerows	35
Table 5-2 – Condition Assessment Summary for Post-Development Habitats	36

Figures

Figure 3-1 - On-site Headline Results	10
Figure 3-2 - Units Required to Achieve 10% BNG	11

Executive Summary

Consideration	Description	Reference(s) for further details
Document purpose/scope	The purpose of this document is to report the process and outcomes of a Biodiversity Net Gain (BNG) assessment completed to inform a planning application under the Town and Country Planning Act 1990.	Section 1.1 and Section 1.3
Applicant	JLR (the 'Client')	Section 1.1
Competent person(s) completing the Biodiversity Net Gain (BNG) assessment	Author: Nisha Choudhary, Graduate Consultant, MSc, BSc (Hons) Reviewer: Beth Hasell, Senior Ecologist, MSc, BSc (Hons) Authoriser: Richard Brown, Associate BNG Consultant MSc, BSc (Hons), ACIEEM	Section 2.1
Description of the development and planning permission reference number (if available)	The Client is proposing the clearance and development of a permanent Car park within the existing car plant, including clearance, excavation, levelling, installation of hardstanding and sealed surfacing, and the erection of security fencing.	Section 1.1.4
Statement that the applicant believes that the project is subject to the biodiversity gain condition*	The Proposed Development does not meet the criteria for BNG exemption, as defined by the Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b). The Client understands that, should planning permission be granted for the Proposed Development, it would be subject to the biodiversity gain condition under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	Section 1.1
Completed Statutory Biodiversity Metric tool provided*?	Yes	Appendix D

Consideration	Description	Reference(s) for further details
Baseline habitat map provided*?	Yes	Appendix A
Post-intervention habitat map provided*?	Yes	Appendix A
Baseline UKHab and condition assessment data provided?	Yes	Appendix E
Total on-site baseline area (ha)	5.13ha (excluding trees)	Section 3.3
Relevant date for the pre-development (baseline) biodiversity value*	The date of the planning application.	Section 2.4
Baseline degradation*	No signs of unauthorised or authorised habitat degradation were recorded; therefore, the relevant date is taken to be 02/12/2025. It is considered that the baseline survey data collected on 02/12/2025 reflects the habitats present on this date.	Section 2.4
Irreplaceable habitats*	No irreplaceable habitats were identified within the Site.	Section 3.2
Very high distinctiveness habitats	No very high distinctiveness habitats identified within the Site.	Section 3
Headline result: Estimated overall net change in biodiversity value	100% net loss of area habitat units (ABHUs). 100% net loss of hedgerow units (HUs).	See Figure 1 below this table for headline unit results. Results are further detailed in Section 3 .

Consideration	Description	Reference(s) for further details
Metric trading rules met?	No	Trading summary per habitat provided in the Metric toolkit
Evidence of avoidance and minimisation of adverse effects on biodiversity	Due to the nature of the Proposed Development, all habitats on site are proposed to be lost.	Sections 2.5 and 3.4
Evidence of Biodiversity Gain Hierarchy application to compensate for adverse effects	All area-based habitats present within the on-site baseline will be lost as a result of the Proposed Development. These losses are necessary due to the nature of the Proposed Development.	Sections 2.5 and 3.
Significant on-site enhancements	N/A	Section 3.4
Off-site enhancement and creation	N/A	N/A
Statutory biodiversity credits	Statutory biodiversity credits will only be considered as a last resort once all other options under the Biodiversity Gain Hierarchy have been exhausted.	Section 3.6
Additionality What counts towards your BNG.	There are no other habitat measures associated with the Proposed Development that require consideration for additionality, in line with government guidance.	Section 2.7
Application of 'Rule 4' of the Statutory Biodiversity Metric (exceptional ecological circumstances only).	N/A	N/A

Consideration	Description	Reference(s) for further details
Arrangements for habitat management and monitoring for 30 years.	Due to the loss of all on-site habitats, management and monitoring of habitats will be provided by a habitat bank provider, with units purchased by the Client.	N/A
Alignment with good practice	This BNG assessment has been undertaken in alignment with the most up-to-date statutory and local guidance and good practice.	Section 2.2 and Appendix C.
Summary of key recommendations	■ All feasible onsite options for habitat retention, enhancement and creation have been explored in accordance with the Biodiversity Gain Hierarchy. ■ Discussions with off-site providers will continue to take place and be finalised prior to the commencement of the construction.	Section 4
Summary of any key assumptions and limitations	■ It is assumed that all the habitats present on site are to be lost due to the creation of the developed land; sealed surface (u1b). No baseline habitats have been retained or enhanced due to the nature of the Proposed Development. ■ It is anticipated that the Habitat Units required to achieve the 10% net gain will be secured through the purchase of units from a habitat bank. The Client will submit the relevant details and supporting evidence of this purchase as part of the Biodiversity Gain Plan (BGP).	Sections 2.8 and 2.9 and Appendix F

*Information that forms the minimum information legally required to accompany planning application submissions.

Disclaimer

WSP has provided this report solely for the use of the recipient and accepts no liability to any third parties or any other party using or reviewing the report or any part thereof. WSP makes no warranties or guarantees, actual or implied, in relation to this report, or the ultimate commercial, technical, economic, or financial effect on the project to which it relates, and bears no responsibility or liability related to its use other than as set out within the scope of the contract under which it was supplied.

1 Introduction

1.1 Document Purpose

- 1.1.1. WSP UK Ltd. (WSP) was commissioned by Jaguar Land Rover (JLR) (herein referred to as “The Client”) to undertake a Biodiversity Net Gain (BNG) assessment for the creation of a Car park within JLR Halewood, Eastland Car Park, Liverpool L24 9BJ (herein referred to as the “Proposed Development”).
- 1.1.2. The Client understands that, should planning permission be granted for the Proposed Development, it would be subject to the biodiversity gain condition under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). The Proposed Development does not meet criteria for BNG exemption, as defined by the Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b).
- 1.1.3. The purpose of this document is to report the process and outcomes of a BNG assessment completed to inform a planning application under the Town and Country Planning Act 1990.
- 1.1.4. This report contains details relating to:
 - The BNG Statement to be submitted for planning application validation
 - The BNG assessment, which has been undertaken to calculate the net change in biodiversity units because of the Proposed Development.

1.2 Project Background

- 1.2.1. The Client is proposing the clearance and development of a permanent Car park within the existing car plant, including clearance, excavation, levelling, installation of hardstanding and sealed surfacing, and the erection of security fencing.
- 1.2.2. The Site is located to the east of the JLR complex, adjacent to one of the limited vegetated areas within the JLR complex at Ordnance Survey (OS) National Grid Reference SJ 45587 84249. Ecological reports were completed in 2016 and 2017 by (Arcadis, May 2016), for previous temporary planning applications.
- 1.2.3. The Site area is approximately 5.13 hectares (ha) based on its design at the time of this assessment and is defined by the red line boundary shown in **Appendix A, Figure 1**. This is hereafter referred to as the “Site boundary”.

1.3 Biodiversity Net Gain Overview

- 1.3.1. BNG is defined by the Department for Environment, Food, & Rural Affairs (Defra) as an approach to development that makes sure that habitats for wildlife are left in a measurably better state than they were before the development (Defra, 2024a).

- 1.3.2. In England, a minimum 10% BNG is mandatory for major developments and small sites under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a).
- 1.3.3. The BNG process follows the mitigation hierarchy, which sets out that everything possible must be done to firstly avoid, secondly minimise and thirdly restore/rehabilitate losses of biodiversity on-site. Only as a last resort, residual losses are compensated for using off-site habitat enhancement or creation (also known as biodiversity offsetting).
- 1.3.4. Mandatory BNG also requires the application of the Biodiversity Gain Hierarchy (Defra, 2024b), which specifies that:
 - *“first, in relation to on-site habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and*
 - *then, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.”*
- 1.3.5. Mandatory BNG must be assessed by a competent person using the Statutory Biodiversity Metric (herein referred to as “the Metric”) and its associated rules and guidance (Defra, 2024c). The Metric accounts for habitat losses and gains resulting from development and quantifies the net change in biodiversity value, measured in ‘area habitat units’, ‘hedgerow units’, ‘ and ‘watercourse units’¹. The Metric guidance also states that up-to-date industry good practice principles (CIEEM, CIRIA & IEMA, 2016) and version 2.0 should be applied.
- 1.3.6. BNG cannot be applied to adverse effects on irreplaceable habitats (Defra, 2024e). BNG is additional to other legislative requirements relating to habitats and species, although mitigation/enhancement from certain schemes can count towards BNG either in full or in part (Defra, 2024f).

1.4 Scope of Report

- 1.4.1. The Client has committed to a minimum 10% BNG target for the Proposed Development, in line with the Environment Act 2021 (HM Government, 2021a) and (Knowsley Local Plan Core Strategy, 2016).
- 1.4.2. The remainder of this report and associated appendices describe the BNG assessment methods, results, and recommendations for the following aspects of the Proposed Development, aligning with the Biodiversity Gain Hierarchy (Defra, 2024b):

¹ The minimum 10% BNG target applies separately for each type of unit, and these cannot be summed or traded.

1. The pre-development (baseline) biodiversity unit value of on-site area habitats, hedgerows/lines of trees, calculated using the Metric.
 2. The estimated units to be retained, lost, enhanced, and created on-site, based on the Proposed Development's design.
 3. The resulting overall net change in **on-site** biodiversity unit value (i.e., whether the Proposed Development achieves an on-site net loss, no net loss, or net gain in biodiversity units).
- 1.4.3. It is important to recognise that BNG is one of several factors to be considered when assessing the impact of the Proposed Development on biodiversity. Please note that this BNG report does not cover potential impacts of the Proposed Development on protected species or designated sites, although the BNG design has been aligned with these wherever possible. These aspects are covered within the Preliminary Ecological Appraisal (PEA) (WSP, 2026).
- 1.4.4. This assessment has been compiled with reference to relevant legislation and policy relating to nature conservation and BNG, listed in **Appendix B**.

2 Methodology

2.1 Quality Assurance

- 2.1.1. This report and the Metric calculation have been completed and quality assured by a team of ecologists competent in BNG, with over 10 years' collective experience of BNG assessment.
- 2.1.2. Baseline habitat surveys were completed by a competent WSP ecologist who is an Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and is experienced and proficient in undertaking surveys of this type.

2.2 Guidance and Tools

- 2.2.1. This BNG report and approach have applied the following guidance and tools:
 - UK Government Biodiversity Net Gain Collection (Defra, 2024g);
 - Statutory Biodiversity Metric and associated user guidance (Defra, 2024c), including the associated rules and principles set out in the Metric User Guide;
 - Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, CIRIA & IEMA, 2016). These are listed in **Appendix C**;
 - Biodiversity Net Gain: Good Practice Principles for Development – a Practical Guide (CIEEM, CIRIA & IEMA, 2019);
 - British Standard 8683 Process for designing and implementing Biodiversity Net Gain – Specification (2021) (British Standards Institute, 2021);
 - Biodiversity Net Gain Reporting and Audit Templates (CIEEM, 2021);
 - Knowsley Council Local Plan Core Strategy (January 2016);
 - Saved policies of the Unitary Development Plan (adopted June 2006);
 - Liverpool City Region BNG Guidance Note (2025) and
 - Liverpool City Region Local Nature Recovery Strategy (2025) (in draft)

2.3 Data Sources

- 2.3.1. The following data sources have been used to complete the Metric calculation:
 1. An initial desk study using publicly available and local datasets to identify potential/likely Habitats of Principal Importance (HPI), irreplaceable habitats, and statutory and non-statutory designated sites for nature conservation. The desk study is described further in the PEA (WSP, 2026).
 2. A UK Habitat Classification (UKHab) (UKHab, 2023) and Metric habitat type survey undertaken on 2 December 2025 and updated on 26th March 2026 following best practice guidelines. This survey provided baseline habitat data detailing the habitat types

present on-site, their area (ha), and their geographic distribution. Full details of the survey method are provided within the PEA (WSP, 2026). All areas/lengths of habitats have been measured using ArcGIS Pro with reference to Google Earth Aerial Imagery. Habitat survey data have been provided within Appendix A and PEA (WSP, 2026).

3. Condition assessments for area habitats are completed concurrently with the baseline habitat survey, following the Metric Condition Assessments Criteria (Defra, 2024c). A summary of the condition assessment results is provided in Appendix E. Detailed condition assessments per individual habitat parcel are provided within the supplementary dataset (see Appendix D).
4. A Landscape plan used to identify post- intervention habitat provided by Ridge Planning Consultants, the Planning Agent in March 2026, indicating areas of habitat to be created on site. This plan was translated into post-development Metric habitat types for use in the assessment, see Appendix F for habitat translation). Post-development habitats are visualised in (**Appendix A, Figure 2**).

2.4 Relevant Date for Pre-development Biodiversity Value (On-site Baseline)

- 2.4.1. The metric calculation has been carried out based on on-site baseline habitats present on the 'relevant date'². This was determined based on the date of the planning application and whether authorised habitat degradation had been carried out since 25 August 2023 or unauthorised habitat degradation had been carried out since 30 January 2020.
- 2.4.2. No signs of habitat degradation were recorded; therefore, the relevant date is taken to be the date of the planning application. It is considered that the baseline survey data collected on 2 December 2025 and updated on 26th March 2026 reflect the habitats present on this date.

2.5 Biodiversity Gain Hierarchy

- 2.5.1. The Proposed Development has been designed in accordance with the Biodiversity Gain Hierarchy (Defra, 2024b). This has been achieved through engagement with the design process from an early stage and at key milestones, including feeding into discussions with engineers/planners about the location of the Site Boundary to avoid and minimise adverse impacts. All feasible opportunities for on-site enhancement and creation for BNG were then identified in collaboration with the engineers, planners, landscape team, wider ecology team and the Client. Off-site opportunities are to be explored with key stakeholders/partners as part of a strategic approach to delivery, prior to sourcing the remaining off-site units from the market. The purchase of biodiversity credits was considered only as a last resort.

² As defined in paragraph 5 of Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 (HM Government, 1990).

2.6 Strategic Significance

- 2.6.1. Strategic significance has been assessed using the categories set out in Table 8 of the Biodiversity Metric User Guide (Defra, 2024) and guidance from the Local Planning Authority (Knowsley Council). As the Liverpool City Region LNRS is not yet published as summarised in **Table 2-1**, the assessment relies on:
- Knowsley Local Plan Core Strategy, 2016 – Policy CS8 (Green Infrastructure)
 - Draft LNRS (Liverpool City Region, 2025); and
 - Guidance Note on Mandatory Biodiversity Net Gain and its Implementation in the Liverpool City Region, 2025.
- 2.6.2. Relevant Local Plan policies include:
- Policy CS8 – Green Infrastructure: Protect and enhance Knowsley’s green network.

Table 2-1 – Strategic Significance Assignment

Strategic Significance	Habitats Assigned and Reasoning
High (Formally identified in local strategy)	The small area of modified grassland with line of trees within the Site is mapped or described as locally ecologically important in the adopted Knowsley Local Plan or LNRS priority areas.
Medium (Location ecologically desirable but not in local strategy)	Based on the LCR mandatory guidance note, no habitats will be classified as medium as per paragraph 3.66.
Low (Area not in a local strategy)	Definitions for High are not met. Habitat is not mapped in local strategy and does not provide strategic connectivity.

2.7 Additionality

- 2.7.1. There are no habitat creation or enhancement measures associated with the Proposed Development that require consideration for additionality, as they are all measures that can be counted ‘in full’ in line with government guidance on what counts towards your BNG (Defra, 2024f).

2.8 Limitations

- 2.8.1. The initial UKHab survey was undertaken over a single day in December, which is recognised as a sub-optimal period for botanical recording and therefore initially limited the ability to identify the full range of species present on Site. However, this limitation has now been addressed through an updated survey undertaken on 26th March, a more suitable

period for habitat and early-season botanical assessment. The March survey allowed for improved identification of vegetative features and provided a more reliable understanding of the Site's ecological conditions. By integrating findings from both field surveys alongside desk-study information, a robust and well-informed evaluation of the Site's potential to support protected or conservation-notable species has been achieved.

- 2.8.2. Due to the nature of the Proposed Development, it is difficult to avoid and minimise adverse impacts on biodiversity within the Site Boundary in line with the design and health and safety standards. No habitats present on the site have been retained or enhanced.

2.9 Assumptions

- 2.9.1. It is anticipated that the Habitat Units required to achieve the 10% net gain will be secured through the purchase of units from a habitat bank. The Client will submit the relevant details and supporting evidence of this purchase as part of the Biodiversity Gain Plan (BGP).

3 Results

- 3.1.1. This section provides a summary of results for the Proposed Development, including the on-site baseline and post-intervention biodiversity. Further detailed quantitative results are provided within the Metric toolkit(s) (see **Appendix D**).

3.2 Irreplaceable habitats

- 3.2.1. Irreplaceable habitats (as defined in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 (HM Government, 2024a)) are treated differently within the statutory framework for BNG. Good practice (CIEEM, CIRIA & IEMA, 2019) recommends that an overall scheme-wide BNG cannot be achieved where irreplaceable habitats are lost, although mandatory net gain requirements will still be applied to the remaining habitats.
- 3.2.2. No irreplaceable habitats were identified on-site.

3.3 On-site Baseline Biodiversity

- 3.3.1. An overview of the baseline biodiversity for the Proposed Development is provided below. The tabs within the accompanying Metric (**Appendix D**) provide quantitative details on the habitat baseline and should be referred to for full details on the habitats present on-site. In this instance, please refer to tabs: A-1 Site Habitat Baseline.
- 3.3.2. A baseline habitat map is provided in **Appendix A, Figure 1**. A summary of baseline habitat units is provided in **Section 3.3.2**.

Area habitats

- 3.3.3. The area covered by area-based habitats measures 5.13ha, excluding trees (5.20ha including trees).
- 3.3.1. Most habitats within the Site were of low ecological value, comprising urban developed land. The habitat with the highest ecological value is the willow scrub, eastern and central to the Site.
- 3.3.2. Baseline habitats are calculated as area-based habitat units (ABHUs) and included:
- 0.396ha condition assessment N/A bramble scrub; equating to 1.58 ABHUs.
 - 0.013ha moderate condition mixed scrub; equating to 0.10 ABHUs.
 - 0.051ha good condition mixed scrub; equating to 0.61 ABHUs.
 - 0.267ha poor condition willow scrub; equating to 1.07 ABHUs.
 - 3.078ha developed land, sealed surface; equating to 0 ABHUs.
 - 0.794ha artificial unvegetated, unsealed surface; equating to 0 ABHUs.
 - 0.291ha poor condition ruderal/ephemeral; equating to 0.58 ABHUs.

- 0.0774ha moderate condition individual urban trees; equating to 0.62 ABHUs.
- 0.177ha poor condition modified grassland; equating to 0.41 ABHUs.
- 0.058ha poor condition other neutral grassland; equating to 0.23 ABHUs.

Hedgerows

- 3.3.3. Two lines of trees (w1g-33) in good condition, measuring a total of 0.0472km in length, equating to 0.33 hedgerow units (HUs), were recorded along the north-western boundary of the site.

Watercourses

- 3.3.4. No watercourses were identified on-site.

3.4 On-site Post-intervention Biodiversity

- 3.4.1. An overview of on-site post-intervention biodiversity for the Proposed Development is provided below, in line with the Biodiversity Gain Hierarchy (Defra, 2024h). The tabs within the accompanying Metrics (see **Appendix D**) provide full quantitative details of on-site habitat retention, enhancement, loss, and creation. In this instance, please refer to tabs: A-1 (columns S-X), A-2.
- 3.4.2. Post-intervention habitat maps are provided in **Appendix A, Figure 2**.

On-site Habitat Retention

- 3.4.3. No on-site baseline area-based habitats are expected to be retained. All existing habitats will be lost, as the site will be fully redeveloped into sealed surfaces to accommodate the proposed Car park.

On-site Habitat Enhancement

- 3.4.4. As a part of the Proposed Development, the total area within the site will be converted into a Car park area, resulting in the complete loss of the habitats.
- 3.4.5. Due to this change, no on-site habitat enhancement is feasible within the footprint of the development.

On-site Habitat Loss

- 3.4.6. A total of 5.20ha of area-based habitats, including trees, equating to 5.21 ABHUs, are anticipated to be lost because of the Proposed Development.
- 3.4.7. The loss of on-site habitats is necessary to maximise parking provision in the Car park areas.

On-site Habitat Creation

- 3.4.8. Due to the nature of the Proposed Development, on-site habitat creation will be made up of developed land; sealed surface (u1b).

3.4.9. In terms of ABHUs provision, on-site habitat creation is anticipated to deliver 0 ABHUs based on the Proposed Development due to the construction of developed land; sealed surface.

Significant On-site Enhancements

3.4.10. Habitat enhancement and creation measures that qualify as ‘significant on-site enhancements’ (Defra, 2024i) need to be legally secured (via planning condition, s106 agreement, or conservation covenant) and subject to a 30-year Habitat Management and Monitoring Plan (HMMP). These will need to be confirmed with the LPA prior to commencement as part of the final BGP.

3.4.11. No on-site habitat creation or enhancement measures qualify as ‘significant on-site enhancements’ under the LCR BNG guidance, as the Proposed Development does not include the enhancement or retention of baseline habitats. The only on-site habitat measure relates to the creation of a u1b habitat parcel, which does not achieve the required 10% net gain, and therefore additional off-site units will be secured to fulfil the BNG requirement.

Summary of On-site Biodiversity Change

3.4.12. The Proposed Development is estimated to result in a **100% net loss for area-based habitats and** hedgerow units.

3.4.13. Headline results for the on-site baseline units, on-site post-intervention units, and on-site net change are shown in **Figure 3-1**. Detailed results per individual habitat type, including habitat trading, can be viewed within the Metric toolkits (see **Appendix D**).

3.4.14. The on-site shortfall is proposed to be compensated through the purchase of units from a local habitat bank.

Figure 3-1 - On-site Headline Results

On-site baseline	Area habitat units	5.21		
	Hedgerow units	0.33		
	Watercourse units	0.00		
On-site post-intervention (including habitat retention, creation & enhancement)	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site net change (units & percentage)	Area habitat units	-5.21	-100.00%	On-site net gain is less than target set
	Hedgerow units	-0.33	-100.00%	On-site net gain is less than target set
	Watercourse units	0.00	0.00%	

Trading Rules

3.4.15. Based on the on-site design, the Metric trading rules have not been met for all habitats.

3.4.16. Habitat types for which trading rules have not been met on-site include:

- Medium distinctiveness other neutral grassland, equating to 0.23 ABHUs.
- Medium distinctiveness bramble scrub, equating to 1.58 ABHUs.
- Medium distinctiveness mixed scrub, equating to 0.72 ABHUs.
- Medium distinctiveness willow scrub, equating to 1.07 ABHUs.

- Medium distinctiveness individual trees, equating to 0.62 ABHUs.
- Low distinctiveness ruderal/ephemeral, equating to 0.58 ABHUs.
- Low distinctiveness modified grassland, equating to 0.41 ABHUs.
- Low distinctiveness line of trees, equating to 0.33 ABHUs.

3.5 Off-site Biodiversity

- 3.5.1. This section provides a summary estimate of the number and type of off-site units needed to achieve 10% BNG based on assumptions described in **Section 2.9**.
- 3.5.2. Other options following the Biodiversity Gain Hierarchy have been considered as far as possible, and opportunities have been identified for the Proposed Development to contribute to strategic delivery of biodiversity recovery within the wider landscape.
- 3.5.3. To achieve 10% BNG on or off site, the following units will be required as shown in **Figure 3-2**.

Figure 3-2 Units Required to Achieve 10% BNG

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
<i>Area habitat units</i>	10.00%	5.21	5.73	5.73	
<i>Hedgerow units</i>	10.00%	0.33	0.36	0.36	
<i>Watercourse units</i>	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

3.6 Statutory Biodiversity Credits

- 3.6.1. Statutory biodiversity credits will only be considered as a last resort once all other options under the Biodiversity Gain Hierarchy have been exhausted.

4 Recommendations and Next Steps

- 4.1.1. The following recommendations apply to the Proposed Development to meet national and local policy and legislative requirements, as well as BNG good practice:
1. All feasible on-site options for habitat retention, enhancement and creation have been explored in accordance with the Biodiversity Gain Hierarchy.
 2. Given that on-site delivery of the mandatory 10% net gain is not feasible owing to total habitat loss, it is recommended that the required biodiversity units be obtained through the purchase of off-site units from an approved habitat bank.
 3. Discussions with off-site providers will continue to take place throughout the planning application determination period and will be finalised prior to submission of the final Biodiversity Gain Plan (BGP).
 4. A final BGP will be prepared and submitted post-determination to discharge the general biodiversity gain condition prior to commencement.
 5. Good Practice Principles will continue to be followed, including collaboration with key stakeholders throughout the planning process and ensuring ongoing alignment with other assessments and management plans required for the Proposed Development.

5 References

- Arcadis, May 2016. *Ecological Feasibility Assessment*, s.l.: Trailer Park, Eastlands. 014-UA008628- UE21-02-F..
- British Standards Institute, 2021. *BS 8683:2021 Process for designing and implementing Biodiversity Net Gain. Specification*, UK: BSI: Available at: <https://knowledge.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification?version=standard>.
- CIEEM, CIRIA & IEMA, 2016. *Biodiversity Net Gain: Good practice principles for development*. [Online]
Available at: <https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/>
- CIEEM, CIRIA & IEMA, 2019. *Biodiversity Net Gain: Good practice principles for development – A practical guide*. [Online]
Available at: <https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development-a-practical-guide/>
- CIEEM, 2021. *Biodiversity Net Gain Report and Audit Templates*. Chartered Institute of Ecology and Environmental Management, Winchester, UK.: Available at: <https://cieem.net/wp-content/uploads/2021/07/CIEEM-BNG-Report-and-Audit-templates2.pdf>.
- Defra, 2023a. *Environment Improvement Plan*. [Online]
Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan>
- Defra, 2024a. *Guidance – Understanding biodiversity net gain*. [Online]
Available at: <https://www.gov.uk/guidance/understanding-biodiversity-net-gain>
- Defra, 2024b. *Guidance - Biodiversity net gain (Paragraph: 008 Reference ID: 74-008-20240214)*. [Online]
Available at: <https://www.gov.uk/guidance/biodiversity-net-gain>
- Defra, 2024c. *Guidance – Statutory biodiversity metric tools and guides*. [Online]
Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides?fbclid=IwAR3t_S8djN97HZzsb8H9ISdfVqDiUZJcSR7pp4Kz5zHRFK5KWoljPBImRcw
- Defra, 2024d. *Guidance – Calculate biodiversity value with the statutory biodiversity metric*. [Online]
Available at: <https://www.gov.uk/guidance/biodiversity-metric-calculate-the-biodiversity-net-gain-of-a-project-or-development#the-small-sites-metric>

- Defra, 2024e. *Guidance – Biodiversity Net Gain (Paragraph: 042 Reference ID: 74-042-20240214)*. [Online]
Available at: <https://www.gov.uk/guidance/biodiversity-net-gain#para42>
- Defra, 2024f. *Guidance – What you can count towards a development's biodiversity net gain*. [Online]
Available at: <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng>
- Defra, 2024g. *Collection; Biodiversity Net Gain*. [Online]
Available at: <https://www.gov.uk/government/collections/biodiversity-net-gain>
- Defra, 2024h. *Guidance – Biodiversity Net Gain*. [Online]
Available at: <https://www.gov.uk/guidance/biodiversity-net-gain>
- Defra, 2024i. *Make on-site biodiversity gains as a developer*. [Online]
Available at: <https://www.gov.uk/guidance/make-on-site-biodiversity-gains-as-a-developer#significant-on-site-enhancements>
- Defra, 2026. *Open consultation - Biodiversity net gain for nationally significant infrastructure projects*. [Online]
Available at: <https://www.gov.uk/government/consultations/biodiversity-net-gain-for-nationally-significant-infrastructure-projects>
[Accessed 13 06 2025].
- Department of Transport, 2024. *National Networks National Policy Statement*. [Online]
Available at: <https://www.gov.uk/government/publications/national-networks-national-policy-statement>
- Guidance Note on Mandatory Biodiversity Net Gain and its Implementation in the Liverpool City Region, 2025. *LCR Mandatory Guidance Note*. [Online]
Available at: https://eas.merseysidebiobank.org.uk/wp-content/uploads/2025/06/LCR_Mandatory_BNG_Guidance_Note2025.pdf
- HM Government, 1990. *Town and Country Planning Act 1990*. [Online]
Available at: <https://www.legislation.gov.uk/ukpga/1990/8/schedule/7A>
- HM Government, 2006. *Natural Environment and Rural Communities Act 2006*. [Online]
Available at: <https://www.legislation.gov.uk/ukpga/2006/16/contents>
- HM Government, 2021a. *Environment Act 2021 Schedule 14*. [Online]
Available at: <https://www.legislation.gov.uk/ukpga/2021/30/schedule/14/enacted>
- HM Government, 2023a. *The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024*. [Online]
Available at: <https://www.legislation.gov.uk/ukdsi/2024/9780348254358>

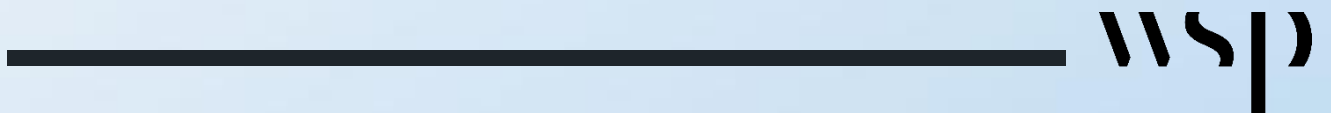
- HM Government, 2024a. *UK Statutory Instruments 2024 No.48 - The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024*. [Online]
Available at: <https://www.legislation.gov.uk/uksi/2024/48/contents/made>
- HM Government, 2024b. *The Biodiversity Gain Requirements (Exemptions) Regulations 2024*. [Online]
Available at: <https://www.legislation.gov.uk/uksi/2024/47/contents/made>
- HM Government, 2024c. *Understanding Biodiversity Net Gain Guidance. 'What can count towards a development's biodiversity net gain..* [Online]
Available at: [What you can count towards a development's biodiversity net gain - GOV.UK \(https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng\)](https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng)
- HM Government, 2024d. *The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024*. [Online]
Available at: <https://www.legislation.gov.uk/uksi/2024/50/contents/made>
- HM Government, 2024e. *The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024*. [Online]
Available at: <https://www.legislation.gov.uk/ukdsi/2024/9780348254419>
- HM Government, 2024f. *The Biodiversity Gain Site Register Regulations 2024*. [Online]
Available at: <https://www.legislation.gov.uk/uksi/2024/45/contents/made>
- HM Government, 2024g. *National Planning Policy Framework*. [Online]
Available at: <https://www.gov.uk/guidance/national-planning-policy-framework>
- Knowsley Local Plan Core Strategy, 2016. *Knowsley Local Plan*. [Online]
Available at: <https://digital-land.github.io/local-plan-extractor/local-plan/20c91e28bbe2f93b1b022a7e351eeb86d917fc9c572a95501e68269e902a921a.html>
- Liverpool City Region, 2025. *BNG Guidance Note*. [Online]
Available at: https://eas.merseysidebiobank.org.uk/wp-content/uploads/2025/06/LCR_Mandatory_BNG_Guidance_Note2025.pdf
- Liverpool City Region, 2025. *Local Nature Recovery Strategy*. [Online]
Available at: <https://www.liverpoolcityregion-ca.gov.uk/local-nature-recovery-strategy>
- Liverpool Local Plan, 2013-2033. [Online]
Available at: <https://liverpool.gov.uk/planning-and-building-control/plan-making-in-liverpool/the-liverpool-local-plan-2013-2033/>
- Natural England, 2024. *Habitat Management and Monitoring Plan Template (JP058)*. [Online]
Available at: <https://publications.naturalengland.org.uk/publication/5813530037846016>
- Saved Policies of the Unitary Development Plan (adopted June 2006), 2006. *Saved Policies of the Unitary Development Plan (adopted June 2006)*. [Online]

Available at: <https://www.salford.gov.uk/planning-building-and-regeneration/planning-policies/local-planning-policy/salfords-development-plan/salford-local-plan/part-one-salford-local-plan/publication-local-plan-chapters/annex-d-saved-unitary-development-plan-policies/>

- UKHab, 2023. *UK Habitat Classification Documents V2.01*. [Online]
Available at: <https://ukhab.org/ukhab-documentation/>
- WSP, 2026. *Jaguar Land Rover, Eastland Car Park Preliminary Ecological Appraisal*, Liverpool: WSP.

Appendix A

Baseline and Post-intervention Habitat Maps

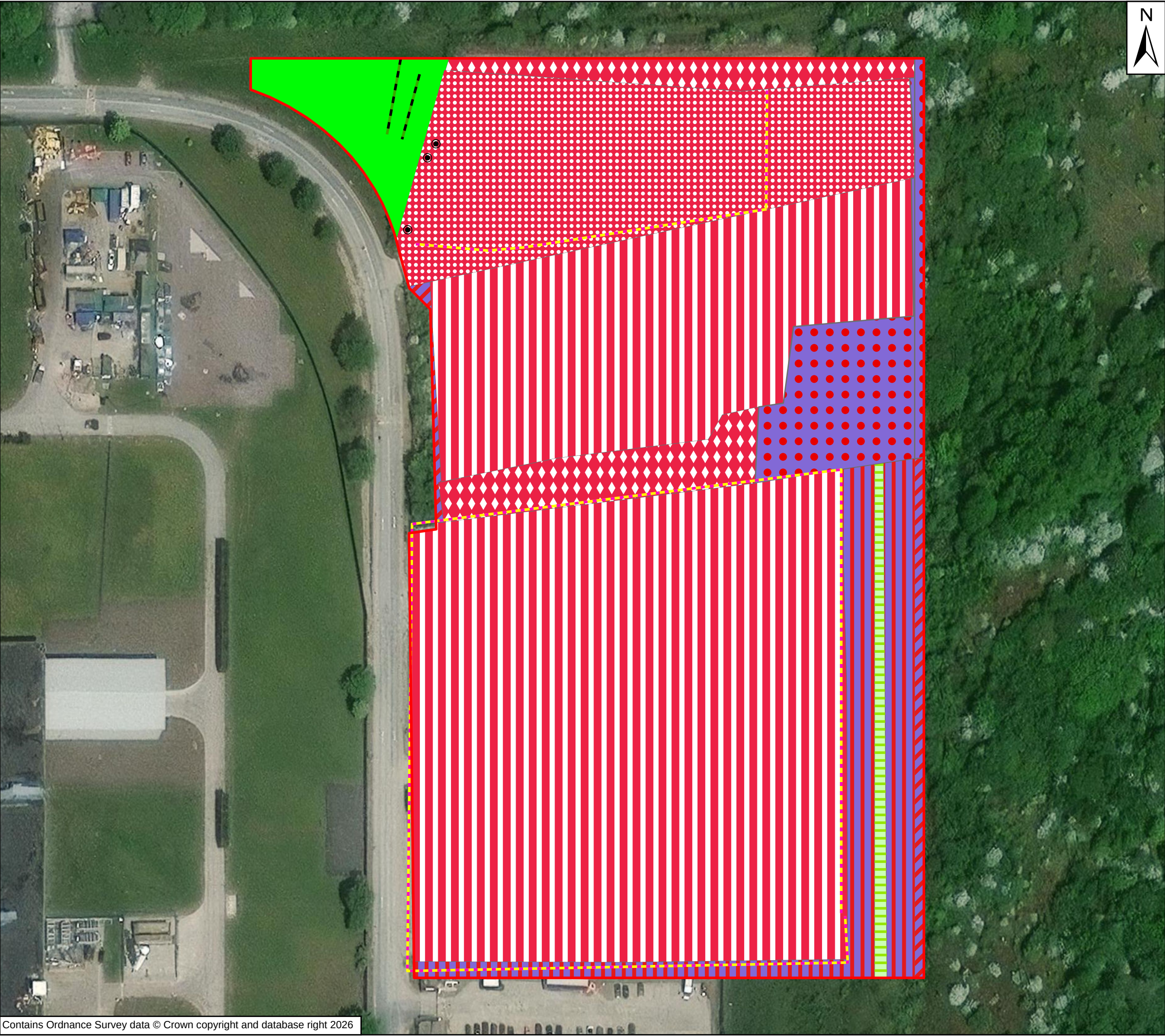




Appendix A – Baseline & Post-Intervention Habitat Maps

Appendix A – Figure 1 – Baseline Habitat Survey Results

Appendix A – Figure 2 – Post-Development Habitat Survey Results

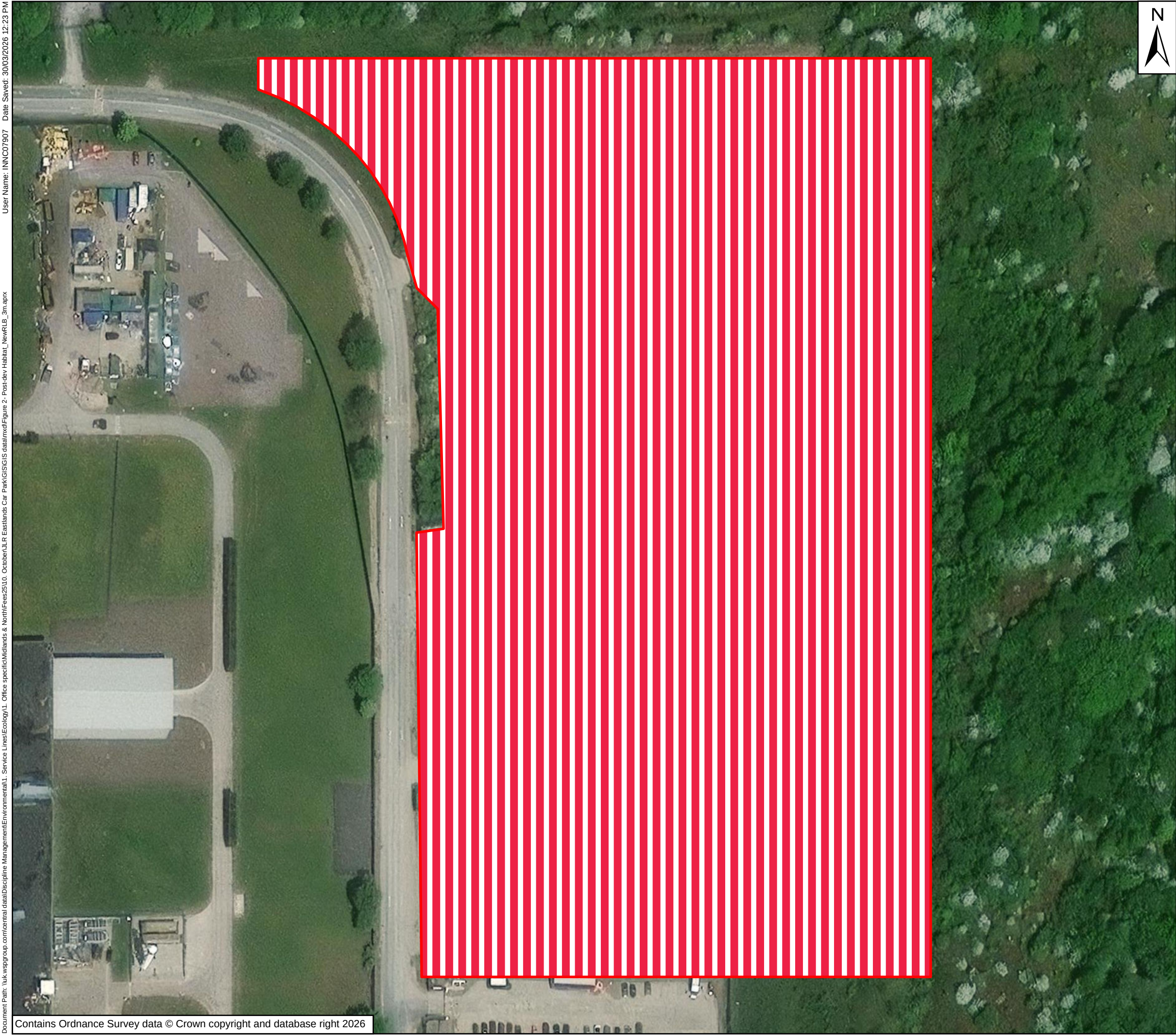


- Key**
- Red Line Boundary
 - Habitat Classification**
 - g3c - other neutral grassland
 - g4 - modified grassland
 - h3d - bramble scrub
 - h3h - mixed scrub
 - h3j - willow scrub
 - u1b - developed land, sealed surface
 - u1c - artificial unvegetated unsealed surface
 - u1f - sparsely vegetated urban land
 - u1e - built linear features
 - w1g-33 - line of trees
 - Urban Trees

0 20 40
Metres



Client:	JLR		
Project:	JLR Halewood		
Title	Baseline Habitat Survey Results		
Drawing No:	Figure 1	Drawn:	NC
Date:	30/03/2026	Checked:	DF
Scale:	1:1,200	Approved:	RB



Key
 Red Line Boundary
Habitat Classification
 u1b - developed land, sealed surface

02040

Metres



Client:

Jaguar Land Rover

Project:

JLR Halewood

Title

Post- development Habitat Survey Results

Drawing No: Figure 2

Date: 30/03/2026

Scale: 1:1,200

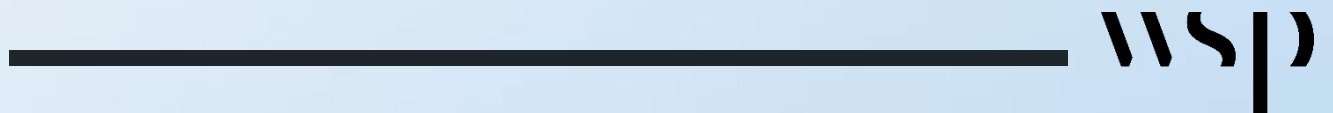
Drawn: NC

Checked: DF

Approved: RB

Appendix B

BNG Legislation & Policy



Appendix B – BNG Legislation and Policy

National legislation

England

Environment Act 2021

BNG is mandatory under Schedule 7a of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). This means that most major developments (with exemptions) must deliver a minimum net gain of 10% for biodiversity as a condition of planning permission, measured using the Statutory Biodiversity Metric. There are six statutory instruments that work together to deliver the BNG framework, including:

- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2023 (HM Government, 2024e);
- The Biodiversity Gain Sites Register (Financial Penalties and Fees) Regulations 2023 (HM Government, 2023a);
- The Biodiversity Gain Site Register Regulations 2024 (HM Government, 2024f) ;
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b);
- The Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024 (HM Government, 2024a); and
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 (HM Government, 2024d).

Under mandatory BNG, the Biodiversity Gain Hierarchy must be considered by LPAs when determining whether to approve a Biodiversity Gain Plan. Here, efforts must be made to first avoid then minimise adverse impacts in relation to on-site medium, high and very high distinctiveness habitats. Secondly, any adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits. All significant on-site gains and all off-site gains from a development must be legally secured, managed and maintained for a period of 30 years.

Mandatory BNG does not replace existing legislation and protections for sites, habitats, and species.

The Environment Act 2021 also amended the Natural Environment and Rural Communities (NERC) Act 2006 (HM Government, 2006). This amendment extended the duty of public authorities (the 'Biodiversity Duty') beyond the original NERC Act, which referred only to

conservation, so that it included the enhancement of biodiversity in England. Further description of the NERC Act is provided below.

All government policy and guidance are collated under the Biodiversity Net Gain Collection (Defra, 2024g).

UK Government's Environmental Improvement Plan

Biodiversity Net Gain is a key cross-cutting theme to deliver the environmental targets and commitments set out in the Government's Environmental Improvement Plan (Defra, 2023a).

National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) (HM Government, 2024g) refers to conserving and enhancing the natural environment. This requires Local Authorities in England to take measures to:

- Conserve and enhance biodiversity;
- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks within plans;
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks, and priority species within plans, in addition to securing measurable net gains for biodiversity; and
- Refuse planning permission for development if significant harm resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.

The revised NPPF refers to biodiversity and environmental net gains in the following paragraphs:

- Transport Infrastructure:
 - Paragraph 109. *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
 - d) the environmental impacts of traffic and transport infrastructure can be identified assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for **net environmental gains**."*
- Planning decisions
 - Paragraph 125. *"Planning policies and decisions should a) encourage multiple benefits from both urban and rural land ... and taking opportunities to **achieve net environmental gains - such as developments that would enable new habitat creation or improve public access to the countryside**."*
 - Paragraph 187. *"Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and **providing net***

***gains** for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.”*

- Paragraph 192. *“To protect and enhance biodiversity and geodiversity plans should b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing **measurable net gains for biodiversity**.”*
- Paragraph 193. *“When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; ... and d) ... “ development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can **secure measurable net gains for biodiversity** or enhance public access to nature where this is appropriate”.*

Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities (NERC) Act (HM Government, 2006) requires public bodies, including local authorities, ‘to have regard to the conservation of biodiversity in England when carrying out their normal functions’.

Section 40 sets out the ‘Duty to Conserve and Enhance Biodiversity’, and states that:

- Paragraph 1. *“A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.”* The general biodiversity objective is the “conservation and enhancement of biodiversity in England.”

Section 41 sets out that:

- Paragraph 1. *“The Secretary of State must... publish a list of the living organisms and types of habitat ... of principal importance for the purpose of conserving biodiversity”* based on consultation with Natural England; and that
- Paragraph 3a. The Secretary of State must *“a) take such steps... to further the conservation of the living organisms and types of habitat included in any list published under this section, or (b) promote the taking by others of such steps”.*

Local Nature Conservation Policy

Knowsley Council Local Plan: Core Strategy

The current local planning policy context is incorporated within the Knowsley Council Plan, 2016-2028.

Policy CS8: Green Infrastructure

Maintenance and Enhancement of Knowsley's Existing Green Infrastructure

- 1) Knowsley's existing Green Infrastructure and its beneficial functions will be protected, managed and/or enhanced, primarily to:
 - a) Ensure more attractive and cleaner residential neighbourhoods;
 - b) Sustain and promote biodiversity (including designated sites, priority habitats and protected and endangered species) in accordance with importance and contribution to ecological networks;
 - c) Preserve the character and function of historic environments and valued landscapes;
 - d) Mitigate the effects of climate change and flood risk;
 - e) Mitigate air, water and noise pollution;
 - f) Provide local opportunities for sport, recreation and allotments; and
 - g) Provide sustainable transport linkages between residential neighbourhoods and easy access to employment and services.
- 2) To achieve the above, planning powers and other interventions will be used to:
 - a) Protect and enhance strategically important areas of greenspace;
 - b) Ensure an appropriate quantity and improved quality of locally important open spaces, including outdoor sports provision (and ancillary facilities of appropriate scale);
 - c) Promote effective movement of wildlife through a network of strategic green links, by protecting, maintaining and improving existing and new open spaces, water courses (including water quality) and biodiversity assets;
 - d) Protect, enhance and/or introduce biodiversity into existing areas of Green Infrastructure, through integration into the design of new development and public realm projects;
 - e) Improve accessibility for communities to greenspace offering leisure and recreation opportunities;
 - f) Protect and where possible improve green paths and cycleways linking residential areas, existing strategic areas of greenspace, employment locations, local community services and leisure facilities;

- g) Work in partnership with other districts and relevant bodies at a landscape scale to minimise the impact of development upon Knowsley's existing Page 82 Knowsley Local Plan: Core Strategy January 2016 biodiversity and geological assets, and sustain the protection afforded to internationally important sites, including supporting habitat, for biodiversity outside of the borough; and
 - h) Deliver new integrated and functional Green Infrastructure that helps to mitigate and adapt to climate change, such as sustainable drainage systems, carbon capture and storage, soft landscaping and green roofs.
- 3) Site allocations for greenspace will be identified in the Local Plan: Site Allocations and Development Policies document, with further guidance set out in the Developer Contributions Supplementary Planning Document or future Supplementary Planning Document as appropriate.

Strategic Green Links

- 4) Knowsley's strategically important green links are:
- a) Alt Corridor (Huyton) – stretching from Huyton Village through South Alt Park, Alt Park, Alt Meadows and into Stockbridge Village;
 - b) Valley Corridor (Kirkby) – stretching through Valley Meadow, St. Chad's Park, Millbrook Park, Millennium Green and Mill Dam;
 - c) Whiston to Cronton Corridor – stretching through Cronton, Stadt Moers Park and Whiston Greenway;
 - d) Halewood Triangle – Halewood Park linkage with the Trans-Pennine Trail and to the national cycle network;
 - e) M57 Green Belt Corridor; and
 - f) Knowsley Hall Estate – including Knowsley Safari Park and Local Wildlife Sites.

Green Infrastructure within the Liverpool City Region

- 5) Knowsley Council will work with partners to help deliver local and sub-regional programmes, initiatives and strategies to enhance Green Infrastructure.

Approach to Green Infrastructure and New Development

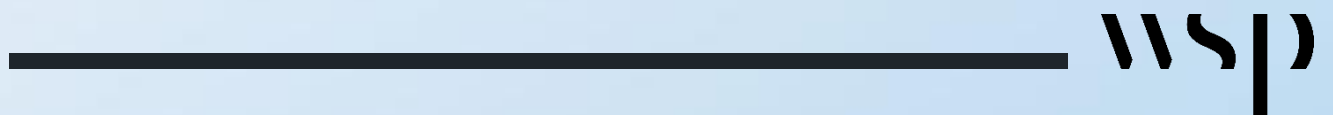
- 6) New development must be served by Green Infrastructure to meet the needs of residents and the local environment, in a manner which will:
- a) Contribute to the creation of a high-quality residential environment;
 - b) Provide access to high quality open space for leisure and recreational purposes;
 - c) Seek to protect, maintain and where possible enhance biodiversity within and around new developments according to their designation and significance to provide space for nature; and



- d) Provide adequate mitigation and/or, as a last resort, compensation for Green Infrastructure or biodiversity loss, in circumstances where harm resulting from the development is otherwise unavoidable.

Appendix C

**BNG Good Practice Principles
(CIEEM, IEMA & CIRIA, 2016)**



Appendix C – BNG Good Practice Principles (CIEEM, IEMA & CIRIA, 2016)

Principle	Description	Evidence
1. Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.	See Section 3 for details on how the Biodiversity Gain Hierarchy has been applied.
2. Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.	See Section 3.2 for details relating to avoidance of irreplaceable habitats.
3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring, and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.	The benefits in terms of biodiversity, as well as ecosystem services will be available to the main stakeholders – the employees/residents/users of facilities, as well as the public in adjacent areas. The BNG outcome is to be shared with relevant stakeholders through the planning process. Stakeholders will be able to review results and provide comments and queries as part of this process.

Principle	Description	Evidence
4. Address risks	Mitigate difficulty, uncertainty, and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.	The Statutory Biodiversity Metric accounts for delivery risk, temporal risk, and spatial risk in the unit calculation (see Section 2 and Appendix D for the Metric toolkit).
5. Make a measurable Net Gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.	The Statutory Biodiversity Metric has been applied to quantify changes in biodiversity value.
6. Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when: ■ Delivering compensation that is ecologically equivalent in type, amount, and condition, and that accounts for the location and timing of biodiversity losses; ■ Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation;	Although the Proposed Development cannot meet the trading rules of the statutory Biodiversity Metric on-site due to the entire area being converted to hardstanding, off-site providers within the local area will be prioritised to deliver the required biodiversity units. This approach ensures that net gain is achieved as locally as possible, supporting more strategic habitat creation and enhancing ecological connectivity across the surrounding landscape to achieve the best possible outcome for biodiversity (see Section 3/Appendix D), apply the Biodiversity Gain Hierarchy (see Section 3), and incorporate local strategic objectives for nature (see Section 2.5.1).

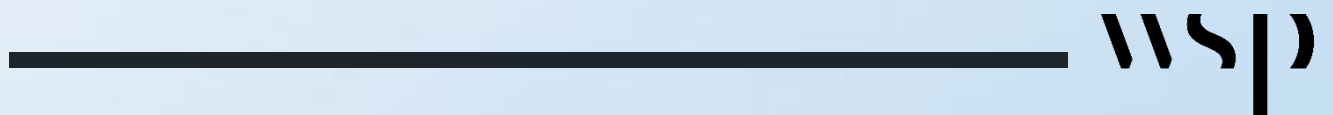
Principle	Description	Evidence
	■ Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional, and national levels; ■ Enhancing existing or creating new habitat; ■ Enhancing ecological connectivity by creating more bigger, better, and joined areas for biodiversity.	
7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e., do not deliver something that would occur anyway).	See Section 2.7 (Additionality).

Principle	Description	Evidence
8. Create a Net Gain legacy	Ensure Net Gain generates long-term benefits by: - Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity; - Planning for adaptive management and securing dedicated funding for long-term management; - Designing Net Gain for biodiversity to be resilient to external factors, especially climate change; - Mitigating risks from other land uses; - Avoiding displacing harmful activities from one location to another; - Supporting local-level management of Net Gain activities.	On-site habitat creation and enhancement do not qualify as significant under LCR BNG guidance, as no baseline habitats are being enhanced or retained. The only on-site habitat measure is the creation of a u1b parcel and does not meet the required 10% net gain. As a result, additional off-site biodiversity units will be secured. Engagement with off-site providers is ongoing and will be finalised ahead of submitting the final Biodiversity Gain Plan.
9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	Due to the nature of the Proposed Development, which involves converting the entire site to hardstanding, opportunities for onsite habitat enhancement were inherently limited. While BNG could not meaningfully influence onsite design, it will instead guide the delivery of offsite habitat creation. Offsite measures will provide the required 10% net gain through an established habitat bank, supporting strategic habitat creation within the local area and contributing

Principle	Description	Evidence
		to wider landscape-scale biodiversity benefits.
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	The BNG outcome is to be shared with relevant stakeholders through delivery of the Proposed Development via the local authority planning portal.

Appendix D

Statutory Biodiversity Metric & Supplementary Files





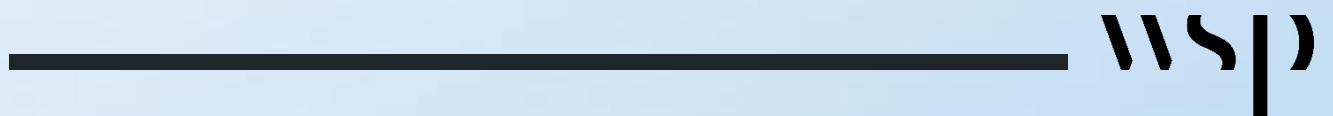
Appendix D – Statutory Biodiversity Metric & Supplementary Files

A completed Statutory Biodiversity Metric Excel toolkit has been provided alongside this report. Please see the following file saved [here](#):

- The_Statutory_Metric_Macro_Enabled_1.0.4_issue

Appendix E

Habitat & Hedgerow Condition Assessment Summary



Appendix E – Condition Assessment Summary

Table E-1 provides a summary of baseline condition assessment results for area habitats and hedgerows. Full, detailed condition assessment results can be found in **Appendix D**.

Table E-1 – Condition Assessment Summary for Area Habitats and Hedgerows

Habitat reference or location	Condition sheets	Total number of condition sheets used, or habitat parcels	Number of parcels of each condition achieved					Notes
			Good	Fairly Good	Moderate	Fairly Poor	Poor	
JLR Eastland Car Park	Heathland and scrub-Bramble scrub (h3d)						0.396ha	Bramble scrub <i>Rubus fruticosus</i> (D) was present on the eastern boundary to the south of the Site.
JLR Eastland Car Park	Heathland and scrub-Mixed Scrub (h3h)		0.051ha		0.013ha			This habitat was present along the western boundary of the Site and along the slopes of the vegetated earth embankment forming the southeast boundary. It consisted of a thin strip bordering u1b habitat. Species present included hawthorn <i>Crataegus monogyna</i> (F), alder <i>Alnus glutinosa</i> (O), goat willow

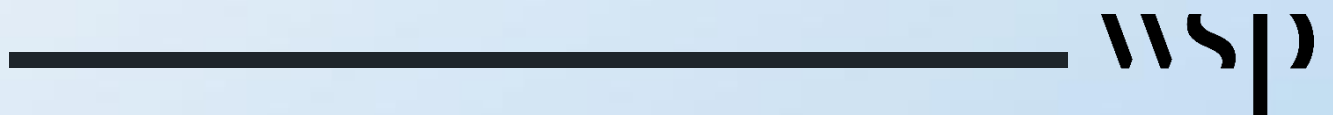
Habitat reference or location	Condition sheets	Total number of condition sheets used, or habitat parcels	Number of parcels of each condition achieved					Notes
			Good	Fairly Good	Moderate	Fairly Poor	Poor	
								<i>Salix caprea</i> (F), bramble (F) and rosebay willowherb <i>Chamerion angustifolium</i> (O).
JLR Eastland Car Park	Heathland and scrub-Willow scrub (h3j)						0.267ha	This habitat was present on the upper eastern boundary of the Site. The habitat was dominated by goat willow, which had succeeded over recent years on piles of earth. Very limited ground flora consisting of bryophytes.
JLR Eastland Car Park	Grassland-modified grassland (g4)						0.177	This habitat was present on the upper north-west boundary of the Site. The habitat was dominated by Cock foot <i>Dactylis glomerata</i> , Creeping buttercup <i>Ranunculus repens</i> , Perennial ryegrass <i>Lolium perenne</i> , Plantain <i>Plantago lanceolata</i> , Burnet

Habitat reference or location	Condition sheets	Total number of condition sheets used, or habitat parcels	Number of parcels of each condition achieved					Notes
			Good	Fairly Good	Moderate	Fairly Poor	Poor	
								saxifrage <i>Pimpinella saxifraga</i> and Yorkshire fog <i>Holcus lanatus</i> .
JLR Eastland Car Park	Grassland-other neutral grassland (g3c)						0.058ha	This habitat was present as a narrow area in the middle of the bramble scrub, atop a vegetated embankment.
JLR Eastland Car Park	Urban-Developed land; sealed surface (u1b)						3.07ha	This habitat was present centrally and to the south of the Site.
JLR Eastland Car Park	Urban-Artificial unvegetated; unsealed surface (u1c)						0.794ha	This habitat was present at the north of the Site. Species present included bramble, creeping thistle <i>Cirsium arvense</i> , annual meadow grass <i>Poa annua</i> , and common nettle <i>Urtica dioica</i> .

Habitat reference or location	Condition sheets	Total number of condition sheets used, or habitat parcels	Number of parcels of each condition achieved					Notes
			Good	Fairly Good	Moderate	Fairly Poor	Poor	
JLR Eastland Car Park	Urban-Ruderal/Ephemeral (u1f)						0.29ha	This habitat was present as an earth/stone bund that had become vegetated, central to the Site. Species present included alder, bramble, goat willow, rosebay willowherb, annual meadow grass, bulrush <i>Typha latifolia</i> , soft rush <i>Juncus effusus</i> and common reed <i>Phragmites australis</i> .

Appendix F

Post-development habitat translation





Appendix F – Post-development habitat translation

Table F-1 summarises baseline condition assessment results for area habitats and hedgerows. Full, detailed condition assessment results can be found in **Appendix D**.

Table F-1– Translation of post-development habitats

Landscape Classification	Metric habitat type	Metric habitat justification	Target condition	Condition justification
Car park	Urban-Developed land; sealed surface (u1b)	The proposed Car park consists entirely of artificial, impermeable hardstanding created for vehicle storage.	N/A	All baseline habitats, whether modified grassland, scrub, or other semi-natural types, are replaced by u1b, which holds no biodiversity value.



8 1st Floor Station House
Tithebarn Street, Exchange Station
Liverpool
L2 2QP

wsp.com

WSP UK Limited makes no warranties or guarantees, actual or implied, in relation to this report, or the ultimate commercial, technical, economic, or financial effect on the project to which it relates, and bears no responsibility or liability related to its use other than as set out in the contract under which it was supplied.