

Flaxlands Solar Farm

Biodiversity Net Gain Assessment

Ampyr Solar Europe

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Prepared for:

Ampyr Solar Europe

Prepared by:

AECOM Limited

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1. Introduction

AECOM was commissioned by Ampyr Solar Europe (the 'Applicant') to undertake a Biodiversity Net Gain (BNG) assessment in support of the planning application for Flaxlands Solar Farm. The Proposed Development comprises the installation of a 49.9 MW solar photovoltaic (PV) array and associated infrastructure, including a Battery Energy Storage System (BESS).

The Proposed Development is located approximately 1.7 km north of Royal Wootton Bassett and 3.2 km west of Swindon, Wiltshire, centred on Ordnance Survey National Grid Reference (NGR) SU 06910 85466. The area within the red line planning boundary is hereafter referred to as the 'Site', and is illustrated in Appendix A.

This BNG assessment quantifies the anticipated impact of the Proposed Development on biodiversity by comparing the baseline condition of habitats within the Site to the post-development scenario. The assessment considers habitat loss, retention, enhancement, and creation, and is undertaken using the Statutory Biodiversity Metric¹ (SBM), in accordance with the SBM User Guide² and BNG good practice principles³.

1.1 Site Description

The Site, indicated by the red line boundary on the 'Baseline Habitat Plan' (Appendix A), covers approximately 87 hectares and comprises two land parcels, connected by Flaxlands Lane which runs from south-west to north-east through the area. The Site supports the following broad habitat types:

- Grassland
- Heathland and shrub
- Lakes
- Woodland and forest
- Individual trees
- Hedgerows
- Ditches

The surrounding landscape is dominated by agricultural grassland. The M4 motorway lies approximately 150 m to the south, separating the Site from the built-up area of Royal Wootton Bassett.

The southern portion of the Site overlaps with Flaxlands Manor County Wildlife Site (CWS), while a second section of the CWS adjoins the northern Site boundary. The CWS is designated for its grassland habitats, including neutral pastures and hay meadows. However, National Vegetation Classification (NVC) surveys undertaken by AECOM⁴ recorded modified grassland and other neutral grassland in the southern portion of the CWS.

1.2 Proposed Development

The Proposed Development involves the installation of a 49.9 MW solar array and associated BESS. Solar photovoltaic arrays will be situated in both land parcels, and the BESS located in the north of the Site. The lifetime of the Proposed Development is anticipated to be 40 years and is therefore considered permanent for the purpose of this BNG assessment. The Outline Landscape Masterplan⁵ has been used to inform this assessment; the 'Post-Development Habitat Plan' visualises this and is provided in Appendix B.

It is understood that the Proposed Development will require clearance of vegetation, creation of access tracks for vehicles and machinery to access working areas and widening of gaps within hedgerows for access. Existing hedgerow gaps will be utilised for access as far as possible. The design describes access routes as 'access road' and 'perimeter track'. It is understood that the access roads will be constructed of an artificial unsealed surface

¹ DEFRA (2023). [The Statutory Biodiversity Metric](#)

² DEFRA (2023). [The Statutory Biodiversity Metric User Guide](#)

³ CIEEM, IEMA & ciria (2019). [Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide](#)

⁴ AECOM (2024). Flaxlands Solar Farm – National Vegetation Classification Report.

⁵ AECOM (2025). Flaxlands Solar Farm – Outline Landscape Masterplan.

(e.g. aggregate) and will be suitable for the use of heavy goods vehicles for the duration of the construction phase. They will remain in place for the lifetime of the Proposed Development and are considered a permanent feature. Perimeter tracks will be utilised by smaller vehicles, to transport items and workers throughout the Site. Perimeter tracks will be either compressed earth (seeded as grassland) or (if required, e.g. land is too soft / muddy for use by an offroad vehicle) constructed with a 'no dig method' through the placing of crushed stone and are therefore also considered permanent.

A construction compound will be located within the north of the Site, to enable transport throughout the Site. It is assumed that all vegetation will be cleared under the footprint of the compound, though this will not require the removal of any hedgerow or broadleaved trees. No artificial lighting will be required at the construction compound. This compound will be present for the duration of construction (six months).

1.3 Policy Context

1.3.1 National Legislation

It is Government policy that *"planning decisions should minimise impacts on and provide net gain for biodiversity"*⁶. As of 12 February 2024, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990⁷ (as inserted by Schedule 14 of the Environment Act 2021⁸). This requires all relevant developments (with a few exemptions⁹) to achieve a minimum 10% net gain in biodiversity units relative to the Site's baseline biodiversity value.

1.3.2 Local Planning Policy

The Wiltshire Core Strategy¹⁰ includes Core Policy 50 – Biodiversity and geodiversity, which requires proposals to retain, buffer, and manage ecological features. Where this is not possible, development must minimise impacts and secure appropriate compensation to avoid a net loss of biodiversity. Major developments are expected to deliver biodiversity enhancements, contribute to ecological networks, and align with local Biodiversity Action Plans and River Basin Management Plans.

⁶ UK Government (2023). [National Planning Policy Framework](#)

⁷ UK Government (2024). [Environment Act – Schedule 14](#).

⁸ UK Government (2021). [Environment Act 2021](#)

⁹ UK Government (2024). [Biodiversity Net Gain: Exempt Developments](#).

¹⁰ Wiltshire Council (2015). [Wiltshire Core Strategy](#).

2. Methodology

2.1 Statutory Biodiversity Metric

A BNG assessment involves making a comparison between the biodiversity value of habitats present within the Site prior to development (i.e., the 'baseline') and the predicted biodiversity value of habitats following the completion of the development (i.e., 'post-development'). The comparison is made in terms of 'biodiversity units', with a 'biodiversity metric' providing the mechanism to allow biodiversity values to be calculated and compared.

The SBM calculates the overall loss or gain of biodiversity of development projects by assessing the distinctiveness (i.e., type of habitat and its value), condition, extent, and strategic significance of habitats on site pre- and post-development, including both permanent and temporary land-take areas. To achieve a BNG, the biodiversity unit score must have a post-development score higher than the baseline score.

When calculating the post-development biodiversity units, the SBM includes a series of standard 'risk multipliers' to account for the inherent risk of creating and restoring habitats, the time taken to establish habitats and the location of the mitigation in relation to the habitats lost on site. The risk multipliers have the effect of reducing the value of the proposed habitats, which means larger areas, habitats of higher distinctiveness, and/or conditions are required to mitigate losses and achieve net gain.

The SBM is guided by the following set of rules set out in Table 1. If these rules are not followed, BNG as defined by the Environment Act⁶ cannot be justified.

Table 1. SBM Rules

Rule	Explanation
Rule 1 – Trading rules	The trading rules are rules that try to prevent the 'trading down' of habitat distinctiveness. Under the trading rules, losses of habitat are to be compensated for on a "like for like" or "like for better" basis.
Rule 2 – The requirement to deliver at least a 10% net gain applies to each type of unit present on the Site	The SBM assesses and generates separate outputs for area habitats (measured in habitat units) and linear habitats, including hedgerows (measured in hedgerow units) and watercourses (measured in watercourse units). To claim a net gain in biodiversity, there must be an increase across all area, hedgerow and watercourse units, the units cannot be summed to give an overall biodiversity unit value, i.e. an increase in area and hedgerow units cannot be used to offset a loss in watercourse units.
Rule 3 – Use of SBM	Assessment must use the latest version of the SBM released by DEFRA.
Rule 4 – Exceptional circumstances required Local Planning Authority (LPA) engagement	In exceptional ecological circumstances, deviation from the SBM methodology may be permitted by the relevant planning authority.

The information required to undertake the BNG calculation is described below.

2.1.1 Baseline Data

The following data have been utilised to determine the Site's baseline area, hedgerow and watercourse habitats, and is collectively hereafter referred to as the 'baseline' data:

- UKHab¹¹ data and condition assessment (as outlined in the SBM Condition Assessment Sheets¹², details regarding this are outlined in Appendix C.1) collected by AECOM to inform the Preliminary Ecological Appraisal¹³ (PEA) in May 2024;
- National Vegetation Classification (NVC) survey was undertaken within and adjacent to the Site in June 2024⁴ to confirm the presence, extent and condition of priority grassland habitats within and adjacent to the Site boundary;
- A Modular River Survey (MoRPh) survey was carried out in October 2024 to identify the baseline watercourse habitats; and

¹¹ UKHab Ltd (2023). *UK Habitat Classification Version 2.0* online at [UK Habitat Classification](#).

¹² DEFRA (2024). *Statutory Biodiversity Metric Condition Assessments*.

¹³ AECOM (2024). Flaxlands Solar Farm – Preliminary Ecological Appraisal.

- An arboricultural assessment was undertaken by the AECOM arboricultural team in August-September 2024¹⁴, this has been consulted to confirm the number and location of veteran trees within the Site.

All data has been digitised in Geographic Information System (GIS) to provide area and length measurements of each habitat type. The data was aggregated and entered into the SBM to calculate the baseline biodiversity units.

2.1.2 Post-Development Data

The Outline Landscape Masterplan⁵ has been used to determine the extent and type of habitats to be retained, created and enhanced post-development. Habitats described were converted to UKHab Classification categories¹¹, see Appendix D.

These plans were then digitised into GIS to produce the 'Post-Development Habitat Plan' (Appendix B). Target condition scores for the proposed habitats were selected in accordance with the SBM User Guide², and SBM Condition Assessment Sheets using professional judgement to ensure the condition scores selected were realistic. The rationale behind target conditions assigned is provided in Appendix C.2. This data was utilised to predict the post-development biodiversity units.

2.1.3 Habitat Distinctiveness

Habitat distinctiveness is a measure based on the type of habitat and its distinguishing features. Habitats of higher distinctiveness are typically rarer, more valuable, harder to recreate if impacted and are typically considered priority habitats. Habitats of lower distinctiveness are more common and are easier to recreate if impacted. Habitat distinctiveness ranges from 'Very High', 'High', 'Medium', 'Low' and 'Very Low'.

2.1.3.1 Trading Rules

DEFRA define the trading rules as: *"minimum habitat creation and enhancement requirements to compensate for specific habitat losses, up to the point of no net loss. They are based on the habitat type and distinctiveness of the lost habitat"*¹². Trading rules apply to all habitat modules, with the offsetting requirements differing for each. See Table 2 for a summary of these requirements.

Table 2. Trading Rules Summary

Habitat Distinctiveness	Area Habitats	Hedgerow Habitats	Watercourse Habitats
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 habitat 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 habitat units of either: 'Medium' distinctiveness habitat within the same broad habitat type or, any habitat of higher distinctiveness.	Losses must be replaced with hedgerow units of the same or of a higher band	Losses must be replaced with watercourse units of the same habitat type
Low	Losses must be replaced with area habitat units of the same or higher band	Losses must be replaced with hedgerow units of the same or of a 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 of a higher band	Not applicable

2.1.4 Strategic Significance

The SBM requires that the strategic significance (hereafter referred to as 'SS') of all baseline and post-development habitats be analysed, defined, and justified. SS is the local significance of a habitat based on its location.

¹⁴ AECOM (2024). Flaxlands Solar Farm – Tree Constraints Plan.

The Wiltshire and Swindon Local Nature Recovery Strategy¹⁵ (LNRS) is currently under review and set to be published later in 2025, the mapping associated with this is not yet available. Because of this, SS has been assigned to habitats using the alternative methodology, in line with guidance set out in the SBM User Guide², taking into consideration the LNRS draft measures¹⁶, though these may be subject to change. The process of how the SS of a habitat is assessed is shown in Table 3.

Table 3. Strategic Significance Guidance (no LNRS)

SS Category	Description
High	Where there is no published LNRS, assign 'High' SS if: - The habitat type is mapped and described as locally ecologically important within a specific location within documents specified by the relevant planning authority. - If the Proposed Development is proposed to contribute towards priorities or measures set out in the LNRS (or alternative strategy), assign 'Low' SS to the baseline habitat and 'High' SS to the proposed habitat.
Medium	Where no suitable document has been produced for assessing SS, 'Medium' SS should be assigned if: - It can be explained how the habitat type is ecologically important within a specific location. - It can be demonstrated the importance of that habitat in providing ecological linkage to other strategically significant locations. Medium SS may also be assigned utilising professional judgement where deemed appropriate.
Low	Where the definitions for 'High' SS is not met.

As part of this assessment, the following relevant documents were reviewed to determine the SS of the habitats on the Site:

- AECOM – Preliminary Ecological Appraisal¹³
- Wiltshire Council – Local Nature Recovery Strategy Measures¹⁶
- AECOM – Ecological Impact Assessment¹⁷
- Wiltshire Wildlife Trust – Wiltshire Biodiversity Action Plan (BAP)¹⁸

Justification of how SS has been assigned to baseline and post-development habitats has been provided in the Results section.

2.1.5 BNG Good Practice Principles for Development

The BNG Good Practice Principles for Development are a set of ten principles which “*set out good practice for achieving Biodiversity Net Gain and must be applied all together, as one approach*”³. These principles are as follows:

- Principle 1. Apply the Mitigation Hierarchy
- Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere
- Principle 3. Be inclusive and equitable
- Principle 4. Address risks
- Principle 5. Make a measurable Net Gain contribution
- Principle 6. Achieve the best outcomes for biodiversity
- Principle 7. Be additional
- Principle 8. Create a Net Gain legacy
- Principle 9. Optimise sustainability
- Principle 10. Be transparent

¹⁵ UK Government (2023). [Local nature recovery strategies: responsible authorities.](#)

¹⁶ Wiltshire Council (2024) [Local Nature Recovery Strategy Measures](#)

¹⁷ AECOM (2024). Flaxlands Solar Farm - Ecological Impact Assessment.

¹⁸ Wiltshire Wildlife Trust (2008). [The Wiltshire Biodiversity Action Plan 2008.](#)

This assessment has adhered to this step-by-step process to ensure that best practices are followed. This is evidenced in Section 3.3 initially, with a more comprehensive breakdown provided in Appendix E.

2.2 Assumptions and Limitations

In undertaking the calculation, the following assumptions have been made:

- The Metric calculator is presenting the following error message: *“Error – Area created does not equal area lost”*. The Metric presents area habitat losses as 65.41 ha and created habitats equal 65.42 ha. This discrepancy is caused by rounding figures to two decimal places and is not considered a limitation.
- All habitat areas and lengths have been measured manually using ArcGIS, based on the UKHab data collected during the Preliminary Ecological Appraisal¹³ and presented in the Outline Landscape Masterplan⁵. These measurements are approximate, and the associated habitat units presented in this report provide an indicative representation of both baseline and post-development habitat values.
- Guidance published by Building Research Establishment¹⁹ recognises that on average 95% of a site used for solar farm development is *“still accessible for plant growth and potentially for wildlife enhancements and complementary agricultural activities such as conservation grazing”*. An approach of 95% of the Solar PV Panel footprint within the Site has been categorised as the ‘Grassland – Other neutral grassland’, with the remaining 5% categorised as ‘Urban – Developed land; sealed surface’ to take into account the Solar PV Panel and supporting infrastructure. This approach has been assumed for this assessment and is understood to be supported by the Royal Society for the Protection of Birds²⁰.

¹⁹ BRE (2014). [Biodiversity Guidance for Solar Developments](#).

²⁰ RSPB (2017). RSPB Policy Briefing, May 2017.

3. Results

3.1 Baseline Habitats

The Site covers a total of 87.09 ha and supports a range of habitats varying in ecological distinctiveness from 'Very Low' to 'Very High'. The most widespread habitat is Modified Grassland, with substantial areas of Other Neutral Grassland also present. In addition, the Site supports approximately 9.95 km of hedgerow habitat and 0.09 km of ditch habitat.

The Baseline Habitat Plan is provided in Appendix A, and detailed habitat descriptions are available in the Preliminary Ecological Appraisal¹³.

3.1.1 Habitat Degradation

Under Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021⁸), LPAs may consider any habitat degradation or deliberate destruction since 30 January 2020 when determining the baseline for BNG.

No evidence of intentional habitat degradation or biodiversity value loss was observed on Site since the specified date.

3.1.2 Irreplaceable Habitat

Five veteran trees were recorded on Site, ranging in size from 'Medium' to 'Very Large'. These trees are considered irreplaceable habitats and will be retained in full. Further details are provided in the Arboricultural Impact Assessment²¹.

3.1.3 Baseline Habitats – SS

As per Section 2.1.3, SS has been assigned to all baseline habitats as follows:

- **'High' SS:**
 - All grassland habitats within the Flaxlands Manor CWS, in line with the site's designation for grassland value.
 - Woodland, trees (including veteran trees), hedgerows, and ponds identified in the draft LNRS within the CWS.
- **'Medium' SS:**
 - The above habitat types, where located outside the CWS, recognising their role in supporting protected species.
 - Mixed scrub habitat, though not specifically listed in the BAP or LNRS, has been assigned Medium SS due to its potential to support priority species such as the Duke of Burgundy butterfly *Hamearis lucina*, which is associated with neutral grassland, woodland, and mosaic habitats.
- **'Low' SS:**
 - Assigned to Modified Grassland outside the CWS, Hardstanding, and Buildings, given their low ecological value, limited connectivity, and absence from local priority habitat lists.

3.1.4 Baseline Habitats – Units

Baseline biodiversity values are calculated as follows:

- Area habitats: 429.32 units
- Hedgerow habitats: 80.80 units
- Watercourse habitats: 0.41 units

Refer to Appendix F for detailed metric outputs.

²¹ AECOM (2024). Flaxlands Solar Farm – Arboricultural Impact Assessment.

3.2 Post-Development Habitats

The Outline Landscape Masterplan⁵ proposes the retention of 22.4 ha of existing habitat and the creation of 65.4 ha of new area habitat to compensate for losses resulting from the Proposed Development. To adopt a precautionary approach, baseline grasslands proposed for improvement have been treated as newly created habitats rather than enhanced.

New grassland habitats will include:

- Lowland Meadow (to be seeded in areas surrounding the solar panels)
- Other Neutral Grassland (to form the under-panel sward)

Additional proposals include new hedgerow planting and 'gapping up', both of which are treated as habitat creation for BNG purposes. Areas allocated to access tracks and solar infrastructure are also included in the habitat creation total.

Approximately 0.14 km of hedgerow will be lost due to access widening. To mitigate this, 2.23 km of hedgerow is proposed for enhancement and 0.91 km for creation. No ditch habitats will be lost or crossed by infrastructure. Fencing will ensure exclusion from the ditch corridor, and the existing 0.09 km of ditch will be enhanced to support delivery of a minimum 10% BNG.

The Post-Development Habitat Plan is provided in Appendix B. SS assignments for post-development habitats follow the same principles as those used for baseline habitats.

3.2.1 Retained, Enhanced and Created Habitat Units

A breakdown of biodiversity units to be retained, enhanced, and created is provided below and detailed further in Appendix F:

- **Retained Units:**
 - Area habitats: 173.21 units
 - Hedgerow habitats: 57.39 units
 - Watercourse habitats: 0.00 units
- **Enhanced Units:**
 - Area habitats: 0.00 units
 - Hedgerow habitats: 35.68 units
 - Watercourse habitats: 0.76 units
- **Created Units:**
 - Area habitats: 316.79 units
 - Hedgerow habitats: 7.83 units
 - Watercourse habitats: 0.00 units

3.3 Application of the Mitigation Hierarchy

To minimise biodiversity loss and align with the mitigation hierarchy, avoidance and minimisation have been prioritised wherever possible. Compensation has been considered only where necessary.

3.3.1 Avoidance

Buffers have been incorporated around key ecological features to prevent direct impacts, as summarised in Table 4. Notably, a hedgerow with potential to support hazel dormouse in the northern extent of the Site was removed from the development boundary to avoid harm to this feature.

The same approach has also been taken for areas of Lowland meadows that were previously within the site boundary.

Table 4. Avoidance Buffers Applied to Ecological Features

Ecological Feature	Agreed Buffer Zone
Watercourses (rivers and ditches)	No works within 10 m
Waterbodies (ponds)	No works within 10 m
Ancient woodland designations	No works within 30 m (except for existing road access); mitigation as per Arboricultural Impact Assessment (AIA).
Woodland and individual trees	No works within 15 m; mitigation as per AIA
Trees with suitability for roosting bats	No works within 15 m (except for access); mitigation as per AIA No solar PV panels within 20 m No buildings or hardstanding within 30 m
Hedgerows	No works within 10 m (except for access) No solar PV panels within 10 m

3.3.2 Minimise

Vegetation clearance has been restricted to the minimum required. Where hedgerow access is necessary, existing gaps will be prioritised, and pruning will be used instead of full removal wherever feasible.

3.4 Summary of Results

All baseline, retained, enhanced, and created habitats are included in the accompanying SBM assessment (Appendix G). Table 5 summarises the unit change and net gain across habitat types.

Table 5. Summary of Results

Habitat Type	Baseline	Post-Development	Total Net Unit Change	Total Net % Change
Area Units	429.32	490.00	60.68	14.13%
Hedgerow Units	80.80	100.90	20.10	24.88%
Watercourse Units	0.41	0.76	0.34	82.98%

3.4.1 Trading Rules

3.4.1.1 Area Habitats

The SBM trading rules are met for each distinctiveness level. Losses of Medium and Low distinctiveness habitats are offset by gains in Very High distinctiveness Lowland Meadow habitats. A breakdown of changes is provided in Table 6.

Table 6. Trading Rules – Area Habitats

Broad Habitat	Habitat Type	Distinctiveness Group	Trading Rule	Unit Change per habitat	Trading Satisfied?
Grassland	Lowland Meadows	V. High	Bespoke compensation likely to be required	164.28	Yes
Grassland	Other neutral grassland	Medium	Same broad habitat or a higher distinctiveness habitat required	-5.38	Yes*
Individual trees	Rural tree			-2.29	
Grassland	Modified Grassland	Low	Same distinctiveness or better habitat required	-95.93	Yes*
Total				60.68	

3.4.1.2 Hedgerow Habitats

Trading rules are also satisfied for all hedgerow habitats. Losses of lower distinctiveness hedgerows are more than compensated for by gains in Medium and High distinctiveness types, see Table 7.

Table 7. Trading Rules – Hedgerow Habitats

Habitat Group	Distinctiveness Group	Trading Rule	Unit Change per habitat	Trading Satisfied?
Species-rich native hedgerow with trees	High	Like for like or better	6.87	Yes
Species-rich native hedgerow	Medium	Same distinctiveness or better habitat required	16.40	Yes
Native hedgerow with trees			0.00	
Native hedgerow	Low / V. Low	Same distinctiveness or better habitat required	-3.17	Yes*
Total			18.97	

3.4.1.3 Watercourse Habitats

No loss of ditch habitat is proposed, and only enhancement is planned. The trading rules are therefore met for this habitat type.

4. Conclusion

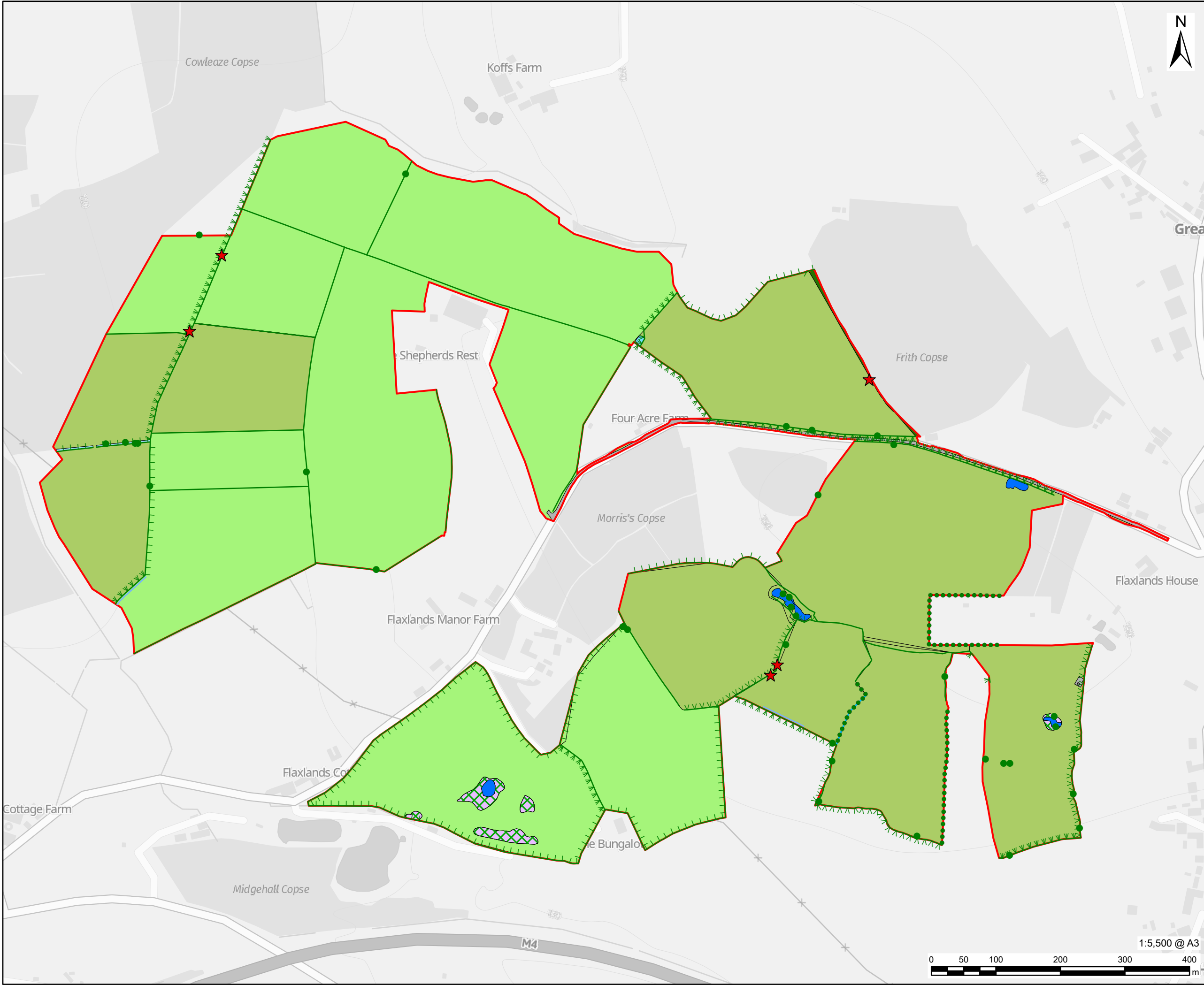
The Proposed Development is predicted to achieve the following net gains:

- Area habitats: +14.13%
- Hedgerow habitats: +24.88%
- Watercourse habitats: +82.98%

This exceeds the statutory minimum of 10% net gain for each habitat type.

The achievement of these gains depends on the successful establishment and management of all retained, enhanced, and created habitats to their target conditions, in accordance with the criteria set out in the SBM User Guide. Ongoing monitoring and adaptive management will be essential to ensure delivery of these outcomes. Remedial actions may be required where habitats fail to progress toward their intended condition.

Appendix A Baseline Habitat Plan



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LEGEND

Site Boundary

Baseline UK Habitat Type

Rural tree

Veteran tree

Line of trees

Native hedgerow

Native hedgerow with trees

Species-rich native hedgerow

Species-rich native hedgerow with trees

Species-rich native hedgerow with trees - associated with bank or ditch

Ditches

Grassland - Lowland meadows

Grassland - Modified grassland

Grassland - Other neutral grassland

Heathland and shrub - Mixed scrub

Lakes - Ponds (non-priority habitat)

Lakes - Ponds (priority habitat)

Urban - Building

Urban - Developed land; sealed surface

Watercourse Footprint

Woodland and forest - Other woodland; broadleaved

NOTES

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ISSUE PURPOSE

Biodiversity Net Gain Assessment

PROJECT NUMBER

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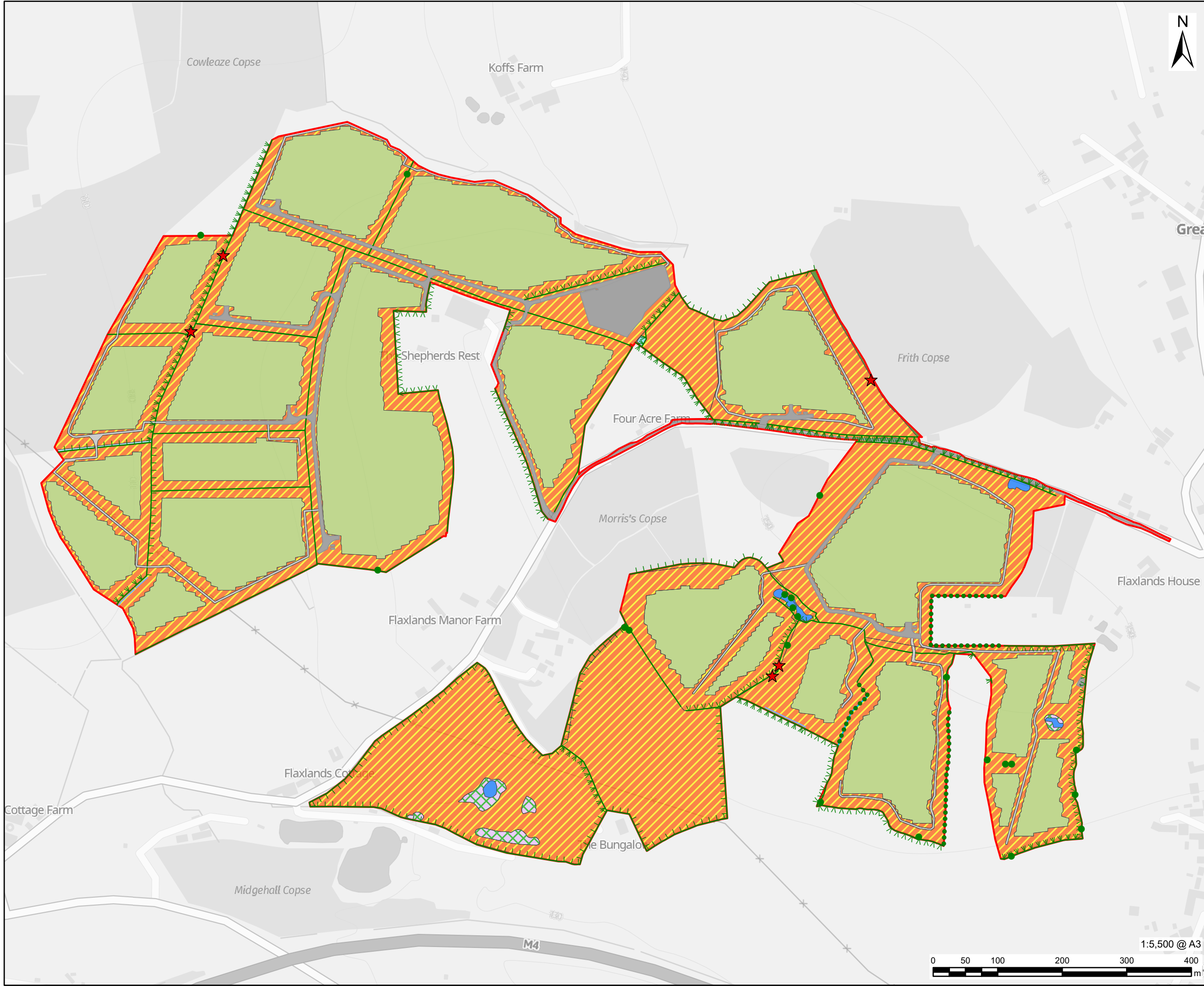
FIGURE TITLE

Biodiversity Net Gain Baseline Habitats Plan

FIGURE NUMBER

Appendix A

Appendix B Post-Development Habitat Plan



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LEGEND

Site Boundary

Post Dev UK Habitat Type

- Rural tree
- Veteran tree
- Line of trees
- Native hedgerow
- Native hedgerow with trees
- Species-rich native hedgerow
- Species-rich native hedgerow with trees
- Species-rich native hedgerow with trees - associated with bank or ditch
- Ditches
- Grassland - Lowland meadows
- Grassland - Modified grassland
- Grassland - Other neutral grassland
- Woodland and forest - Other woodland; broadleaved
- Heathland and shrub - Mixed scrub
- Lakes - Ponds (non-priority habitat)
- Lakes - Ponds (priority habitat)
- Watercourse Footprint
- Urban - Building
- Urban - Developed land; sealed surface
- Urban - Artificial unvegetated, unsealed surface

NOTES

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ISSUE PURPOSE

Biodiversity Net Gain Assessment

PROJECT NUMBER

60727989

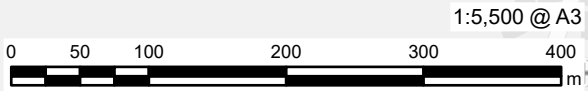
FIGURE TITLE

Biodiversity Net Gain Post Development Habitats Plan

FIGURE NUMBER

Appendix B

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Appendix C Habitat Condition Assessments

C.1 Baseline Habitat Condition Assessment

Broad Habitat	Habitat Type	Condition Sheet	Condition Sheet Criteria													Score	Condition
			A / A1	B / A2	C / B1	D / B2	E / C1	F / C2	G / D1	H / D2	I / E1	J / E2	K	L	M		
Grassland	Other neutral grassland	6	N	N	Y	Y	N	N								3	Poor
Grassland	Other neutral grassland	6	Y	Y	N	Y	Y	N								4	Moderate
Grassland	Other neutral grassland	6	N	N	Y	Y	N	N								2	Poor
Grassland	Modified grassland	5	N	N	Y	Y	Y	Y	Y							4	Poor
Grassland	Lowland meadows	6	Y	Y	Y	N	Y	Y								5	Good
Grassland	Modified grassland	5	N	N	Y	Y	Y	Y	Y							4	Poor
Grassland	Modified grassland	5	N	N	Y	Y	Y	Y	Y							4	Poor
Grassland	Modified grassland	5	N	N	Y	Y	Y	Y	Y							4	Poor
Grassland	Lowland meadows	6	Y	Y	Y	Y	Y	Y								6	Good
Grassland	Lowland meadows	6	Y	Y	N	Y	Y	Y								5	Good
Woodland	Other woodland, broadleaved	24	2	2	3	3	3	2	2	3	2	2	1	1	2	28	Moderate
Heathland and shrub	Mixed scrub	20	Y	Y	Y	N	N									3	Moderate
Lakes	ponds (non-priority)	18	N	N	N	N	Y	Y	Y	N	N					3	Poor

Broad Habitat	Habitat Type	Condition Sheet	Condition Sheet Criteria													Score	Condition
			A / A1	B / A2	C / B1	D / B2	E / C1	F / C2	G / D1	H / D2	I / E1	J / E2	K	L	M		
Lakes	ponds (priority habitat)	18	Y	N	Y	N	N	Y	Y	Y	Y					6	Moderate
Lakes	ponds (priority habitat)	18	N	Y	Y	N	N	Y	Y	Y	Y					6	Moderate
Lakes	ponds (priority habitat)	18	N	Y	N	N	Y	Y	Y							4	Poor
Lakes	ponds (priority habitat)	18	Y	Y	N	Y	Y	Y	Y	N	Y					6	Moderate
Lakes	ponds (priority habitat)	18	Y	Y	Y	Y	Y	Y	Y	N	Y					8	Moderate
Lakes	ponds (priority habitat)	18	N	N	Y	Y	Y	Y	Y	N	Y					6	Moderate
Lakes	ponds (priority habitat)	18	Y	Y	Y	Y	Y	Y	Y	Y	N					8	Moderate
Lakes	ponds (priority habitat)	18	N	Y	N	Y	Y	Y	Y	N	Y					6	Moderate
Ditches	Ditches	4	N	N	Y	N	Y	N	N	Y						3	Poor
Hedgerow	Line of trees	16	Y	N	Y	Y	Y									4	Moderate
Hedgerow	Species-rich native hedgerow	8	Y	N	Y	N	N	Y	Y	N	N	Y				5	Moderate
Hedgerow	Species-rich native hedgerow	8	Y	Y	Y	Y	N	Y	Y	Y	Y	Y				9	Good
Hedgerow	Native hedgerow	8	Y	N	Y	Y	N	Y	Y	N						5	Moderate
Hedgerow	Species-rich native hedgerow	8	Y	Y	N	Y	N	Y	Y	N						4	Moderate
Individual tree	Individual tree	9	Y	Y	Y	Y	Y	Y								6	Good

Broad Habitat	Habitat Type	Condition Sheet	Condition Sheet Criteria													Score	Condition
			A / A1	B / A2	C / B1	D / B2	E / C1	F / C2	G / D1	H / D2	I / E1	J / E2	K	L	M		
Individual tree	Individual tree	9	Y	Y	Y	Y	Y	Y								6	Good

C.2 Post-Development Target Conditions

Broad Habitat	Habitat Type	Condition Sheet	Condition Sheet Criteria													Score	Condition
			A / A1	B / A2	C / B1	D / B2	E / C1	F / C2	G / D1	H / D2	I / E1	J / E2	K	L	M		
Grassland	Other neutral grassland	6	Y	Y	N	Y	Y	Y	-	-	-	-	-	-	-	5	Moderate
Grassland	Lowland meadows	6	Y	Y	N	Y	Y	Y	-	-	-	-	-	-	-	5	Moderate
	Species-rich native hedgerow	8	Y	Y	Y	Y	Y	Y	Y	Y	-	-	-	-	-	8	Good

Appendix D Post-Development Habitat Classification Conversions

Outline Landscape Masterplan Classification	UKHab Classification
Existing Tree to be Retained	Retained Baseline
Existing Hedgerow with Trees to be Strengthened	Baseline Enhanced
Existing Hedgerow with Trees to be Retained	Retained Baseline
Existing Hedgerow to be Retained	Retained Baseline
Existing Woodland Fringe to be Retained	Retained Baseline
Proposed New Native Hedgerow	Species-rich native hedgerow
Proposed Semi-Improved (Neutral) Grassland	Grassland – Other neutral grassland
Proposed Lowland Meadow (Neutral) Grassland	Grassland – Lowland meadows
Proposed Location of Substation	Urban – Developed land; sealed surface
Proposed BESS Units	Urban – Developed land; sealed surface
Proposed BESS Management Unit	Urban – Developed land; sealed surface
Access Track	Urban – Artificial unvegetated, unsealed surface

Appendix E BNG Good Practice Principles for Development

Principle	How has this been applied in the assessment
Principle 1: Apply the Mitigation Hierarchy	The mitigation hierarchy has been followed by minimising vegetation clearance, particularly of hedgerows. Existing gaps in hedgerows are utilised for access wherever possible. The Site boundary was refined during project development to avoid high-value grassland. Buffers have been incorporated around high ecological value features, including hedgerows, trees, ancient woodland, ponds, and watercourses, to avoid impacts.
Principle 2: Avoid losing biodiversity that cannot be offset by gains elsewhere	No works are proposed within irreplaceable habitats, such as veteran trees. A buffer has been applied around ancient woodland along the Site boundary to avoid adverse effects.
Principle 3: Be inclusive and equitable	Although the Site requires fencing for security, existing Public Rights of Way (PRoWs) will be retained and diverted within the same fields to allow continued access during operation. The landscape design considers PRoW routes to ensure usability and integration.
Principle 4: Address risks	Risks such as delays in habitat establishment have been accounted for. As construction is expected to last six months, habitat reinstatement is planned to occur within one year of commencement, reducing temporal gaps in biodiversity delivery.
Principle 5: Make a measurable Net Gain contribution	The Proposed Development achieves measurable biodiversity gains, exceeding the statutory 10% requirement through targeted on-site habitat creation and enhancement.
Principle 6: Achieve the best outcomes for biodiversity	Optimal outcomes have been pursued by prioritising avoidance of impacts to valuable habitats. Where impacts are unavoidable, mitigation has focused on delivering priority habitats, including lowland meadow.
Principle 7: Be additional	Biodiversity enhancements proposed are above and beyond existing legal or policy obligations and would not occur without the Proposed Development, and are therefore considered additional.
Principle 8: Create a net gain legacy	A long-term management and monitoring regime will be implemented, particularly in areas supporting species-rich grassland or lowland meadow, to secure the biodiversity gains over the lifetime of the development.
Principle 9: Optimise sustainability	The development delivers renewable energy through solar PV while embedding biodiversity enhancements, contributing to climate and ecological objectives in tandem.
Principle 10: Be transparent	All assumptions, data sources, and methods used in the BNG assessment are clearly presented in this report and its associated appendices.

Appendix F Data Tables

F.1 Baseline Data

Baseline Area Habitats

Broad Habitat	Habitat Type	Irreplaceable habitat	Area (ha)	Distinctiveness (Dist.)	Condition	SS	Habitat Units
Grassland	Modified grassland	No	34.45	Low	Poor	Low	68.90
Grassland	Modified grassland	No	11.75	Low	Poor	High	27.03
Grassland	Other neutral grassland	No	6.89	Medium	Good	Medium	90.95
Grassland	Other neutral grassland	No	8.86	Medium	Good	High	122.27
Grassland	Other neutral grassland	No	23.89	Medium	Poor	Medium	105.12
Grassland	Other neutral grassland	No	0.05	Medium	Poor	High	0.23
Heathland and shrub	Mixed scrub	No	0.03	Medium	Moderate	Medium	0.26
Heathland and shrub	Mixed scrub	No	0.37	Medium	Moderate	High	3.40
Lakes	Ponds (non-priority habitat)	No	0.01	Medium	Poor	Medium	0.04
Lakes	Ponds (priority habitat)	No	0.09	High	Moderate	Medium	1.19
Lakes	Ponds (priority habitat)	No	0.08	High	Moderate	High	1.10
Urban	Developed land; sealed surface	No	0.46	V.Low	N/A - Other	Low	0.00
Watercourse Footprint	Watercourse Footprint	No	0.07	V.low	N/A - Other	Low	0.00
Woodland and forest	Other woodland; broadleaved	No	0	Medium	Good	Medium	0.00
Woodland and forest	Other woodland; broadleaved	No	0.09	Medium	Moderate	Medium	0.79
Individual trees	Rural tree	No	0.22	Medium	Good	Medium	2.90
Individual trees	Rural tree	Yes	0.07	Medium	Good	High	0.00
Individual trees	Rural tree	No	0.04	Medium	Good	High	0.55
Individual trees	Rural tree	No	0.1	Medium	Good	Medium	1.32
Individual trees	Rural tree	No	0.03	Medium	Poor	Medium	0.13
Individual trees	Rural tree	Yes	0.02	Medium	Good	High	0.00
Individual trees	Rural tree	No	0.15	Medium	Good	Medium	1.98

Broad Habitat	Habitat Type	Irreplaceable habitat	Area (ha)	Distinctiveness (Dist.)	Condition	SS	Habitat Units
Individual trees	Rural tree	No	0.05	Medium	Good	High	0.69
Individual trees	Rural tree	No	0.01	Medium	Good	Medium	0.13
Individual trees	Rural tree	No	0.02	Medium	Good	High	0.28
Individual trees	Rural tree	No	0.01	Medium	Poor	High	0.05
Individual trees	Rural tree	Yes	0.08	Medium	Good	High	0.00
Individual trees	Rural tree	Yes	0.08	Medium	Good	High	0.00
Total			87.09*				429.32

*"Individual trees – Rural Tree" areas are excluded from total area to prevent double counting of area; however, the unit contributions are included within the habitat unit total.

Baseline Hedgerow Habitats

Habitat Type	Length (km)	Dist.	Condition	SS	Hedgerow Units
Line of trees	0.31	Low	Moderate	Medium	1.36
Line of trees	0.33	Low	Moderate	High	1.52
Native hedgerow	3.34	Low	Moderate	Medium	14.70
Native hedgerow	0.45	Low	Moderate	High	2.07
Native hedgerow	0.08	Low	Moderate	High	0.37
Native hedgerow with trees	0.6	Medium	Moderate	Medium	5.28
Native hedgerow with trees	1.99	Medium	Moderate	High	18.31
Species-rich native hedgerow	0.35	Medium	Moderate	Medium	3.08
Species-rich native hedgerow	0.62	Medium	Good	High	8.56
Species-rich native hedgerow with trees	1.56	High	Moderate	Medium	20.59
Species-rich native hedgerow with trees	0.19	High	Moderate	High	2.62
Species-rich native hedgerow with trees - associated with bank or ditch	0.06	V.High	Moderate	Medium	1.06
Species-rich native hedgerow with trees - associated with bank or ditch	0.07	V.High	Moderate	High	1.29
Line of trees	0.31	Low	Moderate	Medium	1.36
Line of trees	0.33	Low	Moderate	High	1.52
Total		9.95			80.80

Baseline Watercourse Habitats

Habitat Type	Length (km)	Dist.	Condition	SS	Watercourse Units
Ditches	0.09	Medium	Poor	High	0.41
Total	0.09				0.41

F.2 Post-Development Data

i) Post-Development – Summary Tables

Post-Development Summary – Area Habitats

Broad Habitat	Habitat Type	Irreplaceable Habitat	Area (ha)			Dist.	Condition	SS	Habitat Units		
			Retained	Enhanced	Lost				Retained	Enhanced	Lost
Grassland	Modified grassland	No	0.00	0.00	34.45	Low	Poor	Low	0.00	0.00	68.90
Grassland	Modified grassland	No	0.00	0.00	11.75	Low	Poor	High	0.00	0.00	27.03
Grassland	Other neutral grassland	No	2.87	0.00	4.02	Medium	Good	Medium	37.88	0.00	53.06
Grassland	Other neutral grassland	No	4.82	0.00	4.04	Medium	Good	High	66.52	0.00	55.75
Grassland	Other neutral grassland	No	12.79	0.00	11.10	Medium	Poor	Medium	56.28	0.00	48.84
Grassland	Other neutral grassland	No	0.00	0.00	0.05	Medium	Poor	High	0.00	0.00	0.23
Heathland and shrub	Mixed scrub	No	0.03	0.00	0.00	Medium	Moderate	Medium	0.26	0.00	0.00
Heathland and shrub	Mixed scrub	No	0.37	0.00	0.00	Medium	Moderate	High	3.40	0.00	0.00
Lakes	Ponds (non-priority habitat)	No	0.01	0.00	0.00	Medium	Poor	Medium	0.04	0.00	0.00
Lakes	Ponds (priority habitat)	No	0.09	0.00	0.00	High	Moderate	Medium	1.19	0.00	0.00
Lakes	Ponds (priority habitat)	No	0.08	0.00	0.00	High	Moderate	High	1.10	0.00	0.00
Urban	Developed land; sealed surface	No	0.46	0.00	0.00	V.Low	N/A - Other	Low	0.00	0.00	0.00
Watercourse Footprint	Watercourse Footprint	No	0.07	0.00	0.00	V.Low	N/A - Other	Low	0.00	0.00	0.00
Woodland and forest	Other woodland; broadleaved	No	0.00	0.00	0.00	Medium	Good	Medium	0.00	0.00	0.00

Broad Habitat	Habitat Type	Irreplaceable Habitat	Area (ha)			Dist.	Condition	SS	Habitat Units		
			Retained	Enhanced	Lost				Retained	Enhanced	Lost
Woodland and forest	Other woodland; broadleaved	No	0.09	0.00	0.00	Medium	Moderate	Medium	0.79	0.00	0.00
Individual trees	Rural tree	No	0.22	0.00	0.00	Medium	Good	Medium	2.90	0.00	0.00
Individual trees	Rural tree	Yes	0.07	0.00	0.00	Medium	Good	High	Irreplaceable habitat - no units generated Δ	0.00	0.00
Individual trees	Rural tree	No	0.04	0.00	0.00	Medium	Good	High	0.55	0.00	0.00
Individual trees	Rural tree	No	0.10	0.00	0.00	Medium	Good	Medium	1.32	0.00	0.00
Individual trees	Rural tree	No	0.02	0.00	0.01	Medium	Poor	Medium	0.09	0.00	0.04
Individual trees	Rural tree	Yes	0.02	0.00	0.00	Medium	Good	High	Irreplaceable habitat - no units generated Δ	0.00	0.00
Individual trees	Rural tree	No	0.00	0.00	0.15	Medium	Good	Medium	0.00	0.00	1.98
Individual trees	Rural tree	No	0.05	0.00	0.00	Medium	Good	High	0.69	0.00	0.00
Individual trees	Rural tree	No	0.00	0.00	0.01	Medium	Good	Medium	0.00	0.00	0.13
Individual trees	Rural tree	No	0.01	0.00	0.01	Medium	Good	High	0.14	0.00	0.14
Individual trees	Rural tree	No	0.01	0.00	0.00	Medium	Poor	High	0.05	0.00	0.00
Individual trees	Rural tree	Yes	0.08	0.00	0.00	Medium	Good	High	Irreplaceable habitat - no units generated Δ	0.00	0.00
Individual trees	Rural tree	Yes	0.08	0.00	0.00	Medium	Good	High	Irreplaceable habitat - no units generated Δ	0.00	0.00
Total			22.38	0.00	65.59				173.21	0.00	256.11

Post-Development Summary – Hedgerow Habitats

Habitat Type	Length (km)			Dist.	Condition	SS	Hedgerow Units		
	Retained	Enhanced	Lost				Retained	Enhanced	Lost
Line of trees	0.31	0.00	0.00	Low	Moderate	Medium	1.36	0.00	0.00
Line of trees	0.33	0.00	0.00	Low	Moderate	High	1.52	0.00	0.00
Native hedgerow	2.64	0.65	0.05	Low	Moderate	Medium	11.62	2.86	0.22
Native hedgerow	0.45	0.00	0.00	Low	Moderate	High	2.07	0.00	0.00
Native hedgerow	0.06	0.00	0.02	Low	Moderate	High	0.28	0.00	0.09
Native hedgerow with trees	0.6	0.00	0.00	Medium	Moderate	Medium	5.28	0.00	0.00
Native hedgerow with trees	1.99	0.00	0.00	Medium	Moderate	High	18.31	0.00	0.00
Species-rich native hedgerow	0.00	0.31	0.04	Medium	Moderate	Medium	0.00	2.73	0.35
Species-rich native hedgerow	0.62	0.00	0.00	Medium	Good	High	8.56	0.00	0.00
Species-rich native hedgerow with trees	0.26	1.27	0.03	High	Moderate	Medium	3.43	16.76	0.40
Species-rich native hedgerow with trees	0.19	0.00	0.00	High	Moderate	High	2.62	0.00	0.00
Species-rich native hedgerow with trees - associated with bank or ditch	0.06	0.00	0.00	V.High	Moderate	Medium	1.06	0.00	0.00
Species-rich native hedgerow with trees - associated with bank or ditch	0.07	0.00	0.00	V.High	Moderate	High	1.29	0.00	0.00
Total	7.58	2.23	0.14				57.39	22.35	1.06

Post-Development Summary – Watercourse Habitats

Habitat Type	Length (km)			Dist.	Condition	SS	Watercourse Units		
	Retained	Enhanced	Lost				Retained	Enhanced	Lost
Ditches	0.00	0.09	0.00	Medium	Poor	High	0.00	0.41	0.00
Total	0.00	0.09	0.00				0.00	0.41	0.00

ii) Enhanced Habitats – Detailed Summary

Enhanced Hedgerow Habitats

Baseline Habitat Type	Post-Development Habitat Type	Length (km)	Distinctiveness Change	Condition Change	SS Change	Unit delivered
Native hedgerow	Species-rich native hedgerow	0.65	Low - Medium	Lower Distinctiveness Habitat - Good	None	2.86 → 7.65 = 4.79
Species-rich native hedgerow	Species-rich native hedgerow	0.31	Medium - Medium	Moderate - Good	None	2.73 → 4.00 = 1.27
Species-rich native hedgerow with trees	Species-rich native hedgerow with trees	1.27	High - High	Moderate - Good	None	16.76 → 24.03 = 7.27
Total		2.23				22.35 → 35.68 = 13.33

Enhanced Watercourse Habitats

Baseline Habitat Type	Post-Development Habitat Type	Length (km)	Distinctiveness Change	Condition Change	SS Change	Unit delivered
Ditches	Ditches	0.09	Medium - Medium	Poor - Moderate	None	0.41 → 0.76 = 0.35
Total		0.09				0.41 → 0.76 = 0.35

i) Created Habitats – Detailed Summary

Created Area Habitats

Broad Habitat	Habitat type	Area (ha)	Dist.	Target Condition	SS	Time to target condition (yrs)	Habitat Units
Grassland	Lowland meadows	24.06	V.High	Moderate	Medium	10	97.86
Grassland	Lowland meadows	15.62	V.High	Moderate	High	10	66.42
Grassland	Other neutral grassland	20.71	Medium	Moderate	Medium	5	152.51
Urban	Developed land; sealed surface	1.09	V.Low	N/A - Other	Low	0	0.00
Urban	Artificial unvegetated, unsealed surface	1.50	V.Low	N/A - Other	Low	0	0.00
Urban	Developed land; sealed surface	2.44	V.Low	N/A - Other	Low	0	0.00
Total		65.42					316.79

Created Hedgerow Habitats

Habitat type	Length (km)	Dist.	Target Condition	SS	Time to target condition (yrs)	Hedgerow Units
Species-rich native hedgerow	0.91	Medium	Good	Medium	12	7.83
Total	0.91					7.83

Appendix G SBM Calculation

SBM to be included as an attachment.

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