



## Report Verification and Declaration of Compliance

This report has been prepared with reference to best practice guidelines for Ecological Impact Assessment in the UK and Ireland, as defined by CIEEM (2018) and is provided in accordance with the provisions of British Standard 42020:2013 Biodiversity: Code of practice for planning and development.

| Document Control |            |                                                           |                                                       |                                                      |
|------------------|------------|-----------------------------------------------------------|-------------------------------------------------------|------------------------------------------------------|
| Project Name:    |            | Priory Farm Solar Array- Discharge of Planning Conditions |                                                       |                                                      |
| Project Number:  |            | AxisL-043-003724                                          |                                                       |                                                      |
| Report Title     |            | Biodiversity Net Gain Plan Report                         |                                                       |                                                      |
|                  |            |                                                           |                                                       |                                                      |
| Issue            | Date       | Notes                                                     | Prepared                                              | Reviewed                                             |
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|                  |            |                                                           |                                                       |                                                      |

This report has been prepared in accordance with the terms and conditions of appointment [on request]. Avian Ecology Ltd. (6839201) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

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## ANNEXES

**ANNEX 1: BIODIVERSITY NET GAIN METRIC WITH POPULATED OFFSITE HABITAT  
UNITS PROVIDED BY WILD CAPITAL (SEPARATE DOCUMENT)**

**ANNEX 2: BIODIVERSITY NET GAIN PLAN (SEPARATE DOCUMENT)**

# 1. INTRODUCTION

## 1.1 Background and Scope

- 1.1.1 This report has been prepared by Avian Ecology Ltd. on behalf of AGR Solar 4 Ltd. It provides the necessary information required to discharge the biodiversity net gain condition attached to North Herts Council planning reference 24/02333/FP.
- 1.1.2 This is in relation to the proposed alternative cable route for Priory Farm Solar Array ('the Proposed Development') on land in and around Little Wymondley, Stevenage at central grid reference TL 2121 2744.
- 1.1.3 The Proposed Development is shown on the following Site plans: 3656-01-001 Rev A, 3656-01-002a Rev B, 3656-01-002b Rev B, 3656-01-002c Rev B, 3656-01-003a Rev B, 3656-01-003b Rev B, 3656-01-003c Rev B and 3656-01-004.
- 1.1.4 Detailed background information relating to the proposals is provided within the Ecological Assessment Report (EAR)<sup>1</sup>.

## 1.2 Legislative and Planning Framework

- 1.2.1 Relevant legislation and planning policy is outlined in full within the Scheme EAR; the below legislation and policies considered pertinent to the Biodiversity Net Gain (BNG) Assessment and have been considered when undertaking this assessment:

**Table 1.1: Summary of Relevant Legislation, Policy and Guidance**

| Legislation/ Policy                                                        | Summary                                                                                                                                                                                                      |
|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Environment Act 2021 <sup>2</sup>                                          | Requires 10% net gain for most developments validated after 12 <sup>th</sup> February 2024.                                                                                                                  |
| National Planning Policy Framework (2025) <sup>3</sup>                     | Requires all developments to achieve a net gain for biodiversity.                                                                                                                                            |
| North Herts Local Plan 2011-2031 <sup>4</sup>                              | Requires all relevant new developments to provide a minimum 10% biodiversity net gain.                                                                                                                       |
| BS 42020:2013 Biodiversity – Code of Practice for Planning and Development | Gives recommendations and provides guidance primarily for ensuring that actions and decisions taken at each stage of the planning process are informed by sufficient and appropriate ecological information. |
| BS 8683 - Process for designing and implementing biodiversity net gain     | Specifies a process to design, implement, maintain and monitor BNG outcomes from a development project.                                                                                                      |

<sup>1</sup> Priory Farm Solar Array Alternative Cable Route Ecological Assessment Report 2024, Avian Ecology Ltd.

<sup>2</sup> Legislation.gov.uk (2021) Environment Act 2021 (Online) Available at:

<https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted> (Accessed February 2025)

<sup>3</sup><https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>4</sup> <https://www.north-herts.gov.uk/sites/default/files/2022-12/North%20Hertfordshire%20Local%20Plan%202011-2031.pdf>

| Legislation/ Policy                                                                         | Summary                                                                                                                                          |
|---------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| Biodiversity Net Gain: Good practice principles for development (CIEEM, 2016 <sup>5</sup> ) | Ten good practice principles to provide a framework for achieving biodiversity net gain and to demonstrate that projects followed good practice. |

## 2 METHODOLOGY

### 2.1 Biodiversity Net Gain Assessment

- 2.1.1 A BNG Assessment was undertaken using the Defra Statutory Metric<sup>6</sup> ('the Metric'). The Metric provides a way of measuring and accounting for changes in the biodiversity value of a site by using habitats as a proxy for biodiversity.
- 2.1.2 The BNG Assessment was undertaken by A. Littlechild *BSc (Hons)*, a suitably qualified ecologist with experience utilising biodiversity metrics.
- 2.1.3 The Metric takes into account a range of factors when calculating the value of a habitat (measured as biodiversity units), including the habitats area (measured in hectares), its distinctiveness (its intrinsic value and rarity), condition (the quality of the habitat being assessed), and strategic significance (how ecologically valuable is the location). The distinctiveness of a habitat is pre-set within the Metric and cannot be changed.
- 2.1.4 Habitat conditions for the baseline habitats have assessed in accordance with the relevant habitat condition criteria for the specific habitat type contained within the Metric Technical Supplement<sup>7</sup>. Habitat areas were calculated using GIS software.
- 2.1.5 The strategic significance was determined in line with the North Herts Local Plan (NHLP), in lieu of a formal Local Nature Recovery Strategy (LNRS) being adopted (still in draft form as of August 2025). Professional judgement was used where it was considered the habitat provided additional ecological functions (e.g., acting as a stepping stone between other blocks of similar habitat).
- 2.1.6 Where an area or habitat is specifically covered by a local planning policy or management plan, the strategic significance has been categorised as 'high'. If a habitat has functional value but is not formally recognised in local policy, the strategic significance has been categorised as 'medium'. Where the habitat does not fall under any local policies, and has limited functional value, the strategic significance has been categorised as 'low'.
- 2.1.7 Hedgerows and watercourses are accounted for separately in the Metric as these are linear habitats and therefore are measured in kilometres. Units are not directly interchangeable between area-based habitats and linear habitats, such as hedgerows or rivers.

<sup>5</sup> CIEEM (2016). Biodiversity Net Gain: Good practice principles for development. CIEEM, Winchester.

<sup>6</sup> <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

<sup>7</sup> <http://publications.naturalengland.org.uk/publication/6049804846366720>

- 2.1.8 Additionally, watercourse baseline features require a separate Modular River Physical (MoRPh) condition assessment, to be undertaken by a suitably qualified ecologist. Full results and methodologies for this survey are detailed within the EAR.

### ***Limitations***

- 2.1.9 It should be noted that the Metric uses habitats as a proxy for biodiversity and calculates only the relative biodiversity value of a site, and therefore cannot quantify impacts absolutely. The Metric accounts only for direct impacts to habitats, and as such cannot fully quantify all negative or positive impacts resulting from a development.

## **3 BASELINE CONDITIONS**

### **3.1 Overview of Baseline Habitats**

- 3.1.1 Habitats are summarised here where it provides relevant context to the BNG Assessment.
- 3.1.2 The alternative cable route is a long, linear Site, in two sections running roughly north east and south west of Stevenage Road.
- 3.1.3 The Site comprises small areas of broadleaved plantation woodland, mixed scrub, open mosaic habitat, modified grassland, lowland meadow, arable field margin, native hedgerow with trees, hardstanding road and other rivers and streams. The Ash Brook flows through the site in two places and in proximity to the Site for the majority of its length, adjacent to a public footpath.
- 3.1.4 The woodland is not considered to meet the definition of Lowland Mixed Deciduous Woodland priority habitat due to its young plantation nature.

### **3.2 Baseline Habitats BNG Assessment**

- 3.2.1 Full results of the BNG Assessment can be seen in the Metric spreadsheet for the application, submitted as a separate document. Note the submitted version of the Metric contained offsite measures which the client had hoped to achieve net gain. Since this time, the LPA has explained this option was not viable so another version has been created, using the cable route red line boundary only. This can be seen in **Annex 1** (a separate document).
- 3.2.2 Open mosaic habitat has been assigned as high strategic significance as this area lies within the Wymondley Transforming Station LWS.

### ***Summary of BNG Baseline***

- 3.2.3 The Site baseline habitats generate **10.27 habitat units**, **0.18 hedgerow units** and **0.27 watercourse units**.
- 3.2.4 A breakdown of the individual habitats present within baseline, including their condition, is summarised in **Table 3.1** below, and also provided within the Metric for the Scheme. Baseline habitats are shown on **Figure 1**.

**Table 3.1: Summary Baseline Habitats**

| Metric Habitat ID | Metric Habitat Type           | Area (ha)/ Length (km) | Condition Score | Description                                                           | Justification for Condition                                        | Action(s)                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------|-------------------------------|------------------------|-----------------|-----------------------------------------------------------------------|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                 | Arable field margins tussocky | 0.09 ha                | N/A             | Thin area at the eastern most extent of cable route.                  | Automatically assigned a score of 1.                               | Soil Management Plan to be implemented within this habitat type.<br><br>As such, it is expected that this habitat type will be able to reach baseline habitat type and condition within two years post development.<br><br>Therefore classed as a temporary impact as per pg 34 in the metric user guide and is therefore retained in the metric.                           |
| 2                 | Lowland meadows               | 0.36 ha                | Moderate        | Field in the western half of the cable route, north of the Ash Brook. | Passes criteria: A, B, C & E<br>Fails criteria: D & F              | Soil Management Plan to be implemented within this habitat type.<br><br>As such, it is expected that this habitat type will be able to reach baseline habitat type and condition within two years post development.<br><br>Therefore classed as a temporary impact as per pg 34 in the metric user guide and is therefore retained in the metric.                           |
| 3                 | Modified grassland            | 0.61 ha                | Poor            | Pastoral grassland field in east of cable route.                      | Passes criteria: C, D, F & G<br>Fails: essential criteria A, B & E | Thin lengths of modified grassland loss to facilitate the trench work development will easily recolonise post development, with the metric stating this baseline habitat type and condition should be reached within one year.<br><br>As such, this habitat is classed as a temporary impact as per pg 34 in the metric user guide and is therefore retained in the metric. |
| 4                 | Modified grassland            | 0.01 ha                | Poor            | Small section of grassland between                                    | Passes: C, D, F & G                                                | Thin lengths of modified grassland loss to facilitate the trench work development will easily recolonise post development, with                                                                                                                                                                                                                                             |

| Metric Habitat ID | Metric Habitat Type            | Area (ha)/ Length (km) | Condition Score | Description                                                                                            | Justification for Condition                               | Action(s)                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------|--------------------------------|------------------------|-----------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   |                                |                        |                 | pastoral grassland and public road/footpath.                                                           | Fails: essential criteria A, B & E                        | the metric stating this baseline habitat type and condition should be reached within one year.<br><br>As such, this habitat is classed as a temporary impact as per pg 34 in the metric user guide and is therefore retained in the metric.                                                                                                                                 |
| 5                 | Modified grassland             | 0.13 ha                | Poor            | Modified grassland with bare ground access track along public footpath in western half of cable route. | Passes: C, F & G<br>Fails: essential criteria A, B, D & E | Thin lengths of modified grassland loss to facilitate the trench work development will easily recolonise post development, with the metric stating this baseline habitat type and condition should be reached within one year.<br><br>As such, this habitat is classed as a temporary impact as per pg 34 in the metric user guide and is therefore retained in the metric. |
| 6                 | Developed land, sealed surface | 0.2 ha                 | N/A             | Road eastern half cable route.                                                                         | N/A – Automatically assigned a score of 0.                | Will be subject to cable drilling underneath this habitat type via HDD at a depth of 3m below the surface- therefore no loss or change of surface habitat.                                                                                                                                                                                                                  |
| 7                 | Developed land, sealed surface | 0.06 ha                | N/A             | Road western half cable route.                                                                         | N/A – Automatically assigned a score of 0.                | Will be subject to cable drilling underneath this habitat type via HDD at a depth of 3m below the surface- therefore no loss or change of surface habitat.                                                                                                                                                                                                                  |
| 8                 | Developed land, sealed surface | 0.02 ha                | N/A             | Concrete access track under road.                                                                      | N/A – Automatically assigned a score of 0.                | Concrete to be replaced after cable installed- as such only a temporary impact- no loss or habitat change.                                                                                                                                                                                                                                                                  |

| Metric Habitat ID | Metric Habitat Type                                      | Area (ha)/ Length (km) | Condition Score | Description                                                                            | Justification for Condition                                              | Action(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------|----------------------------------------------------------|------------------------|-----------------|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9                 | Mixed scrub                                              | 0.03 ha                | Moderate        | Mixed scrub either side of the Ash Brook.                                              | Passes criteria: A, B & C<br>Fails criteria: D & E.                      | Will be subject to cable drilling underneath this habitat type via HDD at a depth of 3m below the surface- therefore no loss or change of surface habitat.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10                | Other woodland, broadleaved                              | 0.06 ha                | Moderate        | Other broadleaved plantation woodland in west of cable route.                          | Condition assessment total score of 27.                                  | Will be subject to cable drilling underneath this habitat type via HDD at a depth of 3m below the surface- therefore no loss or change of surface habitat.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 11                | Open mosaic habitats on previously developed land        | 0.14 ha                | Moderate        | OMH within LWS in western half of cable route.                                         | Passes criteria: A, B, C & D1<br>Fails criteria: D2                      | <p>Soil Management Plan to be implemented within this habitat type- briefly the topsoil and subsoil will be removed and replaced in order after cable installation. This will ensure the seed bank is replaced and as areas of removal are surrounded by more of the same habitat type, some natural re-colonisation may also occur. It is expected that this habitat type will be able to reach baseline habitat type and condition within two years post development.</p> <p>As such, this habitat is classed as a temporary impact as per pg 34 in the metric user guide and is therefore retained in the metric</p> |
| H1                | Native hedgerow with trees-associated with bank or ditch | 0.01 km                | Good            | Native hedgerow with trees on eastern most extent of cable route- dry ditch within 2m. | Passes criteria: A1, A2, B1, B2, C1, D1, D2, E1, E2 / Fails criteria: C2 | To be retained and protected via the use of broken trench techniques underneath the hedgerow which will connect to the southern boundary of the main Priory Farm Solar Array site. Broken trench technique involves using hand dug pits either side of the hedge and installing the cable by hand beneath the hedge roots. This will retain the feature and result in minimal impacts.                                                                                                                                                                                                                                  |

| Metric Habitat ID | Metric Habitat Type     | Area (ha)/ Length (km) | Condition Score | Description                                                       | Justification for Condition                                             | Action(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------|-------------------------|------------------------|-----------------|-------------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   |                         |                        |                 |                                                                   |                                                                         | The feature is expected to be in the same condition within two years and as such, is classed as a temporary impact as per pg 34 in the metric user guide and therefore retained in the metric                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| W1                | Other rivers or streams | 0.03 km                | Moderate        | Two sections of the Ash Brook within western half of cable route. | MoRPh survey preliminary condition score of 1.255 = moderate condition. | <p>Post development modelling showed no difference as the development is for an underground cable installation with no permanent above ground habitat changes.</p> <p>No watercourse encroachment and Major/Minor riparian encroachment due to footpath within 4m of banktop on southern aspect and managed field within 4-10m of banktop on the northern aspect (managed public footpaths)</p> <p>This is for two small sections of the Ash Brook (0.01km where the brook is open and 0.02km where the brook is culverted underneath a roundabout) where the cable will be drilled via HDD to a depth of 3m under the water channel - so no significant impacts.</p> <p>The remainder of the cable route (not within this metric) is either over 10m from the Ash Brook bank top, or lies strictly within the footprint of existing public footpaths along the brook. The BNG User Guide states on page 41 that established footpaths are exempt if recorded in the baseline. The Proposed cable route strictly follows the public footpath when adjacent to the brook, and lies immediately next to the section subject to HDD. As such is considered exempt from the watercourse BNG requirements but put here for illustrative purposes to show temporary/no impacts.</p> |

## **4 PROPOSED DESIGN**

### **4.1 Design Overview**

- 4.1.1 The proposed design for the Scheme involves the installation of a cable along the length of the routes red line boundary, connecting the previously consented Priory Farm Solar Array (planning ref: 21/03380/FP) and Wymondley Transforming Station.
- 4.1.2 The alternative cable route layout is shown on drawing numbers:
- 3656-01-001 Rev A,
  - 3656-01-002a Rev B,
  - 3656-01-002b Rev B,
  - 3656-01-002c Rev B,
  - 3656-01-003a Rev B,
  - 3656-01-003b Rev B,
  - 3656-01-003c Rev B, and,
  - 3656-01-004.
- 4.1.3 The amended plan was altered to reduce the extent of the red line boundary within Wymondley Transforming Station Local Wildlife Site (LWS) and extend the location of the HDD trail pits, further reducing impacts within an area of priority habitat lowland meadows.
- 4.1.4 The Cable Route plan including the location of HDD pits is also illustrated in the above drawings.
- 4.1.5 Other lowland woodland, mixed scrub and the Ash Brook will be protected from any significant above ground impacts via the use of drilling underneath these habitat features.
- 4.1.6 Areas of open mosaic habitat within the LWS, and priority habitats across the cable route (lowland meadows and arable field margins), will have mitigated impacts via the implementation of a Soil Management Plan in these areas.
- 4.1.7 The hedgerow with trees on the eastern extent has been mitigated for via the use of broken trench techniques to install the cable underneath this feature and into the adjacent, consented solar farm.
- 4.1.8 The remainder of habitats present will have the new cable laid using open trench techniques, with habitat type and condition expected to be reached within 1 year post development.

### **4.2 Post-works BNG Assessment**

- 4.2.1 Full results of the BNG Assessment can be seen in the Metric spreadsheet for the application, submitted as a separate document.
- 4.2.2 Open mosaic habitat has been assigned as high strategic significance as this area lies within the Wymondley Transforming Station LWS.

## Post-works BNG Summary

- 4.2.3 All proposed works within the alternative cable route boundary have been designed and mitigated for to reduce any long-term impacts over an interim period of two years, as such all are considered retained habitats and the proposed development results in no overall net loss.
- 4.2.4 However, the development still required the mandatory 10% net gain on baseline levels. This required **1.03 habitat area units**, **0.02 hedgerow units** and **0.03 watercourse units**.
- 4.2.5 Habitat credits were consequently purchased from Wild Capital UK. Further details can be seen within the Metric in **Annex 1**, the Biodiversity Net Gain Plan in **Annex 2** and associated habitat unit allocation documents.

## 5 GOOD PRACTICE PRINCIPLES

- 5.1.1 The below table outlines how the development has adhered to each of the ten biodiversity net gain good practice principles for development<sup>8</sup>.

**Table 5.1: Biodiversity Net Gain Good Practice Principles for Development**

| Good Practice Principle                                            | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Apply the mitigation hierarchy                                     | <p>The Scheme has been designed to limit biodiversity impacts as far as possible, largely limited to existing public footpaths and along existing tarmac road, avoiding higher value habitats where possible.</p> <p>Where impacts cannot be avoided, mitigation measures have been implemented as a last resort, and to ensure the development leaves all temporarily impacted habitats in their baseline state within a period of two years.</p> <p>Off-site net gain measures were initially sought for the development; however this was found not to be feasible after communication with the LPA. Habitat units are now being sought instead, with statutory credits potentially sought as the last viable option.</p> |
| Avoid losing biodiversity that cannot be offset by gains elsewhere | No irreplaceable habitats are present within the Site and all trading rules within the Metric will be satisfied by the proposals following the purchase of credits.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Be inclusive and equitable                                         | The Scheme and biodiversity net gain design has been designed to limit all impacts as much as possible and will help further the aims of the national carbon zero aims through facilitating renewable energy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Address risks                                                      | For areas of sensitive habitats such as open mosaic habitat, lowland meadows and arable field margins, a Soil Management Plan will be implemented. The aims of this document is to ensure baseline habitats are to be reinstated post development. It is acknowledged there is a risk that this may not occur, however the document lists                                                                                                                                                                                                                                                                                                                                                                                    |

<sup>8</sup> <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

| Good Practice Principle                              | Justification                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                      | monitoring and contingency measures should this not be achieved within the set time frame.                                                                                                                                                                                                                      |
| Make a measurable biodiversity net gain contribution | The purchase of biodiversity credits would result in a measurable biodiversity net gain, a minimum of 10%. Earlier alternative options aimed to achieve a higher net gain legacy, but were found not feasible due to the very low possibility of potential gas pipe works across the proposed off-site area.    |
| Achieve the best outcomes for biodiversity           | All mitigation measures will be undertaken within the Site to limit impacts and ensure baseline habitats are retained.                                                                                                                                                                                          |
| Be additional                                        | The Proposed Development will result in a minimum required 10%, whilst also facilitating renewable energy.                                                                                                                                                                                                      |
| Create a net gain legacy                             | The Proposed Development will create a measurable net gain, whilst also providing renewable energy to assist net zero targets. The wider Priory Farm Solar Array also provides a significant net gain, well above the mandatory 10%, with an associated management plan to cover a period of at least 30 years. |
| Optimise sustainability                              | Once credits have been purchased, the development will deliver a measurable biodiversity net gain whilst also facilitating a development which will facilitate green, renewable energy for its lifetime.                                                                                                        |
| Be transparent                                       | Options to achieve biodiversity net gain within the Scheme have been sought early on in the process and communicated clearly with the Local Planning Authority. Only once all options have been exhausted, have the purchasing of credits been chosen to progress the project.                                  |

## 6 DISCUSSION

- 6.1.1 The Site baseline habitat generates **10.27 habitat units**, **0.18 hedgerow units** and **0.27 watercourse units**.
- 6.1.2 In terms of baseline habitats, all proposed works have been designed and mitigated for to reduce any long-term impacts over an interim period of two years, as such all are considered retained habitats and the proposed development results in no overall net loss.
- 6.1.3 However, the development still required the mandatory 10% net gain on baseline levels. This required an additional **1.03 habitat units**, **0.02 hedgerow units** and **0.03 watercourse units**.
- 6.1.4 As the cable route red line boundary is so small and given the applicant has no long-term ownership over the land by which to secure a 30 year management plan, there was no scope to achieve net gain with the Site.
- 6.1.5 Following the mitigation hierarchy, off-site mitigation measures within the adjacent associated solar site were initially sought, however this became unfeasible due to an underground gas pipe placement. As such, the applicant then committed to the purchase of habitat bank biodiversity units for the development.
- 6.1.6 With the relevant habitat units subsequently purchased, the Scheme is considered to meet all trading principles, which requires habitats to be replaced on a like-for-like or like-for-better basis.
- 6.1.7 As the minimum required habitat units have been purchased and trading standards are met, it is further considered that the Scheme adheres with policy requirements within the NHLP and NPPF.

FIGURE 1: BNG BASELINE HABITATS

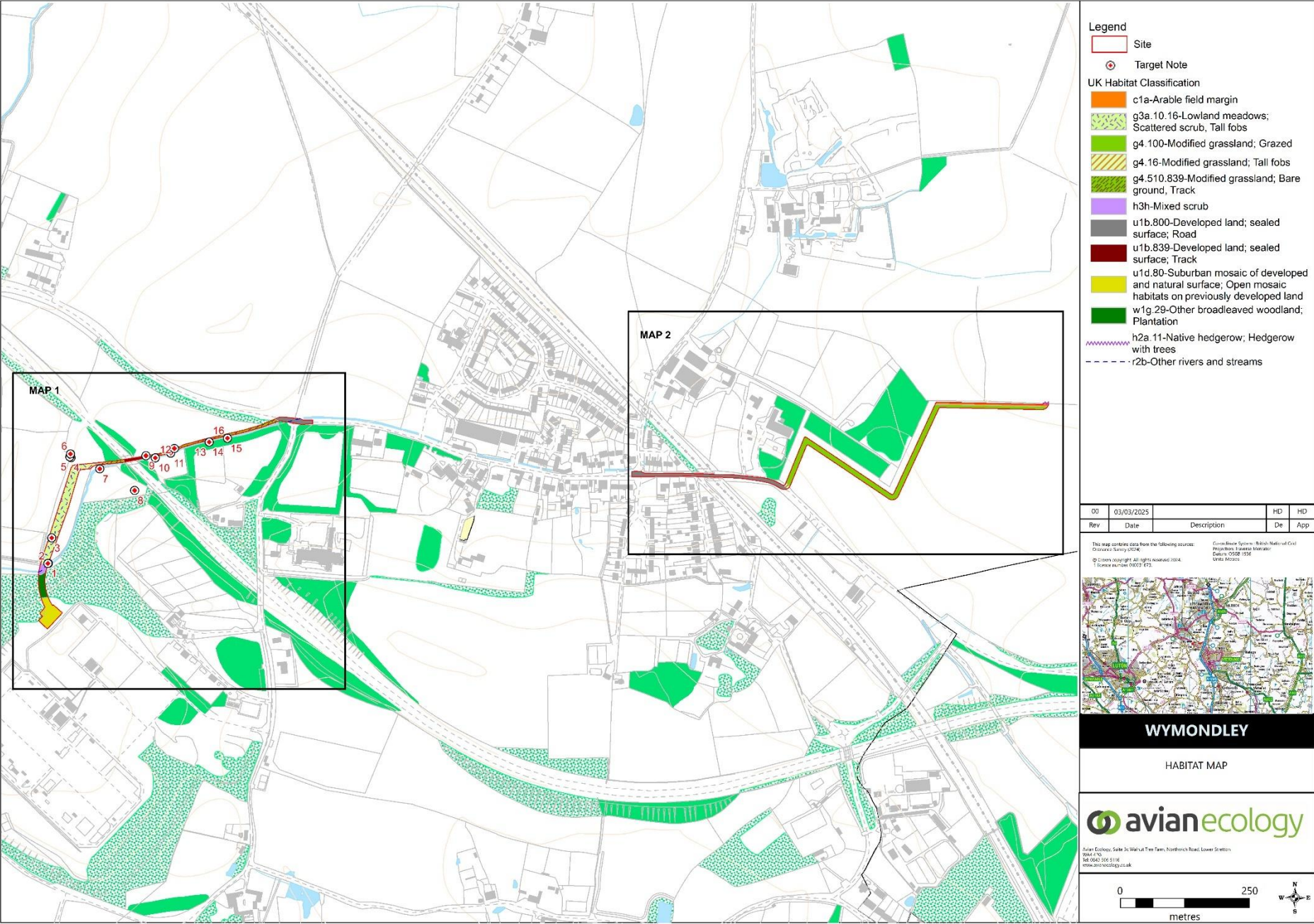


FIGURE 1: BNG BASELINE HABITATS

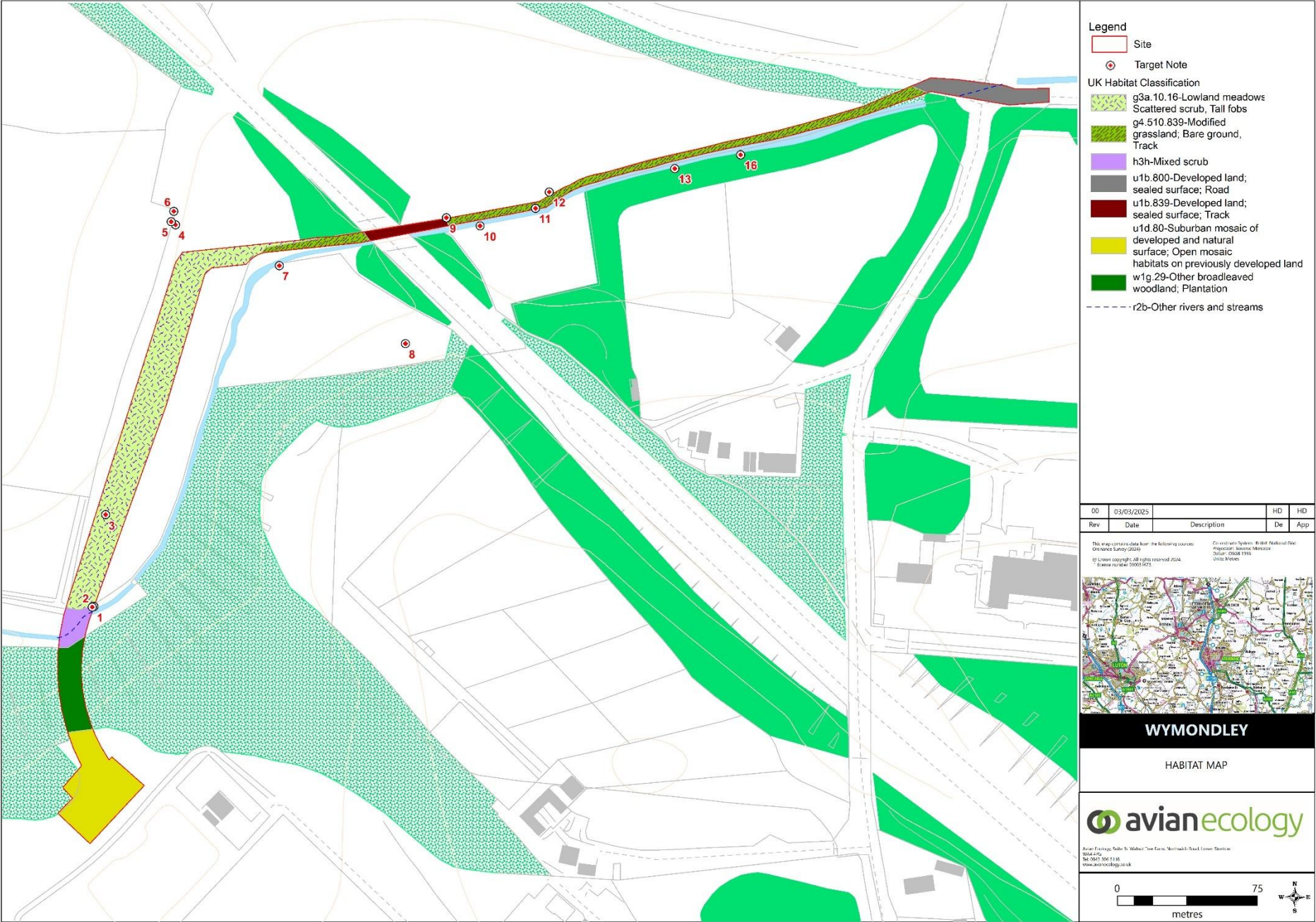


FIGURE 1: BNG BASELINE HABITATS

