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**Subject:** EN010085 - Cleve Hill Solar Park - The Applicant's Deadline 3 Submission (email 6 of 7)  
**Date:** 01 August 2019 23:20:11  
**Attachments:** [REDACTED]

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Dear Hefin,

**EN010085 - Cleve Hill Solar Park - The Applicant's Deadline 3 Submission (email 6 of 7)**

Please find attached the Applicant's Deadline 3 submission.

Please do not hesitate to get in touch if you have any queries.

Kind regards,

Mike

**Michael Bird**

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# CLEVE HILL SOLAR PARK

## **PROGRESSED STATEMENTS OF COMMON GROUND REQUESTED BY THE EXA - KENT WILDLIFE TRUST**

August 2019  
Revision A

Document Reference: 11.2.2  
Submitted: Deadline 3

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**CLEVE HILL**  
SOLAR PARK



# **CLEVE HILL SOLAR PARK**

**DCO APPLICATION REFERENCE EN010085**

**STATEMENT OF COMMON GROUND (SOCG)**

**JUNE 2019**

**BETWEEN:**

- 1) CLEVE HILL SOLAR PARK LTD; AND**
- 2) THE KENT WILDLIFE TRUST (KWT)**

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## 1 INTRODUCTION

1. This Statement of Common Ground (SOCG) has been prepared in relation to an application (the Application) made to the Secretary of State (SoS) for the Department for Business, Energy & Industrial Strategy (BEIS), under section 37 of the Planning Act 2008, seeking a Development Consent Order (DCO) for the Cleve Hill Solar Park (hereafter referred to as the Development). The application was accepted on 14<sup>th</sup> December 2018.
2. This SOCG has been prepared as a means of clearly stating any areas of agreement and disagreement between the Applicant and the Kent Wildlife Trust (KWT), which are set out in sections 3 and 4.
3. The SoCG is supported by an appendix:
  - Appendix A: Biodiversity Metrics
4. In its submitted relevant representation, the Royal Society for the Protection of Birds (RSPB) requested that the Applicant demonstrate biodiversity net gain. Although not specifically requested by KWT, the biodiversity metrics produced provide useful background to the Landscape and Biodiversity Management Plan and are therefore provided for information as Appendix A.

## 2 AGREEMENT

5. Confirmation that the Tables 2, 3 and 4 of this SoCG reflect the points of agreement between the Applicant and KWT at the stated date is provided in Table 1.

***Table 1: Confirmation of Agreement***

| <b>Date</b>     | <b>Signatory</b> | <b>Signature</b> |
|-----------------|------------------|------------------|
| KWT to complete | KWT to complete  | KWT to complete  |

### 3 THE PLANNING INSPECTORATE RULE 6 LETTER ANNEX E SOCG INCLUSIONS

6. The Planning Inspectorate provided an Initial Assessment of Principal Issues as set out in Annex B of the Rule 6 Letter dated 18 April 2019. In relation to those Principal Issues, the Examining Authority (ExA) set out a number of recommended inclusions for the SoCG with KWT with regards to biodiversity and nature conservation (including Habitats Regulations Assessment). Table 2 lists out the areas for inclusion. The issues raised in the Rule 6 Letter are addressed in the Sections 3 and 4 of this SOCG.

**Table 2: SOCG Areas for Inclusion**

| Area for Inclusion  | Applicant Comments  | KWT comments   |
|---|---|--|
| <i>SOCG to include:</i>   | <i>Applicant's response</i>   | <i>KWT's response</i>  |
| Survey areas, assessment of baseline data and data collection methodologies.  | The data analysis and presentation of results are set out fully in Appendix A9.1 (Examination Library reference <a href="#">APP-223</a> ).<br>It was agreed in the pre-submission SOCG with Natural England (Examination Library reference <a href="#">APP-256</a> ) that the survey coverage and methodology of baseline surveys completed are sufficient to enable a thorough assessment of potential effects on SPA/Ramsar birds.        | Agree with NE's analysis.  |
| Analysis of data and the presentation of results, including the use of expert judgements and assumptions.   | The data analysis and presentation of results are set out fully in Appendix A9.1 (Examination Library reference <a href="#">APP-223</a> ).<br>It was agreed in the pre-submission SOCG with Natural England (Examination Library reference <a href="#">APP-256</a> ) that the bird-days metric using 'peak-mean' counts was an appropriate method to measure and mitigate for use of arable land by brent goose, lapwing and golden plover. | Agree that Peak-Mean metric is an appropriate figure for measuring and mitigating impacts on brent geese, lapwing and golden plover. |
| Methodology for Environmental Impact Assessment and Habitats Regulations Assessment, including assessment of cumulative and in-combination effects. | The methodologies for EIA and HRA, including cumulative and in-combination effects are set out in Section 9.2.5 of Chapter 9: Ornithology of the ES (Examination Library reference <a href="#">APP-039</a> ) and in the RIAA (Examination Library reference <a href="#">APP-026</a> ).  | Agree  |
| Likely effects on any protected species and on special interest   | The likely effects on special interest features of  | Agree. Updated surveys on  |

| Area for Inclusion   | Applicant Comments   | KWT comments  |
|--|--|---|
| features of sites designated or notified for nature conservation purpose.  | sites designated or notified for nature conservation purpose are assessed in Section 9.5 of Chapter 9: Ornithology of the ES (Examination Library reference <a href="#">APP-039</a> ) and in the RIAA (Examination Library reference <a href="#">APP-026</a> ).  | protected species are required and expected.  |
| Mitigation and enhancement measures, including likely effectiveness, monitoring procedures and method for securing such measures within the DCO. | Following embedded mitigation measures in the design of the project and applied mitigation measures implemented through the CEMP (Examination Library reference <a href="#">APP-205</a> ), Breeding Bird Protection Plan (BBPP, Appendix B of the outline CEMP), outline SPA Construction Noise Mitigation Plan (SPA CNMP, Examination Library reference <a href="#">APP-243</a> ) and Landscape and Biodiversity Management Plan (LBMP, submitted outline version A – Examination Library reference <a href="#">APP-203</a> ), the Development has been assessed as having the potential to result in adverse and positive effects of low magnitude. No effects are considered to be significant in terms of the EIA Regulations. | <p>More detail is needed in the LBMP before it can be concluded that it will mitigate the impacts.</p> <p>We defer noise issues to the judgement of NE.</p> |
| DCO drafting.  | <p>The draft DCO (Examination Library reference <a href="#">APP-016</a>) includes the following relevant Requirements:</p> <ul style="list-style-type: none"> <li>4 – Landscape and Biodiversity Management Plan (LBMP)</li> <li>11 – Construction Environmental Management Plan (CEMP)</li> <li>12 – Special Protection Area Construction Noise Management Plan (SPA CNMP)</li> <li>13 – European Protected Species</li> </ul>  | Subject to the documents themselves being adequate, these are appropriate DCO inclusions.   |

#### 4 AREAS OF FURTHER DISCUSSION

**Table 3: Scope and Methodology of the Assessment**

| Applicant Statement  | KWT Comments  | Status (KWT to complete)         |
|--|---|----------------------------------|
| <i>Applicant Statement</i>   | <i>KWT Comments</i>   | <i>E.g., Agreed / Not Agreed</i> |
| The 5 km and 10 km search parameters are appropriate for identifying European sites (of non-avian and avian interest respectively) with potential impact pathways and beyond those distances, likely significant effects of the Development on European sites can be reasonably discounted. (Section 5.1 of the RIAA, Examination Library Reference <a href="#">APP-026</a> ).   | These are correct   | Agreed                           |
| Potential impact pathways only exist for The Swale SPA/Ramsar Site and likely significant effects on other European sites within the search areas (Outer Thames Estuary SPA, Thanet Coast and Sandwich Bay SPA/Ramsar Site and Blean Complex SAC) can be reasonably discounted. (Section 5.1 of the RIAA, Examination Library Reference <a href="#">APP-026</a> ).   | Does not seem likely that there will be impacts upon the Outer Thames Estuary SPA or Blean Complex SAC. | Agreed                           |
| <p>The scope of qualifying features associated with The Swale SPA/Ramsar Site and screened into the RIAA are (Section 5.2.4 of the RIAA, Examination Library Reference <a href="#">APP-026</a>):</p> <p>Wintering:</p> <ul style="list-style-type: none"> <li>• dark-bellied brent goose;</li> <li>• European white-fronted goose;</li> <li>• shelduck;</li> <li>• shoveler;</li> <li>• wigeon;</li> <li>• pintail;</li> <li>• teal;</li> <li>• little egret;</li> <li>• oystercatcher;</li> <li>• avocet;</li> <li>• lapwing;</li> <li>• golden plover;</li> <li>• grey plover;</li> <li>• curlew;</li> <li>• bar-tailed godwit;</li> <li>• black-tailed godwit;</li> <li>• knot;</li> <li>• ruff;</li> <li>• sanderling;</li> <li>• dunlin;</li> <li>• green sandpiper; and</li> <li>• greenshank</li> </ul> | Appears to be an accurate list.   | Agreed                           |



| Applicant Statement  | KWT Comments | Status (KWT to complete) |
|--|--------------|--------------------------|
| <p>Breeding:</p> <ul style="list-style-type: none"> <li>• shelduck;</li> <li>• mallard;</li> <li>• moorhen;</li> <li>• coot;</li> </ul> <p>and as other characteristic species:</p> <ul style="list-style-type: none"> <li>• breeding ducks;</li> <li>• breeding waders;</li> </ul> <p>Breeding and wintering:</p> <ul style="list-style-type: none"> <li>• short-eared owl.</li> </ul> <p>Notable invertebrates:</p> <ul style="list-style-type: none"> <li>• <i>Bagous cylindrus</i> (a weevil);</li> <li>• <i>Erioptera bivittata</i> (a crane fly);</li> <li>• <i>Lejops vittata</i> (sea club-rush hoverfly);</li> <li>• <i>Peocilobothris</i> [<i>Poecilobothrus</i>] <i>ducalis</i> (a dancefly);</li> <li>• <i>Philonthus punctus</i> (a rove beetle);</li> <li>• lapwing;</li> <li>• redshank;</li> <li>• reed warbler;</li> <li>• reed bunting;</li> <li>• yellow wagtail; and</li> <li>• marsh harrier.</li> <li>• <i>Micronecta minutissima</i> (a water boatman);</li> <li>• <i>Malchius</i> [<i>Malachius</i>] <i>vulneratus</i> (a malachite beetle);</li> <li>• <i>Campsicnemus majus</i> [<i>magius</i>] (fancy-legged fly);</li> <li>• <i>Elachiptera rufifrons</i> (a true fly); and</li> <li>• <i>Myopites eximia</i> (a true fly).</li> </ul> |              |                          |
| <p>The Conservation Objectives of The Swale SPA have been correctly identified. (Section 5.2.2 of the RIAA, Examination Library Reference <a href="#">APP-026</a>)</p>   |              | Agreed                   |
| <p>The coverage and methodology of baseline surveys completed are sufficient to enable a thorough assessment of potential effects on SPA/Ramsar birds. (Technical Appendices A9.1, A9.2, A9.3 and A9.4 to the ES (Examination Library reference <a href="#">APP-039</a>)).</p>   |              | Agreed                   |
| <p>Screening of likely significant effects in the absence of mitigation are as follows (Section</p>  |              | Agreed                   |

| Applicant Statement  | KWT Comments  | Status (KWT to complete) |
|--|---|--------------------------|
| <p>5.2.6 of the RIAA, Examination Library Reference <a href="#">APP-026</a>):</p> <p>Screened in:</p> <p>Noise/visual disturbance during construction/decommissioning on breeding and wintering bird assemblages;</p> <p>Loss/change in habitats during operation on breeding marsh harrier and wintering dark-bellied brent goose, lapwing and golden plover;</p> <p>Hydrological changes during construction and decommissioning on breeding and wintering bird assemblages and the Ramsar invertebrate community; and</p> <p>Dust emission during construction and decommissioning on breeding and wintering bird assemblages and the Ramsar invertebrate community.</p> <p>Screened out:</p> <p>Noise/visual disturbance during operation;</p> <p>Habitat fragmentation;</p> <p>Operational collision;</p> <p>Recreational access changes; and</p> <p>Invertebrate attraction to solar panels.</p>   |   |                          |
| <p>The cumulative assessment in the ES (Section 9.8, Examination Library reference <a href="#">APP-039</a>) and in-combination assessment in the RIAA (Section 6.2, Examination Library Reference <a href="#">APP-026</a>) are comprehensive.</p>  |   |                          |
| <p>Following embedded mitigation measures in the design of the project and applied mitigation measures implemented through the CEMP (Examination Library reference <a href="#">APP-205</a>), Breeding Bird Protection Plan (BBPP, Appendix B of the outline CEMP), outline SPA Construction Noise Mitigation Plan (SPA CNMP, Examination Library reference <a href="#">APP-243</a>) and Landscape and Biodiversity Management Plan (LBMP, submitted outline version A – Examination Library reference <a href="#">APP-203</a>), Following embedded mitigation measures in the design of the project and applied mitigation measures implemented through the CEMP (Examination Library reference <a href="#">APP-205</a>), Breeding Bird Protection Plan (BBPP, Appendix B of the outline CEMP), outline SPA Construction Noise Mitigation Plan (SPA CNMP, Examination Library reference <a href="#">APP-243</a>) and Landscape and Biodiversity Management Plan (LBMP, submitted outline version A – Examination Library reference <a href="#">APP-203</a>),</p> | <p>More information, evidence or mitigation required for brent geese, lapwing, golden plover and marsh harrier.</p> | <p><b>Not agreed</b></p> |

| <b>Applicant Statement</b>   | <b>KWT Comments</b>  | <b>Status (KWT to complete)</b> |
|--|--|---------------------------------|
| Following embedded mitigation measures in the design of the project and applied mitigation measures implemented through the CEMP (Examination Library reference <a href="#">APP-205</a> ), Breeding Bird Protection Plan (BBPP, Appendix B of the outline CEMP), outline SPA Construction Noise Mitigation Plan (SPA CNMP, Examination Library reference <a href="#">APP-243</a> ) and Landscape and Biodiversity Management Plan (LBMP, submitted outline version A – Examination Library reference <a href="#">APP-203</a> ), the Development is not predicted to result in an adverse effect on the integrity of The Swale SPA/Ramsar Site (Section 8 of the RIAA, Examination Library Reference <a href="#">APP-026</a> ). | More information, evidence or mitigation required for brent geese, lapwing, golden plover and marsh harrier. | <b>Not agreed</b>               |

## 5 RELEVANT REPRESENTATION COMMENTS

**Table 3: Relevant Representation Comments**

| <b>KWT Comments</b>  | <b>Applicant Response</b>  | <b>Status (KWT to complete)</b>        |
|--|--|--|
| <i>Relevant Representation Comments<br/>(RR Reference in bold, <b>KWT-X</b>)</i>   | <i>Applicant's response</i>  | <i>E.g., Agreed / Not Agreed / N/A</i> |
| <b>KWT-2</b><br>It is clear from the survey results that the site of the proposed solar park plays a role in supporting populations of species for which the Special Protection Area (SPA) is notified, and is therefore 'Functionally Linked'. As such, we believe it is incumbent on the Statutory Agencies to consider revision of the SPA boundary to include this land. | The Applicant has recognised that the land proposed for development is functionally linked to The Swale SPA/Ramsar Site (paragraph 75 of Section 9.3.1 of Chapter 9: Ornithology of the ES (Examination Library reference <a href="#">APP-039</a> ) and in paragraph 52 of Section 5.2.1 of the RIAA (Examination Library reference <a href="#">APP-026</a> ). | Agreed                                 |
|  | The assessment presented in Chapter 9 - Ornithology of the ES (Examination Library reference <a href="#">APP-039</a> ) and the HRA documented in the RIAA (Examination Library reference <a href="#">APP-026</a> ) has taken The Swale SPA into consideration.   | Agreed                                 |

| KWT Comments   | Applicant Response  | Status (KWT to complete)  |
|--|---|---|
|  | <p>Natural England confirmed in the pre-submission Statement of Common Ground, November 2018, (Examination Library reference <a href="#">APP-256</a>) that a SPA boundary review has not taken place for The Swale and there is no evidence of a timetable for it taking place. It is appropriate for the assessment to consider The Swale SPA based on the boundaries as they currently stand at the time of the Application, noting that the Development site is functionally linked to The Swale SPA.</p>  | <p>Agreed</p>   |
| <p><b>KWT-3</b><br/>         The success of the Habitat Mitigation Area for Brent geese relies upon achieving a density of 2,097 goose days per hectare, a very specific figure from a study of various management techniques in East Anglia. We do not think it wise to just adopt such a figure without understanding more of the variables that might affect it, not least of which is that the study site was established grassland, rather than arable reversion as is the case here. While a number of studies are also cited, including re-seeding using clover that achieved 1,258 goose days per hectare, as none are directly applicable, we consider the approach insufficiently precautionary for mitigation of a SPA feature.</p> | <p>Technical Appendix A9.1 to Chapter 9 Ornithology of the ES (Examination Library reference <a href="#">APP-223</a>) summarises a number of studies into the density of foraging brent geese on grassland, including others with higher capacity than 2,097 goose-days per hectare. For example, Owen (1977) reported capacity of 2,250 goose days per hectare; Summers and Critchley (1990) recommended that alternative feeding areas to alleviate grazing on cereals should be an area of 50 ha for 1,000 brent geese – equivalent to 120,000 goose-days for the core winter period which exceeds the 101,940 goose-days requiring mitigation.</p> <p>The measure of bird days on the site (as set out in Technical Appendix A9.1 to Chapter 9 Ornithology of the ES (Examination Library reference <a href="#">APP-223</a>)) also uses a precautionary peak-mean statistic (using only the highest count in each month to calculate the mean) to provide confidence in the predicted success of the AR HMA to host at least as many goose-days as the arable land within the site as a whole. The approach is suitably precautionary.</p> <p>NE agrees that the management of the mitigation grassland should be focussed on providing optimal</p> | <p>Agree that 2097 goose-days per hectare is theoretically possible. See point below.</p> <p>The Peak-Mean has been established as the mitigation target.</p> <p>Management of mitigation grassland focussed on brent geese a sensible starting point, but still need to deliver adequate mitigation for lapwing and golden plover.</p> |

| KWT Comments   | Applicant Response   | Status (KWT to complete)   |
|--|--|--|
|  | conditions for brent geese.  |  |
| <p><b>KWT-3</b><br/>Concerns have been raised previously regarding the conflict between stated increases in water quality from the cessation of fertiliser use, and the use of fertiliser to maintain grassland biomass for brent geese. In response it is stated that application of fertiliser is restricted in spatial application in fields to avoid spreading near the field boundaries. However, reference to this in the document referred to appears to be missing, or at least we have not found it. Regardless, it is unclear if the necessary exclusion of the ditches and boundaries to them have been excluded from the functional area of the HMA.</p> | <p>The precise details of fertiliser application in the AR HMA will be developed as the project progresses and the 'live' LBMP (Examination Library reference <a href="#">APP-203</a>) will be updated accordingly. It is anticipated that spreading of organic fertiliser will be restricted to beyond 10 m of wet field boundaries, in line with government guidance.</p> <p>It is not expected that exclusion of fertiliser application at the margins of the field will substantively reduce the total functional capacity of the AR HMA to mitigate the loss of foraging opportunity for brent geese on arable land.</p> <p>NE agrees that the management of the mitigation grassland should be focussed on providing optimal conditions for brent geese.</p> | <p>Not agreed. Revised calculation required.</p>   |
| <p><b>KWT-4</b><br/>It is unclear what impact the significant change to the landscape will have on Marsh Harrier, which at present forages across the site. While we appreciate the distance between the ditch bank tops and the fence line has been increased compared to the original design – giving more habitat that can be managed for Marsh Harrier and increasing the distance between areas of panels – there remains uncertainty as to if the effectiveness of this.</p>   | <p>The outline LBMP (Examination Library reference <a href="#">APP-203</a>) sets out the prescriptions for establishment of large areas of grassland between the solar panel arrays deployed in each field and will be developed further to include objectives and prescriptions for enhancing the water environment, including establishment of new reedbed. The assessment in Chapter 9 – Ornithology of the ES (Examination Library reference <a href="#">APP-039</a>) concludes that harriers will continue to forage at the site and will benefit from utilising the substantially increased area of suitable foraging habitat as quantified in Appendix A.</p>   | <p>Not agreed. More evidence required. Issue is not habitat quality, but behavioural change as a result of landscape change.</p> |
| <p><b>KWT-5</b><br/>There remain a number of questions regarding the aims of some of the areas of new habitats and how these might be achieved, for example cutting vs grazing, stocking densities (based on 'traditional' solar farms), ivermectins in cattle dung etc. that would be hard to summarise here. These may or may</p>  | <p>The Applicant welcomes the opportunity to continue to develop further details of the management prescriptions set out in the LBMP (Examination Library reference <a href="#">APP-203</a>) to optimise the benefits for wildlife, in line with CHSP's Environmental Policy Statement that: The Applicant is committed to the development being a 'good</p>   | <p>Agreed that more information is required and discussions are ongoing.</p>   |

| <b>KWT Comments</b>   | <b>Applicant Response</b>   | <b>Status (KWT to complete)</b>               |
|---|---|---|
| <p>not be resolved via further discussions of the HMSG, but it would be worth allowing for these to be discussed at examination as a number of the conclusions in the ES are based upon their success.</p>  | <p>neighbour' to the adjacent habitats around the site, and to developing ongoing land management practices onsite with input from members of the Habitat Management Steering Group (HMSG) to achieve mutual biodiversity aims and objectives. This is in addition to the wider ecological benefits of decarbonisation through renewable electricity generation.</p> <p>Biodiversity net gain is demonstrated in Appendix A.</p>                  |   |
| <p><b>KWT-6</b><br/>           The Medway Estuary and Swale Strategy proposes Managed Realignment at the development site in order to compensate for habitat loss in the SPA from coastal squeeze. The site provides a unique opportunity for Managed Realignment in the area, and creating a continuum of habitats from mud flat to grazing marsh is a more appropriate use of the site, consistent with wider national aims with regard the environment, biodiversity and landscape. The solar park would prevent this.</p> | <p>The presence of the Development and the opportunity for Managed Realignment (MR) are not mutually exclusive. In the absence of the Development, MR on the Cleve Hill site is unlikely to take place until at least 2039.</p>   | <p>Agreed</p>                                 |
|   | <p>The EA in the MEASS proposes MR from year 20 (Epoch 2) in the absence of the solar park, as there are a number of technical constraints to delivering MR on the Cleve Hill site in Epoch 1 (2019 to 2039).</p>   | <p>Agreed</p>                                 |
|   | <p>The Applicant expects the Development to operate for a finite period, anticipated to be 40 years. The Applicant has drafted a DCO requirement and issued to the Environment Agency for agreement, which would result in the end of the operational phase of the Development after 40 years of operation, subject to the EA (or equivalent body at the time) demonstrating that the MR proposals could be delivered on the Cleve Hill site.</p> | <p>We await DCO wording and EAs response.</p> |

| <b>KWT Comments</b>  | <b>Applicant Response</b>   | <b>Status (KWT to complete)</b> |
|--|---|---------------------------------|
| <p><b>KWT-7</b><br/>Kent Wildlife Trust's objective is to secure the best possible outcome for wildlife, and for the reasons above we believe refusal of the application would achieve that. However, should the Planning Inspectorate and Secretary of State grant the DCO, we will continue to work in good faith with all parties in the interests of biodiversity.</p> | <p>As described above, the Development does not exclude the opportunity for MR within suitable timescales in Epoch 2, subject to the EA (or equivalent body at the time) demonstrating that the MR proposals could be delivered by 2069 on the Cleve Hill site. As well as addressing the wider ecological benefits of decarbonisation through renewable electricity generation, the Development can deliver biodiversity net gain as demonstrated in Appendix A.</p> |                                 |

**APPENDIX A – BIODIVERSITY METRIC REPORT (SEE [[REP2-045](#)])**