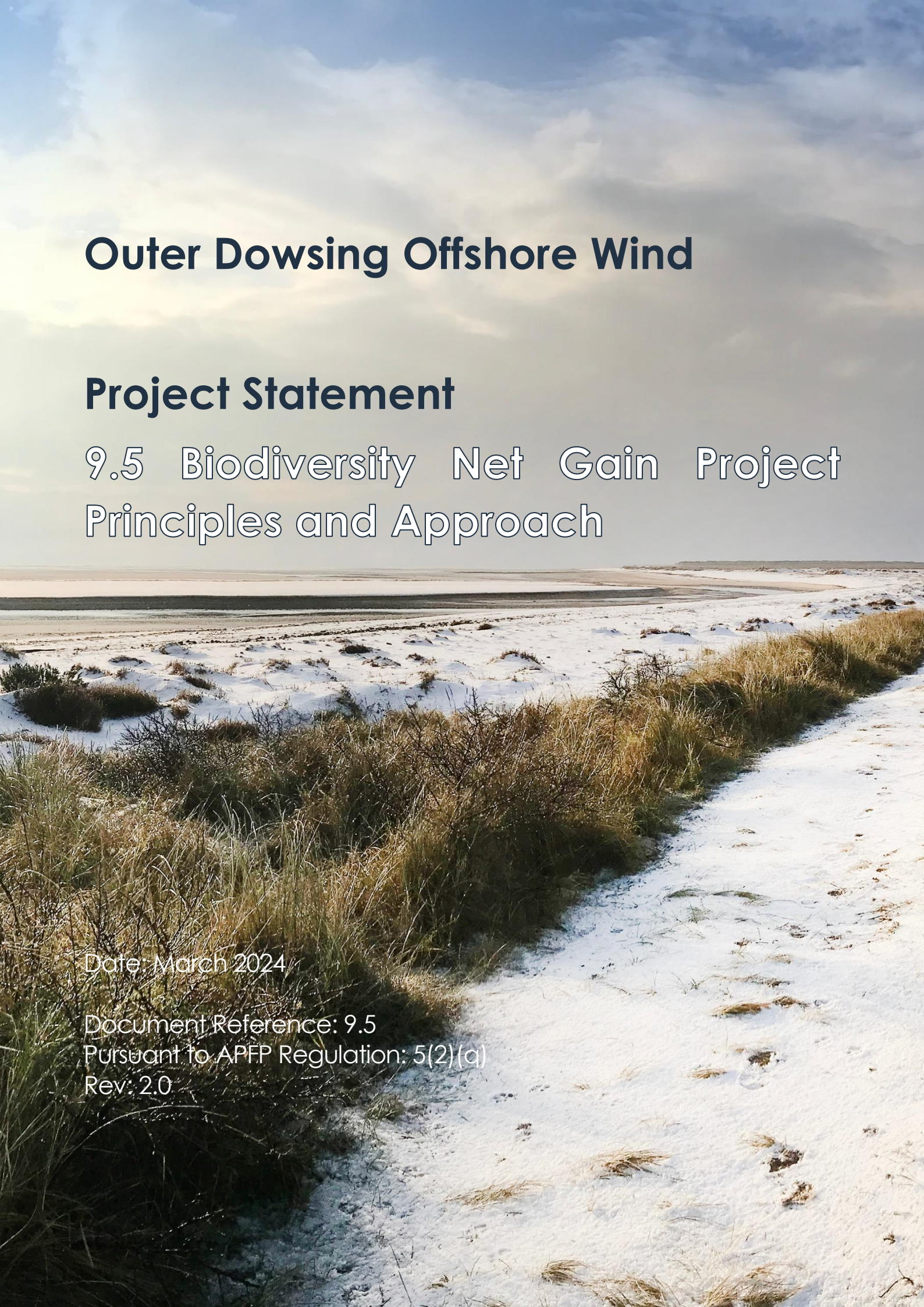
Outer Dowsing Offshore Wind

Project Statement

9.5 Biodiversity Net Gain Project Principles and Approach



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Acronyms & Terminology

Abbreviations / Acronyms

Abbreviation / Acronym	Description
BAP	Biodiversity Action Plan
BNG	Biodiversity Net Gain
BU	Biodiversity Unit
CIEEM	Chartered Institute of Ecology and Environmental Management
CIRIA	Construction Industry Research and Information Association
DCO	Development Consent Order
DEFRA	Department for Environment Food and Rural Affairs
EIA	Environmental Impact Assessment
ES	Environmental Statement
IEMA	Institute of Environmental Management and Assessment
LEDPP	Landscape and Ecology Design Principles Plan
LNR	Local Nature Reserve
LWS	Local Wildlife Site
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
ODOW	Outer Dowsing Offshore Wind
ONSS	Onshore Substation
PEIR	Preliminary Environmental Information Report
SAC	Special Area of Conservation
SPA	Special Protected Area
SSSI	Site of Special Scientific Interest
UKHab	UK Habitat Classification
VHDH	Very High Distinctiveness Habitats

Terminology

Term	Description
400kV cables	High voltage cables linking the OnSS to the NGSS.
400kV cable corridor	The 400kV cable corridor is the area within which the 400kV cables connecting the onshore substation to the National Grid Substation will be situated.
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation, Tota Energies and Gulf Energy Development (GULF)), trading as Outer Dowsing Offshore Wind. The Project is being developed by Corio Generation (a wholly owned Green Investment Group portfolio company), Total Energies and GULF.
Baseline	The status of the environment at the time of assessment without the development in place.
Biodiversity Net Gain	An approach to development that leaves biodiversity in a measurably improved state than it was previously. Where a development has an impact

Term	Description
	on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected, to ensure that the current loss of biodiversity through development will be halted and ecological networks can be restored.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Environmental Statement (ES)	The suite of documents that detail the processes and results of the EIA.
Export cables	High voltage cables which transmit power from the Offshore Substations (OSS) to the Onshore Substation (OnSS) via an Offshore Reactive Compensation Platform (ORCP) if required, which may include one or more auxiliary cables (normally fibre optic cables).
Haul Road	The track within the onshore ECC which the construction traffic would use to facilitate construction.
Impact	An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial.
Intertidal	The area between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS).
Landfall	The location at the land-sea interface where the offshore export cables and fibre optic cables will come ashore.
Maximum Design Scenario	The project design parameters, or a combination of project design parameters that are likely to result in the greatest potential for change in relation to each impact assessed.
Mitigation	Mitigation measures are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
National Grid Onshore Substation (NGSS)	The National Grid substation and associated enabling works to be developed by the National Grid Electricity Transmission (NGET) into which the Project's 400kV Cables would connect.
National Policy Statement (NPS)	A document setting out national policy against which proposals for Nationally Significant Infrastructure Projects (NSIPs) will be assessed and decided upon.
Offshore Substation (OSS)	A structure attached to the seabed by means of a foundation, with one or more decks and a helicopter platform (including bird deterrents), containing— (a) electrical equipment required to switch, transform, convert electricity generated at the wind turbine generators to a higher voltage and provide reactive power compensation; and (b) housing accommodation, storage, workshop auxiliary equipment, radar and facilities for operating, maintaining and controlling the substation or wind turbine generators.
Onshore Export Cable Corridor (ECC)	The Onshore Export Cable Corridor (Onshore ECC) is the area within which the export cables running from the landfall to the onshore substation will be situated.
Order Limits	The combined name for all onshore infrastructure associated with the Project from landfall to grid connection.
Outer Dowsing Offshore Wind (ODOW)	The Project.
Onshore substation (OnSS)	The Project's onshore HVAC substation, containing electrical equipment, control buildings, lightning protection masts, communications masts, access,

Term	Description
	fencing and other associated equipment, structures or buildings; to enable connection to the National Grid.
Order Limits	The area subject to the application for development consent, the limits shown on the works plans within which the Project may be carried out.
Preliminary Environmental Information Report	The PEIR was written in the style of a draft Environmental Statement (ES) and provided information to support and inform the statutory consultation process during the pre-application phase.
The metric	Statutory Biodiversity Metric (DEFRA, Feb 2024), or earlier versions, as applicable.
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.
Receptor	A distinct part of the environment on which effects could occur and can be the subject of specific assessments. Examples of receptors include species (or groups) of animals or plants, people (often categorised further such as 'residential' or those using areas for amenity or recreation), watercourses etc.
Study Area	Area(s) within which environmental impact may occur – to be defined on a receptor-by-receptor basis by the relevant technical specialist.

Reference Documentation

Document Number	Title
6.1.3	Project Description
6.1.21	Onshore Ecology
6.3.21.1	Onshore Ecology Desk Study
6.3.21.2	UK Habitat Classification Survey

1 Introduction

1. This Biodiversity Net Gain Project Principles and Approach Statement has been prepared and submitted alongside the Environmental Statement (ES) for Outer Dowsing Offshore Wind (ODOW) (the Project). The Project is a Nationally Significant Infrastructure Project (NSIP) proposed by GT R4 Limited (trading as Outer Dowsing Offshore Wind) hereafter referred to as the 'Applicant'. An Environmental Impact Assessment (EIA) has been undertaken, the findings of which are presented within the ES, which accompanies this Development Consent Order (DCO) application.
2. The Project will include both offshore and onshore infrastructure including an offshore generating station (windfarm) located approximately 54km from the Lincolnshire coastline, export cables to landfall, onshore cables, an onshore substation, connection to the electricity transmission network, and ancillary and associated development (see Volume 1, Chapter 3: Project Description 6.1.3 for full details).
3. This report presents the initial findings of the provisional Biodiversity Net Gain (BNG) assessment and presents the Project's principles and approach to BNG in respect of proposed onshore aspects of the Project. Onshore it reflects the landfall, the Onshore Export Cable Corridor (ECC) (a typically 80m wide corridor around a centre line totalling approximately 70km in length), the Onshore substation (OnSS), a 400kV cable corridor connecting the OnSS to the Connection Area (an indicative search zone for the National Grid substation (NGSS) in to which the Project will ultimately connect (hereafter collectively referred to as the onshore infrastructure). It has been prepared using the information detailed in the ES, namely Volume 1, Chapter 3: Project Description (Document Reference 6.1.3), and baseline ecology data gathered as part of the EIA, which is reported in full in Volume 1, Chapter 21: Onshore Ecology (Document Reference 6.1.21) of the ES and associated appendices.
4. This report is accompanied by a preliminary appraisal (Annex A) for the Project undertaken in line with the government sponsored biodiversity metric and its supporting guidance. The assumptions made are in line with those that are intended to be adopted for further iterations of this metric as the detailed design phase progresses; the assumptions of which are outlined throughout this report. Annex A presents the initial preliminary appraisal of the net loss for the Project as a baseline for the Applicant to identify how net gain could be achieved. Therefore, providing a guide for the Applicant to use in relation to those commitments already made by the Project *(such as enhancement opportunities and the extensive planting scheme (See Outline Landscape and Ecological Mitigation Strategy (OLEMS) (document reference 8.10))* as well as through their consultation with respect to BNG opportunities (such as those with the RSPB Greater Frampton Vision Project). As discussed throughout this report, further iterations of this matrix will be prepared in relation to the BNG commitments and expected net gain as the detailed design progresses and opportunities are better defined and can be measured. A "design stage" report will be produced following DCO decision.

1.1 Background and Project Site Description

5. The approach taken for the ES has been to consider a "maximum design scenario" (MDS), so that the assessment of impacts and proposed mitigation measures are precautionary but proportionate to the proposed activities. The Project's MDS relative to Ecology is presented in Chapter 21 (Document Reference: 6.1.21) using the information presented in Table 21.15 of Chapter 21 (Document Reference 6.1.21).
6. Completion of the Government's Statutory Biodiversity Metric requires a fixed design, project delivery timetable, and footprint of proposed temporary and permanent construction activities to accurately complete the metric. BNG is not a requirement for NSIPs until November 2025, however the BNG approach and future calculation are being provided on a voluntary basis in response to comments received during stakeholder engagement. These include Scoping Opinion responses from Natural England and the Lincolnshire Wildlife Trust (The Planning Inspectorate, 2022), comments made during Expert Topic Group meetings and Section 42 Comments on the Phase 2 Section 42 consultation response from South Holland District Council, dated 20th July 2023.
7. It is proposed that the final "design stage" BNG report is undertaken once a Development Consent Order (DCO) is granted and when the design parameters for BNG can be further refined. The BNG assessment is proposed to be updated as required throughout the examination phase and then, post-DCO decision, based on the detailed scheme design stage.

1.1.1 Onshore Order Limits Segments

8. Due to the linear footprint of the Project, the Survey Area for some receptors is relatively large-scale, therefore, to assist with interpretation and explanation of associated data, the Order Limits has been split into segments. The extent of these segments has been aligned with key geographical features such as roads or rivers which cross the Order Limits.
9. The segments for the onshore Order Limits are shown in Table 1.1.

Table 1.1 Segments of the Onshore Project Order Limits

Segment Name
ECC 1: Landfall to A52 – Hogsthorpe
ECC 2: A52 – Hogsthorpe to Marsh Lane
ECC 3: Marsh Lane to A158 - Skegness Road
ECC 4: A158 – Skegness Road to Low Road
ECC 5: Low Road to Steeping River
ECC 6: Steeping River to Fodder Dike Bank/Fen Bank
ECC 7: Fodder Dike Bank/Fen Bank to Broadgate
ECC 8: Broadgate to Ings Drove
ECC 9: Ings Drove to Church End Lane
ECC 10: Church End Lane to The Haven
ECC 11: The Haven to Marsh Road
ECC 12: Marsh Road to Fosdyke Bridge
ECC 13: Fosdyke to Surfleet Marsh OnSS/Marsh Drove

1.2 Purpose of this report

10. The purpose of this report is to provide further information on the BNG principles and approach for the Project. This report is intended to provide sufficient information as to the performance of the Project against the government sponsored biodiversity metric and its supporting guidance, based on key assumptions and the design detail available at DCO application stage and reflecting the scale and type of development proposed.
11. The report is presented to inform stakeholders and demonstrate alignment with relevant planning policies.

1.3 Other supporting documents

12. Iterations of the BNG assessment would utilise baseline data collected during 2023 (such as was utilised in the Annex 1 BNG Appraisal) and any additional data that might be gathered following Application and prior to the assessment phase. Specifically, this report is supported by the following reports or figures, which are either included as appendices or contained within Chapter 21 (Document Reference 6.1.21):
    - Habitat baseline map and descriptions, using the UK Habitat Classification system (Appendix 21.2: UK Habitat Classification Survey (Document Reference 6.3.21.2));
    - Post construction landscaping plan;
    - Initial outputs and guidance published in Natural England's Biodiversity Metric 4.0 calculator and User Guide (Natural England, 2021); and
    - Guidance associated with the publication of the Defra Statutory Biodiversity Metric, in February 2024[1].

1.4 Relevant Policy and Legislation

1.4.1 Environment Act 2021

13. The Environment Act (the Act) gained Royal Assent on 9 November 2021. The Act provides a mechanism for implementing Government's ambitions for 'improving the natural environment', which were previously set out in publications, including the 25 Year Environment Plan (DEFRA, 2018[2]).
14. The Act implements the ambitions for an improved natural environment, by setting out statutory requirements which mandate action, under the oversight of the newly formed Office for Environmental Protection (OEP). The focus of the Act is the *"…provision [of] targets, plans*

[1] Department for Environment, Food & Rural Affairs (2024) *Statutory Biodiversity Metric Tools and Guides.* Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides [Accessed 14/02/2024]
[2] DEFRA (2018) A Green Future: Our 25 Year Plan to Improve the Environment (25 Year Environment Plan - GOV.UK (www.gov.uk)) [accessed 05/03/2023]

and policies for improving the natural environment…" and its requirements are structured around a number of broad themes (Introduction to The Environment Act 2021 available at legislation.gov.uk).

15. Section 98 and Schedule 14 of the Act sets out provisions for 'Biodiversity gain as condition of planning permission'. The Town and Country Planning Act 1990 (amended on 12th February 2024) requires planning applications to be supported with additional information on the change in the biodiversity value attributed to a project, with biodiversity metric calculations, and with biodiversity gain plans using metrics, guidance and templates provided by government. Planning authorities will be required to consider these submissions in the exercise of their planning functions, to ensure that they are secured, approved and where relevant registered. Biodiversity Net Gain is not due to become a requirement however for NSIPs until November 2025.
16. Section 99 and Schedule 15 of the Environment Act set out provisions for *'Biodiversity gain in nationally significant infrastructure projects'* which, subject to enactment through subsequent regulations, makes provision for amendment to Sections 37, 120 and 232 of the Planning Act 2008. NSIPs are not subject to the January 2024 implementation of the Environment Act. It is anticipated that implementation of BNG for NSIPs is planned for November 2025 delivery and is subject to the issuance of additional secondary legislation and guidance.
17. A Defra Policy Paper (Defra, 2023) titled "Nationally Significant Infrastructure: action plan for reforms to the planning process", states in Section 4.7 that: *"We will incorporate biodiversity net gain (BNG) requirements for all (terrestrial) NSIP projects from November 2025 and develop an approach for marine net gain (MNG). The biodiversity net gain requirement for NSIPs is to achieve at least 10% measurable net gain on all terrestrial and intertidal development, which is to be secured for at least 30 years. Defra is developing a draft biodiversity gain statement, which will set out the detail of the biodiversity net gain requirement for NSIPs. Defra plans to consult on this draft statement in early 2023"*.

1.4.2 National Planning Policy Framework (NPPF), 2023

18. The National Planning Policy Framework (NPPF) sets out guidance for LPAs and decision makers on how to apply planning policies when drawing up plans and making decisions about planning applications. Along with Government Circular 06/05 (Office of the Deputy Prime Minister,2005) the broad policy objectives in relation to the protection of biodiversity and geological conservation in England through the planning system are set out. Specific policies relating to habitats and biodiversity are set out in Section 15, from paragraph 180, those sections of particular relevance to this report are extracted below:
19. Paragraph 180 states that*: "Planning policies and decisions should contribute to and enhance the natural and local environment by:*
    a. *Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); …*

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; …"

20. Paragraph 186 states that*: "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; …

c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists; 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."

1.4.3 National Policy Statements for Energy Infrastructure

21. National Policy Statements for Energy Infrastructure are relevant to the Project. EN-1 (the Overarching National Policy Statement for Energy, November 2023) includes several references to the provision of net gains for biodiversity in Section 4.6.6 – 4.6.12. Section 4.6.6. states that energy NSIP proposals "*should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.*"
22. Section 4.6.7 states *"In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application".*
23. Section 4.6.10 states "*Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations*…"
24. Sections 4.6.11 and 4.6.12 consider the location of biodiversity gain, stating that "*Biodiversity net gain can be delivered onsite or wholly or partially off-site*." And going to state: "*When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes*…"
25. Irreplaceable habitats (which are specifically referenced in Biodiversity Net Gain principles and guidance) are referred to in NPS-EN1. Section 5.4.14 and 5.4.15 define irreplaceable habitats and identify examples of these habitats, to include: "…*ancient woodland…ancient and veteran trees… blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, mediterranean saltmarsh scrub, and lowland fen.*" Section 5.4.17 states that "*the applicant should ensure that the ES clearly sets out any effects on….irreplaceable habitats*."

1.4.4 Local Plans

26. Local Plans, Supplementary Planning Documents and other relevant documents have been reviewed to assess if any considered BNG in a particular manner that should be accounted for in this report. The following documents were reviewed in this regard:

- South East Lincolnshire Local Plan 2011 – 2036;
- South East Lincolnshire Councils Partnership Climate Change Strategy 2022;
- East Lindsey Local Plan Core Strategy 2018; and
- Lincolnshire Biodiversity Action Plan (2011-2020) 3rd Edition.

27. The South East Lincolnshire Local Plan 2011 – 2036 contained Policy 28: The Natural Environment, which contains the following relevant text:

"A high quality, comprehensive ecological network of interconnected designated sites, sites of nature conservation importance and wildlife-friendly greenspace will be achieved by protecting, enhancing and managing natural assets: …

…3. Addressing gaps in the ecological network: a. by ensuring that all development proposals shall provide an overall net gain in biodiversity, by:

i. protecting the biodiversity value of land, buildings and trees (including veteran trees) minimising the fragmentation of habitats;

ii. maximising the opportunities for restoration, enhancement and connection of natural habitats and species of principal importance;

iii. incorporating beneficial biodiversity conservation features on buildings, where appropriate; and maximising opportunities to enhance green infrastructure and ecological corridors, including water space; and

iv. conserving or enhancing biodiversity or geodiversity conservation features that will provide new habitat and help wildlife to adapt to climate change, and if the development is within a Nature Improvement Area (NIA), contributing to the aims and objectives of the NIA…"

28. The Lincolnshire Biodiversity Action Plan (BAP): 2011 - 2020 3rd Edition (LCC, 2011) sets out definitions of Priority Habitats and Species present within the county, refining, where appropriate, descriptions provided in the UK BAP.

29. Lincolnshire Local Nature Recovery Strategy is in preparation by a partnership, led by Lincolnshire County Council[3]. The plan is currently in data-gathering and consultation phase and no documents are publicly available. No other policies relevant to BNG were found.

[3] Lincolnshire County Council (30th June 2023) (https://www.lincolnshire.gov.uk/news/article/1523/improving-wildlife-habitats-and-biodiversity-in-greater-lincolnshire) [last accessed 05/03/2024]

2 Biodiversity Net Gain Concept

2.1 Overview

30. To establish whether the Project will contribute positively to biodiversity, the Statutory Biodiversity Metric 4.0 (Defra, 2023) would be used. This section sets out the method and principles of the Biodiversity Metric.
31. The Statutory Biodiversity Metric (hereafter known as "the metric" and referring to the statutory metric and previous versions unless otherwise stated) uses habitats as a proxy for biodiversity. Its primary application is to provide planners and developers with a method of establishing how much and what type of habitats should be created, or enhanced, in order to ensure that the impacts of a development do not result in a net loss of biodiversity. Habitats are assigned the following 'multiplier' scores:
    - Distinctiveness: A measure of the type and importance of a habitat;
    - Condition: A measure of the present or predicted condition of a habitat type; and
    - Strategic significance: How a habitat and its location is regarded within Local Biodiversity Strategy, principally Local Nature Recovery Strategies.
32. Habitats are described in the metric using standard units referred to as biodiversity units (BUs). There are three distinct types of BUs, and these are not of equivalence or interchangeable. The three BUs are as follows:
    - Habitat BUs – which describe areas of habitat based on measurement in hectares;
    - Linear BUs – which describe hedgerows and lines of trees measured in kilometres; and
    - Riparian BUs – which described rivers and streams measured again in kilometres.
33. The overall calculation of the change in biodiversity resulting from a project or development is derived by subtracting the evaluation of pre-project or 'baseline' biodiversity units from the number of units estimated to be achieved after project completion.
34. For post-development enhancement and creation of habitats, additional risk multipliers are imposed; these are as follows:
    - Difficulty: More difficult habitats to create or restore incur a greater risk, e.g. where there is uncertainty around the likely success of the action;
    - Time to target condition: In general, it takes longer for habitats to reach a better condition, plus certain habitats by their very nature take longer to create or restore; and
    - Spatial risk, if habitats are created off-site, an additional risk score is applied.

2.2 Biodiversity Net Gain Rules and Principles

35. Defra advise in its Statutory Biodiversity Metric User Guide that the Metric is a tool that helps inform plans and decisions, by using habitats as a proxy for measuring biodiversity value, but that any assessment must be undertaken with awareness of its limitations. The metric specifically requires interpretation and ecological expertise to provide evidence of the appropriateness of proposed approaches to BNG. It sets out a series of key principles and rules that help to support an understanding whether proposals support wider considerations that a calculation outputs.

36. The process of achieving and assessing BNG through the use of the metric must adhere to the four rules, otherwise a net gain cannot be claimed. The Biodiversity Metric Rules are set out in Table 2.1.

Table 2.1 Biodiversity Metric Rules (Statutory Biodiversity Metric User Guide, Feb 2024)

Rule Number	Rule Detail
Rule 1	The trading rules of this biodiversity metric must be followed.
Rule 2	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.
Rule 3	To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the BNG objective has been met.
Rule 4	In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

37. In addition to the metric rules, there are nine principles of using the metric, which also inform its use and guide good practice.

Table 2.2 Biodiversity Metric Principles (Statutory Biodiversity Metric User Guide, February 2024)

Principle	Principle detail
1	The metric assessment should be completed by a competent person.
2	The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.
3	This biodiversity metric should be used in accordance with established good practice guidance and professional codes.
4	This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
5	Biodiversity units are a proxy for biodiversity and should be treated as relative values.
6	This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.

Principle	Principle detail
7	Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
8	Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.
9	This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to: ▪ maintain habitat extent - supporting more, bigger, better and more joined up ecological networks ▪ ensure that proposed or retained habitat parcels are of sufficient size for ecological function

38. In addition, to the principles specific to the metric, there are long-established Good Practice Principles for BNG that have been prepared by CIEEM, CIRIA and IEMA[4,5,6,7]. These are summarised in Table 2.3.

39. The "CIEEM BNG Principles" apply to all aspects of the BNG process, which is substantially broader than the rules and principles that underpin the statutory metric.

Table 2.3 Biodiversity Net Gain Best Practice Principles (CIEEM, CIRIA, IEMA 2016)

Principle	Principle detail
Principle 1	Apply the Mitigation Hierarchy: Avoid and then minimise impacts on biodiversity. As a last resort, and in agreement with stakeholders and decision-makers, compensate for losses that cannot be avoided.
Principle 2	Avoid losing biodiversity that cannot be offset by gains elsewhere: Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset.
Principle 3	Be inclusive and equitable: Engage stakeholders in designing, implementing, monitoring and evaluating the approach to Net Gain. Share the benefits fairly among stakeholders.
Principle 4	Address risks: Mitigate difficulty and/ or uncertainty using well-accepted ways to add contingency when calculating biodiversity losses and gains.
Principle 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.
Principle 6	Achieve the best outcomes for biodiversity: Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge.
Principle 7	Be additional: Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e., do not deliver something that would occur anyway).
Principle 8	Create a Net Gain legacy: Ensure Net Gain generates long-term benefits.

[4] Biodiversity Net Gain: Good practice principles for development CIEEM, CIRIA, IEMA, 2016

[5] Baker, J., Hoskin, R., Butterworth, T. Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide (2019) CIRIA C776a

[6] BS 8683:2021: Process for designing and implementing Biodiversity Net Gain. Specification (2021)

[7] CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK

Principle	Principle detail
Principle 9	Optimise sustainability: Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
Principle 10	Be transparent: Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

2.2.1 Metric Rule 1: Trading Rules

40. In respect of Rule 1 (Table 2.1) the trading rules for the metric are described in Table 2.4. Trading rules were developed to protect high value habitats and ensure that the loss of high-value habitats is not purely compensated for by the creation of larger areas of low-value habitats. For example, the loss of a habitat of high distinctiveness must be replaced on a like-for-like basis.

Table 2.4 Trading Rules to Compensate for Losses

Baseline Habitat Distinctiveness	Area Module (area units)	Hedgerow Module	Watercourse Module (Watercourse Units)
Very High	Priority should be given to replacing losses with area habitat units of the same habitat type	Losses must be replaced with hedgerow units of the same habitat type.	Priority should be given to replacing losses with watercourse units of the same habitat type
High	Losses must be replaced with area units of the same habitat type.	Losses must be replaced with hedgerow units of the same habitat type or of a higher band.	Losses must be replaced with watercourse units of the same habitat type.
Medium	Losses must be replaced by area units of either medium band habitats within the same broad habitat type or any habitat from a higher band from any broad habitat type.	Losses must be replaced with hedgerow units of the same or higher band.	Losses must be replaced with watercourse units of the same habitat type.
Low	Losses must be replaced with area units of the same or higher band.	Losses must be replaced with hedgerow units of the same or higher band.	Losses must be replaced with watercourse units of a higher band.
Very Low	Not applicable	Losses must be replaced with hedgerow units of the same or higher distinctiveness band	Not applicable

41. Trading rules only apply to “no net loss”; gain requirements can be met from creation or enhancement of any habitat (in the relevant module – Rule 2). Further guidance is provided relating to habitats of very high distinctiveness, but no habitat types qualifying as of very high distinctiveness are recorded within the Order Limits.

2.2.2 Irreplaceable Habitats

42. Irreplaceable Habitats are deemed to have a very high biodiversity value and are deemed so difficult to create that it would be impossible to achieve a biodiversity gain if these habitats were lost.
43. Irreplaceable habitats have significant protection in the NPPF (See paragraph 186 (c) in Section 1.4.2 above) and NPS-EN-1 (sections 5.4.14 – 5.4.17). For BNG purposes, the 10% net gain requirement is not applied to irreplaceable habitats. If there are impacts to irreplaceable habitats as a result of a development, in accordance with Principle 2 of the Best Practice Principles for Net Gain (CIEEM, CIRIA and IEMA, 2016) and guidance published within British Standard BS8683:2021, a net gain for the Project cannot be secured and will require bespoke compensation to be agreed with the LPAs. If there are no impacts, enhancement of irreplaceable habitats can contribute to towards a developments BNG requirement.
44. Government has published secondary legislation, the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, which confirms how Irreplaceable Habitats are to be considered in the new biodiversity gain requirement under the Town and Country Planning Act 1990 (as amended by The Environment Act 2021). The initial schedule of irreplaceable habitats for biodiversity gain purposes, broadly mirrors the list of examples within the NPPF and the NPS (listed in Section 1.4.3 above). The schedule makes provision for Natural England to issue guidance for the purposes of identifying whether a habitat falls within the descriptions below.
45. Irreplaceable habitats include:
    - Ancient woodland;
    - Ancient and veteran trees;
    - Blanket bog;
    - Limestone pavements;
    - Coastal sand dunes;
    - Spartina saltmarsh swards;
    - Mediterranean saltmarsh scrub; and
    - Lowland fens.
46. Irreplaceable habitats do exist within the Order Limits and are considered within Chapter 21: Onshore Ecology of the Environmental Statement (Document Reference 6.1.21). These are limited to coastal sand dunes, present at the landfall and the potential for veteran trees in those areas where land access was restricted. Impacts on all irreplaceable habitats will be avoided as a result of the embedded and non-embedded mitigation put in place (Section 21.7 and 21.9,

Document Reference 6.1.21). Avoidance measures are primarily focussed on the adopted of trenchless techniques and siting of the onshore infrastructure to avoid field margins.

2.3 Biodiversity Net Gain Plan

47. In February 2024, Defra published a biodiversity gain plan template (Defra, 2023a), alongside guidance and information on the plan for developers and local planning authorities (LPAs). Within this template, Defra state that the purpose of the biodiversity gain plan is *"to show how you will achieve BNG…you must provide evidence for your BNG decisions"*. The plan includes:
    - Details of the applicant responsible for submission of the plan and the person responsible for completion of the plan;
    - Details of the BNG strategy: how impacts to habitats been avoided or minimised;
    - Presence and treatment of irreplaceable habitats; and
    - Details as to the use of on-site habitat enhancements, off-site enhancements and/or the rationale for the proposed use of Statutory biodiversity credits.
48. Government guidance indicates that it is its intention that the biodiversity gain plan will be submitted after an examining body has granted consent and, therefore, completion of this document is not deemed necessary at this time. However, the contents of the draft plan and the guidance has been reviewed to ensure the Project can meet its requirements.

2.4 Field Survey Data Collection Methods

49. In supporting the reporting of biodiversity changes, SLR have made reference to:
    - Statutory Biodiversity Metric - Calculation Tool;
    - Statutory Biodiversity Metric - User Guide;
    - Statutory Biodiversity Metric – Condition Assessments; and
    - Earlier publications and versions of the metric, published by Natural England.
50. The Metric uses a modified version of a unified habitat classification system known as the UK Habitat Classification system (UKHab). Field survey habitat data was collected using Version 1.1 of the UKHab methodology (UKHab website). In 2023, UKHab version 2.0 was published, which has updated the system, definitions, and coding. The Project has committed to continue to use UKHab v1.1 for this project. The changes implemented in Hab v2.0 have been reviewed and updating the project to UKHab v2.0 would not have a material difference on the outcomes predicted for the Project.
51. The statutory metric calculator requires the condition of habitats to be assessed using the Statutory Biodiversity Metric Habitat Condition Assessment sheets for each habitat, provided by Defra (February, 2024). The statutory version of the condition assessment is slightly different to earlier published versions. For the final post-DCO submission, field data will be translated into the statutory metric condition assessment, or the most up to date version applicable to NSIP applications.

52. UKHab and condition assessment data was collected during field surveys in 2023. The full results of the UKHab survey can be found in Appendix 21.2 (Document Reference 6.3.21.2). UK Habitat Survey Data and condition assessment data were collected in a bespoke field application, designed by SLR Consulting Ltd within ArcGIS Fieldmaps.

53. Only field survey data that falls within the Order Limits, as illustrated on Figure 21.2.1 (Document Reference 6.3.21.2) would be brought forward and used in the BNG assessment.

2.4.1 Limitations

54. Limitations relating to the collection of field data for UKHab and condition assessment are stated in Appendix 21.2 (Document Reference 6.3.21.2).

3 Outer Dowsing Biodiversity Net Gain Approach

55. The Project is an NSIP, seeking approval for development consent. Projects of this type are not subject to the February 2024 implementation date of mandatory 10% BNG. Instead, implementation of BNG for NSIPs is planned for November 2025 and is subject to the issuance of additional secondary legislation and guidance. During this interim stage, whilst the Project has no legal obligation to provide 10% BNG as measured using the statutory metric, the Project retains its position in relation to BNG and is exploring opportunities to deliver on this recent legislation and is actively engaging with organisations and environmental bodies local to the Project's footprint to identify potential collaboration opportunities.
56. The Project therefore intends on the production of a BNG assessment to measure and monitor the performance of the Project on biodiversity using widely accepted metric measurement tools. The approach and methods used will be tailored to suit the nature of the Project by making a series of assumptions, which are clearly set out in this report (Section 3.1 below).
57. The approach and assumptions set out in this report outlines those to be carried forward and supersedes prior iterations.

3.1 BNG Process

58. This section outlines the process to be followed in calculating BNG performance of the Project.
59. The UK Habitat Survey Data and condition assessment data is downloaded from ArcGIS Fieldmaps, and then input into ArcGIS Pro. The data is then clipped to the Project's Order Limits, and a check is completed so that all required attributes are populated, this includes, UK Habitat types, condition assessments and strategic significance. The UK Habitat types are then converted to the BNG Metric Habitat types, this is done via the conversions included in the Metric, with guidance from suitably experienced SLR Ecologists, or the relevant field surveyors, for any habitats that are not included within the Metric. These converted data form the basis of the "pre-development" or baseline habitats.
60. The "post-development" layer is created by splitting the baseline habitat data into the proposed infrastructure and development types. This provides detail on the type of impact that each habitat area would be subject to, such as:
    - habitat creation enhancement and planting areas;
    - areas of retained habitat;
    - areas for permanent habitat loss; and,
    - areas for temporary habitat loss and re-instatement.
61. In the "post-development" layer any habitat type changes resulting from impacts from the project are accounted for, including habitat loss and degradation, e.g. any predicted changes in habitat condition. At this stage of the Project, the "post-development" layer is subject to a degree of uncertainty, commensurate with the design stage and requirements for flexibility. Therefore, the Applicant will finalise the details of the "post-development" layer at the detailed

design stage.

62. The final step is to combine the baseline and post-development layers into a layer that details what the baseline habitat is, the impact it is subject to, and then its post development habitat type. All relevant data, for each habitat stand, are then inputted into a biodiversity gain statutory metric tool, with a row allocated for each habitat stand, subdivided where appropriate to account for post-development changes. The Project has been split into individual segments of the route (see Table 1.1), so that each segment generates its own BNG assessment. The final BNG Design Stage Report will provide a sum of each segment report to provide an overall Project BNG appraisal.

3.1.1 Baseline Habitats

63. UKHab and condition assessment data was collected during field surveys in 2023 and will form the basis for the quantification of the biodiversity value of baseline habitats, i.e. biodiversity units, as defined within the Statutory metric. A description of the field survey approach is provided in Section 2.4 of this report.

64. Full description of the baseline habitats within the Order Limits are provided within Appendix 21.1 (Document Reference 6.3.21.1). This report, alongside Chapter 21 (Document Reference: 6.1.21), details the locations of any habitats that are important ecological features, such as designated sites, priority habitats or habitats that are of value to protected and notable species.

65. A map of baseline habitats within the site boundary for the BNG assessment is provided in Figure 21.2.1 UK Habitat Survey Results within Appendix 21.2 (Document Reference 6.3.21.2).

3.1.2 Field Data GIS Cleaning and Processing

66. Prior to input into the metric, GIS data is taken through a process of cleaning to identify any errors both spatially and any errors in the content. Checks are made to identify any potential gaps and overlaps on the raw data from the field. Spatial data was cleaned and refined by an experienced GIS analyst, e.g. clipping polygons to intersections and removing duplications, with any larger erroneous data reviewed by an ecologist. Once the checked and refined data is loaded into the data schema, a standardised database structure for BNG assessments, it is then ran through a validation check to ensure data is correct as governed by the data rules set by the metric. For example, check that certain habitat types have the correct condition assessment.

3.1.3 Post-Development Habitats

67. It is assumed that, post-development, habitats classified as “temporary loss” would be cleared, but then will be reinstated to their former habitat type and condition within an acceptable timeframe.

68. A map of post-development habitats for the purposes of the BNG assessment will be provided in the final design stage report.

3.2 BNG Assumptions

69. In the process outlined in Section 3.1 above, a number of assumptions are required to be implemented. These are described in the following sections. Their significance in relation to BNG rules, principles and best practice guidance is explored in Section 4.

3.2.1 Classification of Permanent Loss

70. Some impacts of the Project relate to permanent loss of habitats: post-development, the habitats created will differ from their baseline type and/ or condition. Areas identified as "current permanent loss" in the design will be entered into the metric as habitats scoring zero value.

3.2.2 Classification of Temporary Loss - Retained

71. For the Project, many of the activities associated with habitat disturbance are anticipated to take place over a short duration. Specifically, this is taken to cover activities of fencing off land, digging trenches, laying the cables, and then reinstating earth in the trench, restoring the land to its previous use, and removing fencing. These activities would occur over a short space of time and in short geographic lengths, with the land being subject to cable laying sequentially over the project duration.
72. Other activities associated with the Project are also likely to be temporary in nature, but their timing within the Project duration is not yet finalised at this stage. This includes cable feeding processes at joint bays and link boxes: trenches again are only expected to remain open for a matter of weeks whilst this work takes place before soils being reinstated.
73. It is assumed that for the purposes of calculating the time of a temporary impact or habitat loss for a particular habitat parcel or feature, this impact is deemed to occur upon commencement of pre-construction works.
74. The Statutory Biodiversity Metric User Guide defines "temporary loss" as where the restoration of a habitat to its baseline type and baseline condition is within two years of the date of initial impact. Habitats meeting these criteria do not need to be recorded as lost. These habitats can be enhanced, although the appropriate delay function should be applied.
75. Whether an activity can be deemed as a "temporary impact" in BNG terms as above relates to the capacity to reinstate the affected habitat to its baseline type and condition. Technical data in the Metric (Tab G-4 Temporal Multipliers) specifies the time taken for a particular habitat to reach its intended condition. For habitats with a "time to target condition" that exceeds two years, it is not realistic to enter them into the Metric calculations as "retained" habitats for the Project. This approach will be applied to the post-development dataset.
76. Thus, for the Project, parcels of land have been deemed to be "retained" in Metric terms where they meet two criteria:
    1. The habitats being impacted can be restored to their original type and condition within a two-year timeframe, according to Metric Temporal Multipliers; and,
    2. The activity impacting the habitat is temporary in nature, i.e. physical works are

completed within a two-year timeframe, according to Project implementation plans.

77. Habitats anticipated to be subject to trenchless techniques, i.e. those habitats above the drill zones, are all processed in the Metric as "retained", as impacts are deemed to be temporary and not affect habitat type or condition.

78. In very specific cases, it is possible that a habitat may be "temporarily lost" and then restored and then subject to another impact and restored again before the completion of the project. This can only apply for habitat types and condition with a 1-year temporal multiplier, for example cropland subject to an interim restoration to fallow grass or green manure.

3.2.3 Classification of Temporary Loss – Lost and Reinstated

79. Parcels of land that do not meet the criteria outlined in Section 3.2.2 above, and also are not related to permanent loss of habitats, are processed in the Metric as lost and then reinstated to their original habitat type and condition.

80. For example, habitat loss associated with the haul road, that will remain operational for the duration of construction (up to 51 months) but will then be dismantled and land reinstated back to its original habitat type and condition.

3.2.4 Metrics and Local Authority Boundaries

81. BNG will be considered at a Project-scale rather than Local Authority scale. BNG Metrics will be run for each segment as outlined in Section 1.1.1. It is deemed appropriate in this instance to not run BNG Metrics for each LPA as the impacts from the Project will be dealt with on a Project-wide basis, rather than Local Authority basis, and this extends to consideration of BNG.

82. The Project spans two National Character Areas (NCA): Lincolnshire Coast and Marshes (42), and The Fens (46). The Statutory Biodiversity Metric applies a spatial risk multiplier, i.e. discounting the value of Biodiversity Units, where habitat creation or enhancement is provided outside either the LPA boundary and/ or a NCA. Due to the linear nature of the project, the Project has determined that NCA are the appropriate boundaries for targeting habitat creation and enhancement delivery. As the two NCAs where habitat creation or enhancement will be delivered are adjacent, and Project covers both these NCAs, it is proposed that the spatial risk multipliers relating to habitat compensation are not applied to this Project.

3.2.5 UKHab to Biodiversity Metric Habitat Conversion

83. Habitat types have been assigned a BNG Metric habitat classification based on their UK Habitat Classification Primary Code (and Secondary code, where relevant). In some instances, a direct walkover between the two habitat systems was not possible[8]. In this case, habitats have been assigned to the nearest matching BNG Metric classification based on professional judgement. To ensure transparency, where a conversion occurs, data changes will be logged in the User Comments of the completed baseline tabs (A1, B1 and C1) in the Statutory Biodiversity Metric calculator tool for the Project. A full list of these instances is provided in Table 3.1 below.

[8] The metric is based upon UKHab Primary Hierarchy Level 4 for the majority of terrestrial habitats, but deviates from this habitat schema in freshwater and inter-tidal habitats.

Table 3.1 UK Habitat to BNG Metric Habitat Conversion

Primary Code (recorded in UKHab baseline survey)	Broad BNG Habitat	BNG Habitat
c1	Cropland	Cereal crops
c1a	Cropland	Arable field margins tussocky
c1a5	Cropland	Arable field margins tussocky
c1c	Cropland	Cereal crops
c1c5	Cropland	Winter stubble
c1c6	Cropland	Cereal crops
c1c7	Cropland	Cereal crops
.	Cropland	Non-cereal crops
c1d8	Cropland	Non-cereal crops
f2	Wetland	Reedbeds
f2e	Wetland	Reedbeds
g3	Grassland	Other neutral grassland
g3c (and all sub-types)	Grassland	Other neutral grassland
g4	Grassland	Modified grassland
h3	Heathland and shrub	Mixed scrub
h3a	Heathland and shrub	Blackthorn scrub
h3c	Heathland and shrub	Other sea buckthorn scrub
h3c5	Heathland and shrub	Dunes with sea buckthorn (H2160)
h3f	Heathland and shrub	Hawthorn scrub
h3h	Heathland and shrub	Mixed scrub
r (standing water)	Lakes	Ornamental lake or pond
r (rivers and streams)	Watercourse footprint	Watercourse footprint
r1a	Lakes	Ponds (priority habitat)
r1 19	Lakes	Ponds (priority habitat)
r2b	Watercourse footprint	Watercourse footprint
s3a	Sparsely vegetated land	Coastal sand dunes
s3a5	Sparsely vegetated land	Coastal sand dunes
t1d	Rocky shore	Features of littoral rock
t2	Intertidal sediment	Littoral mud
t2d	Intertidal sediment	Littoral mud
u1	Urban	Developed land; sealed surface
u1b (u1b5 and u1b6)	Urban	Developed land; sealed surface
u1c	Urban	Artificial unvegetated, unsealed surface
u1d	Urban	Artificial unvegetated, unsealed surface
w1	Woodland and forest	Other woodland; broadleaved

3.2.6 Strategic Significance

84. The definition of "Strategic Significance" has been refined in the Statutory Metric and represents a multiplier for habitats based on its location and habitat type. As no Local Nature Recovery Strategy has been published and no documents have yet been identified by the local authorities as being relevant for assigning strategic significance, only medium and low strategic significance will be applied (following the guidance set out in Table 8 of the Statutory Biodiversity Metric User Guide (DEFRA, Feb 2024)). In the event that an LNRS or other relevant documents are published in time for the post-DCO design stage BNG report, this approach will be reviewed.

85. The method employed to assign strategic significance values to habitats is provided in Table 3.2.

Table 3.2: Assessment of Strategic Significance

Significance	Habitats Identified
High	▪ Not applicable – no documents specified by the relevant LPAs.
Medium	Parcels that fall within the below areas: ▪ Areas immediately adjacent to designated sites for nature conservation (e.g. SSSI, NNR, SPA, SAC, LNR, LWS and Nature Reserve managed by conservation NGO's), with potential to support the features of interest of the site or buffer impacts (unrelated to the Project) to it/them. ▪ Areas which meet local LWS selection criteria but are not designated as such. ▪ Green Infrastructure which, within the East Lindsey Core Strategy (SP24 and SP25) is taken to include (but by no means exclusively) 'woodland, parks, green lanes, public rights of way, churchyards, sports facilities, water courses, beaches and dunes.' ▪ Green Infrastructure is also identified in the South East Lincolnshire Local Plan – Policy 28. Within Policy 28, it is stated that Nature Improvements Areas will create 'joined up and resilient ecological networks at the landscape scale' in the future. ▪ Areas of land identified in Natural England's habitat network mapping data including information on habitat restoration-creation, restorable habitat, plus fragmentation action, and network enhancement and expansion zones where the habitats proposed are ecologically relevant in the specific location.
Low	All remaining parcels not included in the above.

86. The method above makes reference to the following documents:

- South East Lincolnshire Local Plan 2011-2036;
- East Lindsey Local Plan Core Strategy 2018;
- Lincolnshire Nature Strategy 2011;
- Lincolnshire Biodiversity Action Plan (BAP) (2011-2020);

- Black Sluice Drainage Board BAP May 2014;
- Lindsey Marsh Drainage Board BAP March 2010;
- Welland and Deepings IDB BAP 2020;
- Witham Fourth IDB BAP 2022;
- National Character Area (Natural England ArcGIS Website) 42: Lincolnshire Coast and Marshes;
- National Character Area 46: The Fens;
- Humber Estuary to Gibraltar Point Shore Management Plan;
- The Wash Shoreline Management Plan 2: Gibraltar to Old Hunstanton (East Anglia Coastal Group, 2010); and
- Natural England's habitat network mapping data (Natural England, 2023a).

3.2.7 National Grid Substation

87. The Connection Area is an indicative search area for the National Grid substation (NGSS) and is included within the Project's Order Limits for the 400kV cable corridor which will ultimately connect to the NGSS. The NGSS will be developed and consented by the National Grid; the Connection Area (where the 400kV cable corridor is considered to terminate) will therefore be excluded completely from BNG metric calculations until such time that the specific location of the 400kv cable corridor within the Connection Area is known.

3.2.8 Onsite/Offsite Classification

88. All areas included within the Order Limits are classed as "onsite" and is inputted into the relevant onsite metric tabs.
89. The mitigation planting is classified as "offsite" and is inputted into the relevant offsite metric tabs. A map showing the offsite and onsite areas will be provided in the final design stage BNG Report (based on the detailed engineering designs).

3.2.9 Habitat Monitoring and Management

90. All area habitats, excluding cropland, agricultural grassland, hedgerows and watercourses, will be subject to a 30-year monitoring and management plan to be agreed with the landowner.
91. After reinstatement, cropland and agricultural grassland will be subject to no monitoring or management. This is consistent with current BNG practice, which has not included cropland from the Habitat management and monitoring template (Natural England, 2023).
92. Hedgerows and watercourses will be subject to post re-instatement visits to ensure successful establishment of habitat up to 5 years after scheme completion. Thereafter, management will be transferred back to the landowner, who shall continue to maintain them in accordance with traditional practices. These habitats will be specifically excluded from the 30-year monitoring and management plan to avoid issues around funding additionality for hedgerow management under agri-environment schemes.

3.2.10 Greater Frampton Vision – RSPB

93. The Project is seeking ways to support the RSPB deliver their Greater Frampton Vision.
94. In some instances, the reinstatement of habitats post-Project within the RSPB's Greater Frampton Vision area may be contrary to their conservation strategy for the wider landscape.
95. An example of this is the reinstatement of hedgerow habitats in this area, where RSPB's conservation strategy is to remove hedgerows in their vision area. For these cases, the Project will liaise directly with RPSB to seek alignment of approaches. The Project remains committed to reinstating all habitats temporarily lost during-construction, but the location of some of these may be altered based on continued stakeholder engagement in relation to the Greater Frampton Vision.

4 BNG Rules, Principles, and Good Practice

96. As outlined in Section 2.2, use of the Metric is guided by a set of principles and rules. These include rules and principles listed in the Good Practice Principles for BNG prepared by CIEEM, CIRIA and IEMA (see Section 2.2.2) and the Statutory Biodiversity Metric User Guide.
97. Table 4.1 below outlines the application of these rules and principles to the Project and details how each has been considered.

Table 4.1 Application of BNG Rules, Principles and Good Practice Guidance to the Project

Rule/Principle and source	Principle detail	ODOW Project detail
Principle 1 (Best practice principles)	**Apply the Mitigation Hierarchy:** Avoid and then minimise impacts on biodiversity. As a last resort, and in agreement with stakeholders and decision-makers, compensate for losses that cannot be avoided.	Evidence of Project application of the Mitigation Hierarchy is provided in Chapter 21 (Document Reference 6.1.21).
Principle 2 (Best practice principles)	**Avoid losing biodiversity that cannot be offset by gains elsewhere**: Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset.	No irreplaceable habitats are impacted by the Project in relation to the BNG Assessment.
Principle 3 (Best practice principles)	**Be inclusive and equitable:** Engage stakeholders in designing, implementing, monitoring, and evaluating the approach to Net Gain. Share the benefits fairly among stakeholders.	Consultation is a key part of the Development Consent Order (DCO) application process. Consultation regarding Onshore Ecology, which included consultation in relation to BNG, has been conducted through the following processes: ▪ Evidence Plan Process (EPP) including Expert Technical Group (ETG) meetings; ▪ EIA scoping process (ODOW, 2022); ▪ Natural England's Discretionary Advice Service (DAS); ▪ Section 47 consultation process (all public consultation phases including phase 1 and 1a); and, ▪ Section 42 consultation process (including Phase 2 Consultation, Autumn

Rule/Principle and source	Principle detail	ODOW Project detail
		Consultation and Targeted Winter Consultation).
Principle 4 (Best practice principles)	**Address risks:** Mitigate difficulty and/or uncertainty using well-accepted ways to add contingency when calculating biodiversity losses and gains.	The habitat creation tab of the Metric uses in-built multipliers to address risk for calculating biodiversity gains, such as "time to target condition" and "difficulty of creation". Professional judgement will be applied to other project-specific risks and a precautionary approach taken. All identified risks will be detailed in relevant documentation supporting the BNG assessment.
Principle 5 (Best practice principles)	**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.	To present final metric outputs at design stage report. The Project is committed to pursuing opportunities to deliver net gain.
Principle 6 (Best practice principles)	**Achieve the best outcomes for biodiversity:** Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge.	Baseline data input for further iterations of the Metric, will use habitat data from the most recent field survey season (i.e., 2023), undertaken by suitably qualified ecologists and combined with desk-based data from local records centres. Data processing, analysis and reporting was completed by qualified GIS analysts under supervision of ecologists with BNG expertise. Habitat creation and enhancement approach has been guided by published strategies and through consultation with stakeholders.
Principle 7 (Best practice principles)	**Be additional:** Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e., do not deliver something that would occur anyway).	The Project will ensure any BNG measures are demonstrably additional to existing obligations.
Principle 8 (Best practice principles)	**Create a Net Gain legacy:** Ensure Net Gain generates long-term benefits.	Non-agricultural habitats will be secured through long-term habitat management plans (where relevant), and the Project will seek to feed into

Rule/Principle and source	Principle detail	ODOW Project detail
		the Greater Frampton Vision too, thus promoting a long-term legacy.
Principle 9 (Best practice principles)	**Optimise sustainability:** Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	Ways to maintain and enhance the natural environment were identified in the early stages of the Project and will feed into the resulting BNG assessment.
Principle 10 (Best practice principles)	**Be transparent:** Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	A previous version of this BNG Principles and Approach report was consulted on at the PEIR (ODOW, 2023). This report provides an update on that approach to ensure transparency with stakeholders.
Rule 1 (Statutory Biodiversity Metric User Guide)	The trading rules of this biodiversity metric must be followed.	Detailed results will be presented in the Design Stage Report.
Rule 2 (Statutory Biodiversity Metric User Guide)	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.	Detailed results will be presented in the Design Stage Report.
Rule 3 (Statutory Biodiversity Metric User Guide)	To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.	The February 2024 version of the Statutory Metric will be used for the Design Stage BNG Report.
Rule 4 (Statutory Biodiversity Metric User Guide)	In exceptional ecological circumstances, deviation from this metric methodology may be permitted by the relevant consenting body or planning authority. Any deviation must be fully justified and evidenced.	No deviations from published metric rules and methods have been identified in the current approach. The approach is detailed in this document to ensure transparency.

Rule/Principle and source	Principle detail	ODOW Project detail
Principle 1 (Statutory Biodiversity Metric User Guide)	The metric assessment should be completed by a competent person.	BNG assessment will be completed by adequately trained and competent consultant ecologists and GIS analysts, under supervision of experienced senior consultants. All reports and data will be subject to review and quality assurance checks throughout the process.
Principle 2 (Statutory Biodiversity Metric User Guide)	The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.	The Project is committed to ensuring that biodiversity net gain measures are additional to existing statutory obligations, biodiversity protections and policy requirements and that evidence of this additionality will be transparently reported in the Design Stage BNG Report.
Principle 3 (Statutory Biodiversity Metric User Guide)	This metric should be used in accordance with established good practice guidance and professional codes.	This table evidences the Project's consideration of good practice guidance in relation to biodiversity net gain.
Principle 4 (Statutory Biodiversity Metric User Guide)	This metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.	See Principle 1 above, specialist ecological advice has been provided throughout the project and not solely in relation to BNG.
Principle 5 (Statutory Biodiversity Metric User Guide)	Biodiversity units are a proxy for biodiversity and should be treated as relative values.	Biodiversity, and potential impacts to it from the Project, is also considered within Chapter 21 (Document Reference 6.1.21).
Principle 6 (Statutory Biodiversity Metric User Guide)	This metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.	Local and regional guidance, policies and plans have been consulted in the BNG process to inform the assessment.
Principle 7 (Statutory Biodiversity Metric User Guide)	Habitat interventions need to be realistic and deliverable within a relevant project timeframe.	The project timeline and process has been used to inform the BNG process, so that habitat plans are realistic, for example BNG assumptions in relation to temporary and permanent impacts (Section 3.2.3).
Principle 8	Created and enhanced habitats should seek, where practical and reasonable,	Delivery of BNG for the Project occurs through onsite provision, offsite

Rule/Principle and source	Principle detail	ODOW Project detail
(Statutory Biodiversity Metric User Guide)	to be local to any impact and deliver strategically important outcomes for nature conservation.	provision which is adjacent to the Project boundary, and through the Greater Frampton Vision, which is delivered locally.
Principle 9 (Statutory Biodiversity Metric User Guide)	The metric does not enforce a minimum habitat size ratio for compensation of losses. However, proposals should aim to: • maintain habitat extent (supporting more, bigger, better, and more joined up ecological networks); and • ensure that proposed or retained habitat parcels are of sufficient size for ecological function.	Detailed design for habitat creation and enhancement is driven to deliver better connected habitat networks and areas of new habitat, in particular around the OnSS.

4.1 Additionality (BNG Good Practice Principle 7 and Metric Principal 2)

98. It is noted that much of the Order Limits falls within agricultural land. There is the opportunity to align BNG habitat delivery with other schemes, e.g. agri-environment schemes, that promote protection and enhancement of the natural environment.

99. Defra and Natural England have prepared guidance (Defra and Natural England, 2023) surrounding the concept of "additionality" and "stacking", which are of relevance to considering payment options for the management of parcels of land, and therefore which locations are subject to certain habitat management for the purposes of this BNG assessment.

100. The concept of "stacking" is when multiple credits or units from different nature markets can be sold separately from the same activity undertaken on a piece of land. For example, one habitat enhancement action can be eligible for both BNG credits and Nutrient credits (part of the Nutrient Neutrality process which is in operation in some catchments in England).

101. The concept of "additionality" is where a new credit scheme must demonstrate that an additional action has occurred on the land, compared to the ongoing actions already in place for other nature market schemes. For example, enhancement activities funded under agri-environment schemes cannot then be sold as a biodiversity unit.

102. The BNG approach set out in this document will be reviewed against existing agri-environment schemes and other nature-based funding that may or is occurring within the Project Order Limits so that any measures proposed for BNG purposes are additional to existing commitments for the same land.

5 Biodiversity Gain Outcomes

103. Detailed results from the Statutory Metric will be provided in the final design stage BNG report. The applicant is committed to providing these results in a transparent format, including completed Excel calculators, and supported by habitat condition assessment information and detailed baseline and post-development maps.

5.1 Offsite Requirements and Results

104. In accordance with the mitigation hierarchy, BNG should first be delivered on-site, near to where negative impacts occur, wherever possible. Every effort will be made to maximise the delivery of onsite BNG within each onshore segment (Table 1.1).

105. If there is a shortfall in overall biodiversity units from any metric type (habitat, hedgerow, or river), as a result of the Project, offsite habitat enhancement to deliver an overall net gain for the Project will be agreed and incorporated.

106. The delivery of offsite enhancements will be secured through an agreement between the Applicant, or it's agent and the landowner/responsible body.

5.2 Statutory Biodiversity Credit Purchase

107. It is uncertain if the project would qualify for purchase of Statutory credits, as the commitment to deliver 10% Net Gain is not yet a statutory requirement for NSIP projects. At this stage in the Project, it is considered unlikely that any statutory credits would be available or purchased in order to deliver BNG for the Project.

6 Conclusion

108. SLR has updated the BNG Principles and Approach, submitted as an appendix to the PEIR (ODOW, 2023) with reference to the Defra Statutory Biodiversity Metric published in February 2024 (Defra, 2024).

109. The proposed method has been outlined in Section 3.1 with the relevant assumptions set out in Section 3.2. This report is intended to inform the Examining Authority, LPAs, stakeholders, and other relevant parties as to the Project's proposed approach with regards to biodiversity gain, with reference to the statutory metric.

110. In line with Good Practice Guidance set out in Section 4, an assessment, following the principles and approach set out in this document, would be undertaken at the detailed design stage. Biodiversity gain calculations, using the Statutory Biodiversity Gain Metric, would be incorporated into a Biodiversity Gain Final Design Report.

References

Defra (2023) Nationally Significant Infrastructure: action plan for reforms to the planning process. Available at: https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-nsip-reforms-action-plan/nationally-significant-infrastructure-action-plan-for-reforms-to-the-planning-process [Accessed: January 2024]

Defra (2023a) *The biodiversity gain plan: draft template and guidance* https://www.gov.uk/government/publications/biodiversity-gain-plan [Accessed March 2024]

Defra (2024) *Statutory Biodiversity Metric Tools and Guides.* Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides [Accessed: February 2024]

Defra and Natural England (2023) Combining Environmental Payments: Biodiversity Net Gain (BNG) and Nutrient Mitigation. Available at: https://www.gov.uk/guidance/combining-environmental-payments-biodiversity-net-gain-bng-and-nutrient-mitigation [Accessed March 2024]

East Anglia Coastal Group (2010) The Wash Shoreline Management Plan 2: Gibraltar Point to Old Hunstanton. https://www.eastangliacoastalgroup.org/assets/img/1441136.pdf [Accessed March 2024]

Lincolnshire County Council (LCC) (2006). Biodiversity Action Plan - Find a freedom of information request. Available at: https://www.lincolnshire.gov.uk/directory-record/67699/biodiversity-action-plan [Accessed: September 2023]

Natural England (2021) *The Biodiversity Metric Supporting Documents (LP039).* Available at: https://publications.naturalengland.org.uk/publication/6049804846366720 [Accessed: October 2023]

Natural England (2023) Habitat Management and Monitoring Plan Template (JP055). Available at: https://publications.naturalengland.org.uk/publication/5813530037846016 [Accessed March 2024]

Natural England (2023a) Habitat Networks (England). Available at: https://www.data.gov.uk/dataset/0ef2ed26-2f04-4e0f-9493-ffbdbfaeb159/habitat-networks-england [Accessed March 2024]

Natural England ArcGIS Website https://naturalengland-defra.opendata.arcgis.com/datasets/national-character-areas-england/explore [Accessed March 2024]

Office of the Deputy Prime Minister (2005). ODPM Circular 06/2005. Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. Available at: https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005 [Accessed: January 2024]

Outer Dowsing Offshore Wind (ODOW) (2023) Preliminary Environmental Information Report. Available at: https://www.outerdowsing.com/consultation/ [Accessed: September 2023]

The Planning Inspectorate (2022) Scoping Opinion: Proposed Outer Dowsing Offshore Wind. Case Reference: EN10130.

UKHab Website. https://ukhab.org/ [Accessed March 2024]

7 Annex A Preliminary BNG Appraisal

Provisional BNG Summary Results

Section ID	Baseline BNG Area Units	Baseline BNG Hedgerow Units	Baseline BNG Watercourse Units	PM BNG Area Units	PM BNG Hedgerow Units	PM BNG Watercourse Units	Area Units Variation	Hedgerow Units Variation	Watercourse Units Variation
EC 1	578.60	4.07	64.66	575.08	3.54	54.96	-3.52	-0.53	-9.70
EC 2	124.21	4.18	26.66	117.86	3.98	24.91	-6.35	-0.20	-1.75
EC 3	75.77	1.54	15.14	73.88	1.54	14.62	-1.89	0.00	-0.51
EC 4	54.76	0.00	7.83	53.74	0.00	7.25	-1.02	0.00	-0.58
EC 5	157.83	1.65	42.17	145.78	1.43	35.69	-12.04	-0.22	-6.48
EC 6	69.76	0.88	22.68	68.32	0.88	21.92	-1.44	0.00	-0.76
EC 7	126.74	1.47	26.09	121.71	1.38	25.78	-5.04	-0.09	-0.31
EC 8	119.31	0.46	35.09	116.55	0.46	25.87	-2.76	0.00	-9.22
EC 9	149.84	0.73	30.49	145.84	0.73	29.59	-4.00	0.00	-0.91
EC 10	115.43	2.31	26.51	113.08	2.30	22.99	-2.35	-0.01	-3.52
EC 11	171.16	2.99	24.27	167.26	2.99	23.87	-3.90	0.00	-0.40
EC 12	117.55	2.33	24.18	102.73	2.11	22.64	-14.82	-0.23	-1.54
EC 13	158.58	0.13	16.06	91.13	0.13	8.50	-67.45	0.00	-7.56
EC 14	124.06	7.99	4.36	107.07	7.99	2.99	-16.99	0.00	-1.37
							-143.58	-1.28	-44.62

Headline Results

Scroll down for final results ⚠

Return to results menu

Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	578.60
	Hedgerow units	4.07
	Watercourse units	64.66
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	575.08
	Hedgerow units	3.54
	Watercourse units	54.96
On-site net change (units & percentage)	*Habitat units*	-3.52
	Hedgerow units	-0.53
	Watercourse units	-9.70
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-3.52
	Hedgerow units	-0.53
	Watercourse units	-9.70
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC1 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-3.52
	Hedgerow units	-0.53
	Watercourse units	-9.70
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.61%
	Hedgerow units	-13.12%
	Watercourse units	-15.00%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	578.60	636.46	61.38
Hedgerow units	10.00%	4.07	4.48	0.94
Watercourse units	10.00%	64.66	71.12	16.16

Headline Results

Scroll down for final results ⚠

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	124.21
	Hedgerow units	4.18
	Watercourse units	26.66
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	117.86
	Hedgerow units	3.98
	Watercourse units	24.91
On-site net change (units & percentage)	*Habitat units*	-6.35
	Hedgerow units	-0.20
	Watercourse units	-1.75
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-6.35
	Hedgerow units	-0.20
	Watercourse units	-1.75
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC2 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-6.35
	Hedgerow units	-0.20
	Watercourse units	-1.75
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-5.11%
	Hedgerow units	-4.81%
	Watercourse units	-6.58%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	124.21	136.63	18.77
Hedgerow units	10.00%	4.18	4.60	0.62
Watercourse units	10.00%	26.66	29.33	4.42

Headline Results

Scroll down for final results ⚠

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	75.77
	Hedgerow units	1.54
	Watercourse units	15.14
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	73.88
	Hedgerow units	1.54
	Watercourse units	14.62
On-site net change (units & percentage)	*Habitat units*	-1.89
	Hedgerow units	0.00
	Watercourse units	-0.51
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-1.89
	Hedgerow units	0.00
	Watercourse units	-0.51
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC3 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-1.89
	Hedgerow units	0.00
	Watercourse units	-0.51
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.49%
	Hedgerow units	0.00%
	Watercourse units	-3.40%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	75.77	83.34	9.47
Hedgerow units	10.00%	1.54	1.69	0.15
Watercourse units	10.00%	15.14	16.65	2.03

Headline Results

Scroll down for final results ⚠

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	54.76
	Hedgerow units	0.00
	Watercourse units	7.83
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	53.74
	Hedgerow units	0.00
	Watercourse units	7.25
On-site net change (units & percentage)	*Habitat units*	-1.02
	Hedgerow units	0.00
	Watercourse units	-0.58
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-1.02
	Hedgerow units	0.00
	Watercourse units	-0.58
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC4 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-1.02
	Hedgerow units	0.00
	Watercourse units	-0.58
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-1.87%
	Hedgerow units	0.00%
	Watercourse units	-7.47%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	54.76	60.23	6.50
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	7.83	8.62	1.37

Headline Results

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	157.83
	Hedgerow units	1.65
	Watercourse units	42.17
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	145.78
	Hedgerow units	1.43
	Watercourse units	35.69
On-site net change (units & percentage)	*Habitat units*	-12.04
	Hedgerow units	-0.22
	Watercourse units	-6.48
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-12.04
	Hedgerow units	-0.22
	Watercourse units	-6.48
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC5 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-12.04
	Hedgerow units	-0.22
	Watercourse units	-6.48
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-7.63%
	Hedgerow units	-13.31%
	Watercourse units	-15.38%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	157.83	173.61	27.83
Hedgerow units	10.00%	1.65	1.82	0.38
Watercourse units	10.00%	42.17	46.39	10.70

Headline Results

Scroll down for final results ⚠

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	69.76
	Hedgerow units	0.88
	Watercourse units	22.68
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	68.32
	Hedgerow units	0.88
	Watercourse units	21.92
On-site net change (units & percentage)	*Habitat units*	-1.44
	Hedgerow units	0.00
	Watercourse units	-0.76
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-1.44
	Hedgerow units	0.00
	Watercourse units	-0.76
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC6 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-1.44
	Hedgerow units	0.00
	Watercourse units	-0.76
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.07%
	Hedgerow units	0.00%
	Watercourse units	-3.36%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	69.76	76.74	8.42
Hedgerow units	10.00%	0.88	0.97	0.09
Watercourse units	10.00%	22.68	24.95	3.03

Headline Results

Scroll down for final results ⚠

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	126.74
	Hedgerow units	1.47
	Watercourse units	26.09
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	121.71
	Hedgerow units	1.38
	Watercourse units	25.78
On-site net change (units & percentage)	*Habitat units*	-5.04
	Hedgerow units	-0.09
	Watercourse units	-0.31
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-5.04
	Hedgerow units	-0.09
	Watercourse units	-0.31
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC7 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-5.04
	Hedgerow units	-0.09
	Watercourse units	-0.31
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-3.97%
	Hedgerow units	-6.23%
	Watercourse units	-1.21%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	126.74	139.42	17.71
Hedgerow units	10.00%	1.47	1.62	0.24
Watercourse units	10.00%	26.09	28.70	2.92

Headline Results

Scroll down for final results ⚠

Return to results menu

Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	119.31
	Hedgerow units	0.46
	Watercourse units	35.09
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	116.55
	Hedgerow units	0.46
	Watercourse units	25.87
On-site net change (units & percentage)	*Habitat units*	-2.76
	Hedgerow units	0.00
	Watercourse units	-9.22
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.76
	Hedgerow units	0.00
	Watercourse units	-9.22
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC8 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.76
	Hedgerow units	0.00
	Watercourse units	-9.22
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.31%
	Hedgerow units	0.00%
	Watercourse units	-26.29%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	119.31	131.24	14.69
Hedgerow units	10.00%	0.46	0.51	0.05
Watercourse units	10.00%	35.09	38.60	12.73

Headline Results

Scroll down for final results ⚠

Return to results menu

Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	149.84
	Hedgerow units	0.73
	Watercourse units	30.49
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	145.84
	Hedgerow units	0.73
	Watercourse units	29.59
On-site net change (units & percentage)	*Habitat units*	-4.00
	Hedgerow units	0.00
	Watercourse units	-0.91
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-4.00
	Hedgerow units	0.00
	Watercourse units	-0.91
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC9 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-4.00
	Hedgerow units	0.00
	Watercourse units	-0.91
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.67%
	Hedgerow units	0.00%
	Watercourse units	-2.97%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	149.84	164.83	18.99
Hedgerow units	10.00%	0.73	0.80	0.07
Watercourse units	10.00%	30.49	33.54	3.96

Headline Results

Scroll down for final results ⚠

Return to results menu

Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	115.43
	Hedgerow units	2.31
	Watercourse units	26.51
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	113.08
	Hedgerow units	2.30
	Watercourse units	22.99
On-site net change (units & percentage)	*Habitat units*	-2.35
	Hedgerow units	-0.01
	Watercourse units	-3.52
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.35
	Hedgerow units	-0.01
	Watercourse units	-3.52
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC10 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.35
	Hedgerow units	-0.01
	Watercourse units	-3.52
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.04%
	Hedgerow units	-0.27%
	Watercourse units	-13.27%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	115.43	126.98	13.90
Hedgerow units	10.00%	2.31	2.54	0.24
Watercourse units	10.00%	26.51	29.16	6.17

Headline Results

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	171.16
	Hedgerow units	2.99
	Watercourse units	24.27
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	167.26
	Hedgerow units	2.99
	Watercourse units	23.87
On-site net change (units & percentage)	*Habitat units*	-3.90
	Hedgerow units	0.00
	Watercourse units	-0.40
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-3.90
	Hedgerow units	0.00
	Watercourse units	-0.40
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC11 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-3.90
	Hedgerow units	0.00
	Watercourse units	-0.40
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-2.28%
	Hedgerow units	0.00%
	Watercourse units	-1.63%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	171.16	188.28	21.02
Hedgerow units	10.00%	2.99	3.29	0.30
Watercourse units	10.00%	24.27	26.69	2.82

Headline Results

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	117.55
	Hedgerow units	2.33
	Watercourse units	24.18
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	102.73
	Hedgerow units	2.11
	Watercourse units	22.64
On-site net change (units & percentage)	*Habitat units*	-14.82
	Hedgerow units	-0.23
	Watercourse units	-1.54
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-14.82
	Hedgerow units	-0.23
	Watercourse units	-1.54
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC12 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-14.82
	Hedgerow units	-0.23
	Watercourse units	-1.54
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-12.61%
	Hedgerow units	-9.69%
	Watercourse units	-6.37%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	117.55	129.30	26.57
Hedgerow units	10.00%	2.33	2.57	0.46
Watercourse units	10.00%	24.18	26.60	3.96

Headline Results

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	158.58
	Hedgerow units	0.13
	Watercourse units	16.06
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	91.13
	Hedgerow units	0.13
	Watercourse units	8.50
On-site net change (units & percentage)	*Habitat units*	-67.44
	Hedgerow units	0.00
	Watercourse units	-7.56
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-67.44
	Hedgerow units	0.00
	Watercourse units	-7.56
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC13 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-67.44
	Hedgerow units	0.00
	Watercourse units	-7.56
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-42.53%
	Hedgerow units	0.00%
	Watercourse units	-47.10%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	158.58	174.43	83.30
Hedgerow units	10.00%	0.13	0.15	0.01
Watercourse units	10.00%	16.06	17.67	9.17

Headline Results

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Errors flagged below - please investigate further ▲

On-site baseline	*Habitat units*	124.06
	Hedgerow units	7.99
	Watercourse units	4.36
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	107.07
	Hedgerow units	7.99
	Watercourse units	2.99
On-site net change (units & percentage)	*Habitat units*	-16.99
	Hedgerow units	0.00
	Watercourse units	-1.37
Off-site baseline	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-16.99
	Hedgerow units	0.00
	Watercourse units	-1.37
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

ECC14 Preliminary RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-16.99
	Hedgerow units	0.00
	Watercourse units	-1.37
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-13.70%
	Hedgerow units	0.00%
	Watercourse units	-31.46%
Trading rules satisfied?		No - Check Trading Summaries ▲

You must specify if irreplaceable habitats are on-site at baseline ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	124.06	136.46	29.40
Hedgerow units	10.00%	7.99	8.78	0.80
Watercourse units	10.00%	4.36	4.79	1.81