



BEACON FEN ENERGY PARK

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ST19595-212-1 UKHab Plan - Solar Array Area	1:10,000
ST19595-498-P0.01 UKHab Proposed Habitat Plan - Solar Array Area	1:15,000
ST19595-478-1 UKHab Habitat Plan - Bespoke Access Corridor	1:2500
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1. INTRODUCTION

1.1 Introduction

- 1.1.1 This Biodiversity Net Gain Assessment has been prepared by Wardell Armstrong (WA) on behalf of Beacon Fen Energy Park (hereafter referred to as the 'Applicant'). The assessment has been undertaken on land east of Ewerby Thorpe and west of Car Dyke, comprising most of Ewerby Fen down to the road adjacent to Howell Fen, hereafter referred to as the 'Solar Array Area', in addition to land west of this (hereafter referred to as the 'Bespoke Access Corridor', as well as land to the south and east (hereafter referred to as the 'Cable Route Corridor'). The assessment has been conducted to inform the development of Beacon Fen Energy Park at the Site (hereinafter referred to as the 'Proposed Development').
- 1.1.2 BNG is an approach that seeks to deliver measurable net gains in biodiversity through the planning process. It is not yet mandatory for NSIPs determined under the Planning Act 2008, such as Beacon Fen Energy Park. BNG is measured using a biodiversity metric published by DEFRA (the Statutory Metric, July 2024). The metric calculations compare the sites baseline biodiversity unit value with that following the construction of the Proposed Development. These calculations consider the level of proposed habitat loss, retention, enhancement and/or creation occurring across three distinct habitat groups: area-based habitats, hedgerows and watercourses.
- 1.1.3 The successful delivery of BNG relies upon the correct application of the 'mitigation hierarchy'. This approach prioritises preventative actions, including the avoidance and minimisation of developmental impacts, over restorative actions, such as the compensation or offsetting of habitat loss. BNG strategies for proposed developments also need to satisfy the BNG Hierarchy, the metrics habitat trading rules and be seen to meet peer accepted best practice principles.

1.2 Proposed Development

- 1.2.1 The proposals comprise of above ground solar photovoltaic (PV), and Battery Energy Storage System (BESS) infrastructure connected by a cable route of around 13 km length to the National Grid Bicker Fen 400 kV substation ('Bicker Fen substation') (the 'Proposed Development').
- 1.2.2 The Proposed Development will be located within the DCO Order Limits ('Order Limits') as shown on **Figure 1.2 Site Boundary Plan (Document Ref: 6.4 ES Vol.3, 6.4.2)** and comprises the Solar Array Area, the Bespoke Access Corridor and the Cable Route Corridor which are defined as follows:
- Solar Array Area - The land within the Order Limits within which the Solar PV and BESS (and their ancillary infrastructure) will be located.
 - Cable Route Corridor - The land within the Order Limits within which the Cable Route will be located.
 - Cable Route - The physical development, i.e. the cable itself, to be located within the Cable Route Corridor.

- Bespoke Access Corridor - The land within the Order Limits within which the Bespoke Access Road will be located.
- Bespoke Access Road - The physical development i.e. the road itself, to be located within the Bespoke Access Corridor.

1.3 Legislation, Policy, and Guidance

DEFRA 25-year environment plan

- 1.3.1 In England, DEFRA's 25-year environment plan (DEFRA 2018) (reviewed in the Environmental Improvement Plan (DEFRA 2023)) forms the key policy driver for both terrestrial and marine biodiversity net gain. The plan includes a commitment to embed environmental net gain into policy and legislation.

The Environment Act (2021)

- 1.3.2 The Environment Act (2021) includes provisions for the protection and improvement of the natural environment. The Act seeks to deliver this through development by making BNG a mandatory requirement within the planning system. Developments within the scope of the Town and Country Planning Act 1990, with some exemptions, have needed to demonstrate a minimum 10% net gain since early 2024, whilst it is anticipated that developments that qualify as Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008 will need to demonstrate a minimum 10% net gain if the DCO application is lodged after November 2025.
- 1.3.3 No BNG Statement has yet been published in draft or final form to guide how BNG is to be accommodated within individual DCOs or the application and examination process.
- 1.3.4 Under the Act, demonstrating how a development will deliver BNG is calculated by comparing the baseline biodiversity unit value of a site with the value of that site following development, using the Act's adopted Statutory Metric.
- 1.3.5 Statutory BNG is not being delivered by the Proposed Development, since it is not formally or statutorily part of NSIP consenting. The Applicant is voluntarily incorporating the substantive elements of the current BNG regime that is statutory in relation to Town and Country Planning Act 1990 projects into its application, in order to meet or exceed policy and consultee expectations. The Applicant is not proposing to adopt every prerequisite or procedural element of BNG. For example, the Statutory Metric (version issued July 2024) will be used by the Applicant at all stages of delivery. References in this document to 'statutory' BNG and metric and so forth should be read in this context.

National Energy Policy

- 1.3.6 The Overarching National Energy Policy Statement for Energy (EN-1) (DENZ 2023a) states that: Paragraph 4.6.2 "*Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.*"

- 1.3.7 It provides further details in Paragraph 4.6.7 *“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.”*
- 1.3.8 This is re-iterated in the National Policy Statement for Renewable Energy Infrastructure (EN-3) (DENZ 2023b) Paragraph 2.10.128 *“In England, proposed enhancements should take account of the above factors and as set out in Sections 4.6 and 5.5 of EN-1 aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.”*

National Planning Policy Framework

- 1.3.9 The National Planning Policy Framework (NPPF, MHCLG 2024), makes general provisions for the delivery of BNG. The NPPF states in paragraph 192 that *“planning policies and decisions should...identify and pursue opportunities for securing measurable net gains for biodiversity”*.

Local Planning Policy

- 1.3.10 The Site falls under planning policy produced by Central Lincolnshire in their Local Plan (2023), and South East Lincolnshire Local Plan (2011).
- 1.3.11 For Central Lincolnshire, Policy 61 of the Local Plan states *“Biodiversity net gain should be provided on-site wherever possible. Off-site measures will only be considered where it can be demonstrated that, after following the mitigation hierarchy, all reasonable opportunities to achieve measurable net gains on-site have been exhausted or where greater gains can be delivered off-site where the improvements can be demonstrated to be deliverable and are consistent with the Local Nature Recovery Strategy”*
- 1.3.12 The South East Lincolnshire Policy 28 of the Local Plan states *“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:*
- 1.3.13 *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;”*

BNG Guidance

- 1.3.14 The following publications have also been used to inform the BNG assessment:

- Guidance: Statutory Biodiversity Metric Tools and Guides (DEFRA 2024a)
- Central Lincolnshire Local Plan: Biodiversity Net Gain Guidance for Planners, Ecologists & Applicants (Greater Lincolnshire Nature Partnership May 2024)

1.4 Biodiversity Net Gain Target

- 1.4.1 The Proposed Development will aim to deliver a BNG uplift of at least 30 % in habitat area, and 10 % in hedgerow and watercourse units. Delivery of 30 % of BNG for habitat areas and 10% of BNG for hedgerow and watercourse, as a minimum, is secured through a requirement in Schedule 2 to the **Draft DCO (Document Ref: 3.1)**. The relevant requirement specifies that *"No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body. The biodiversity net gain strategy must be substantially in accordance with the outline landscape and ecological management plan and must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates."* This report has been prepared so that the level of BNG that the Proposed Development can be expected to deliver can be understood at this stage of the consenting process and to inform the preparation of the **Outline Landscape and Ecological Management Plan (OLEMP) (Document Ref: 6.3 ES Vol 2, 6.3.19)**.

2. METHODOLOGY AND STRATEGIC APPROACH

2.1 Statutory Biodiversity Metric

- 2.1.1 The BNG calculations presented in this report has been undertaken using DEFRA's current BNG metric, the Statutory Metric updated in July 2024.
- 2.1.2 A full description of the metric methodology is provided in the Statutory Biodiversity Metric: User Guide Last updated July 2024.
- 2.1.3 The Statutory Metric calculates separate outputs for the following unit types:
 - Habitat units, measured in hectares (ha)
 - Hedgerow units, measured in kilometres (km), and
 - Watercourse units, including ditches and canals, measured in kilometres (km).
- 2.1.4 Unit gains and losses are recorded and reported separately for each unit type.
- 2.1.5 The BNG Metric calculates baseline biodiversity unit value by assessing the extent, distinctiveness, condition and strategic significance of each habitat.
- 2.1.6 Post-development calculations are used to identify levels of habitat loss, retention, enhancement and/or creation. Post development scenarios can be calculated solely from within the site or through a combination of on-site and off -site locations.
- 2.1.7 When calculating post-development biodiversity unit values, a suite of further 'risk multipliers' are applied. These consider the difficulty and time required to enhance or create habitats and any spatial and temporal variation in where or when the provision of habitat enhancement or creation is intended to occur.
- 2.1.8 The loss, enhancement and creation of habitats are also governed by a set of 'trading rules'. These rules ensure developments do not result in the 'trading down' of habitat distinctiveness and that losses of habitats are instead compensated for on a 'like for like' or 'like for better' basis.
- 2.1.9 The data required to undertake the calculation is described further in Sections 2.2 and 2.3.

2.2 Baseline Data

- 2.2.1 Phase 1 habitat and botanical data was collected during surveys presented in the following documents:
 - Appendix 7.3 Preliminary Ecological Appraisal (Document ref: 6.3 ES Vol 2, 6.3.22);
 - Appendix 7.11 Botanical Survey Report (Solar Array Area) (Document ref: 6.3 ES Vol 2, 6.3.30)
- 2.2.2 For the purposes of the BNG calculation, Phase 1 habitat data was first translated into UKHab habitat types, and their corresponding BNG Metric habitat types. These translations are presented in Table 1.

2.2.3 Information used to inform the translations included:

- JNCC (2008) Spreadsheet of Habitat Correspondences;
- The Statutory Metric Technical Data tab UKHab/Phase 1 translation, and
- Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2020). The UK Habitat Classification Version 1.1 – Correspondences Spreadsheet

Table 1: Habitat translations to BNG Statutory Metric habitat types

Arable	Cropland – cereal crops Cropland – Arable field margins tussocky Grassland- Other neutral grassland (arable margins of higher biodiversity value)
Broadleaved Semi-natural Woodland	Woodland and forest - Lowland mixed deciduous woodland
Broadleaved Plantation Woodland	Woodland and forest – Other Woodland; broadleaved Woodland and forest – Other Woodland; mixed
Hard standing/track	Urban – Development land; sealed surface
Neutral Grassland – Semi-improved	Grassland – Other neutral grassland Grassland - Floodplain wetland mosaic and Coastal Floodplain Grazing Marsh CFGM (where identified as such on Magic Map)
Marsh Grassland	Grassland - Other neutral grassland (g3c7 Deschampsia neutral grassland)
Water	Lakes – Ponds (non-priority habitat)
Scattered Scrub	Heathland and scrub – Mixed scrub
Tall Ruderal	Other neutral grassland – Tall herb
Bare Ground	Urban – Bare ground
Ditch	Ditches
Line of trees -broadleaved/coniferous	Line of trees
Species poor hedge – Intact/Defunct	Native hedgerow – associated with bank or ditch

2.2.4 Baseline habitat extents were digitised using GIS software to illustrate and measure the area or length of each habitat type.

2.2.5 Baseline habitat conditions were determined either during field surveys or retrospectively reviewing data gathered in the field. In all instances

professional judgements have been made by suitably qualified ecologists with experience in detailed botanical surveys and familiar with the UK Habitat classification system and BNG metric calculations.

2.3 Post-development Data

- 2.3.1 The Proposed Development's **Figure 6.31 Landscape Strategy Plan (Document Ref: 6.3 ES Vol 2, 6.2.6)** has been compared to the baseline phase 1 habitat plan in **Appendix 7.3 Preliminary Ecological Appraisal (Document ref: 6.3 ES Vol 2, 6.3.22)** to determine the degree of habitat retention, loss, enhancement and creation occurring because of the Proposed Development.
- 2.3.2 Each of the elements of the Proposed Developments landscape strategy plan were converted to BNG habitat types. These translations are presented in Table 2.

Table 2: Landscape typology translation to BNG habitat types

Wildflower meadow	Other neutral grassland
Floodplain grazing marsh	Other neutral grassland
Native shrub mix	Mixed scrub
Neutral grassland	Modified Grassland/Other neutral grassland mix
Fence	Built linear features
Substation, roadways	Developed land sealed surface

2.4 Strategic Significance

- 2.4.1 Each habitat type has been assigned a Strategic Significance value. Assigning Strategic Significance utilises published Local Plan Policies and local strategies that identify priorities for targeting biodiversity and nature improvement, such as nature recovery strategies, local biodiversity plans, national character area objectives and green infrastructure strategies.

Solar Array Area BNG Strategy

- 2.4.2 Within the Solar Array Area the habitats with the highest distinctiveness will be retained or enhanced. Impacts upon arable margins, woodland compartments, ponds, lines of trees and hedgerows will be avoided, with ongoing management enhancing these features where possible.
- 2.4.3 Enhancements to approximately 12.58km of ditch will occur as part of the Proposed Development's management in line with the **OLEMP (Document ref: 6.3 ES Vol 2, 6.3.19)**.

- 2.4.4 The remaining area, approximately 486ha of arable land currently under cultivation, will undergo arable reversion to grassland. The grassland created will support the solar arrays and be managed through a cutting regime designed to maximise biodiversity in line with the **OLEMP (Document ref: 6.3 ES Vol 2, 6.3.19)**. Where solar arrays have been mounted higher due to flood risk, and where there will be no arrays to leave a buffer around farms the grassland will be sown with a higher diversity seed mix appropriate to the soil water levels. The cutting schedule within these areas will allow for the Site to offer approximately 17 ha of enhanced pollinator resource at key periods within the summer months.
- 2.4.5 It is also intended for both the ditch network present within the Solar Array Area to be buffered by approximately 28 ha of species rich grassland, incorporating existing arable margins and additional arable land. This area will be cut in line with the **OLEMP (Document ref 6.3 ES Vol 2, 6.3.19)**.
- 2.4.6 Approximately 3ha of the Solar Array Area will be planted with mixed scrub, to provide a visual screening and wildlife corridors at points around the Proposed Development.
- 2.4.7 Finally, the retained woodland and hedgerow network will be complimented through the creation of approximately 2.78km of species rich native hedgerow to strengthen existing connections and create new links.

Bespoke Access Corridor and Cable Route Corridor

- 2.4.8 There will be loss of a 20 m strip for the Bespoke Access Road which results in approximately 6.6 ha of losses in habitats, and 0.33 km of hedgerow within the Bespoke Access Corridor. In the Cable Route Corridor there will be loss of approximately 0.7 ha woodland to facilitate access to Bicker Fen Substation. All other habitats in the Bespoke Access Corridor and Cable Route Corridor will be only temporary lost (i.e. reinstated within two years) and therefore for the purpose of BNG assumed to remain at the baseline value in line with the BNG User Guide (DEFRA 2024a). The construction programme is set out in **Chapter 2 the Proposed Development (Document Ref: 6.2 ES Vol 1, 6.2.2)**.

2.5 Assumptions

- 2.5.1 The following assumptions have been made during the BNG metric Calculation:

Habitat management and Monitoring

- 2.5.2 All habitats retained, enhanced or created as part of the Proposed Development will be subject to ongoing management and monitoring in order to ensure each habitat meets its target condition as set out in the metric. The monitoring plan has been set out in the **OLEMP (Document ref 6.3: ES Vol 2, 6.3.19)**.
- 2.5.3 Should monitoring indicate that a habitat is failing, or is likely to fail, its target condition remedial action will be undertaken to ensure target conditions are met within the specified timeframes as set out in the metric.

Under Panel Grassland

- 2.5.4 Guidance published by BRE (2014) 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*”. To reflect this 95% of the Solar Array Area within the fields proposed for solar PV panels have been categorised as the UKHab habitat ‘modified grassland’ or ‘other neutral grassland’ with the remaining 5% allocated within the metric as ‘Developed land; sealed surface’ to account for array infrastructure and drainage.
- 2.5.5 Areas of modified grassland under panels with a have been assigned a post development target condition of ‘moderate’. This is to acknowledge the variation in the levels of shading these areas will receive over the lifetime of the Proposed Development.

Individual Trees

- 2.5.6 Individual trees have been assessed as individual ‘rural tree’ with condition and size based on the results of the Aboricultural survey. Where these occur in woodlands or as groups of trees mapped as woodland pockets these have not been assessed individually except where they have been assessed as having veteran status in line with DEFRA guidance.

Arable Margins

- 2.5.7 Arable margins have been assessed in **Appendix 7.11 Botanical Survey Report (Solar Array Area) (Document ref: 6.3 ES Vol 2 6.3.30)**. These surveys have separated arable margins into two UKHab/BNG Categories: ‘Cropland - Arable field margins tussocky’, condition assessment N/A, and ‘Other neutral grassland’ in moderate condition. This approach was undertaken to reflect the variation in floristic diversity present within the arable field margins and was in keeping with guidance set out in the Statutory Metric User Guide. However, further review of the results of these surveys suggest at the time of the surveys no active management for the benefit of biodiversity had been undertaken recently and therefore for the purpose of this BNG assessment these have all been considered as ‘Other neutral grassland’ in moderate condition.

Habitat Condition

- 2.5.8 Due to the findings from the ecology surveys identifying relative uniformity within habitat types across the Order Limits, baseline habitats of the same type and condition have been aggregated in the metric.

Watercourses

- 2.5.9 All watercourses, except for the South Forty Foot Drain, within or immediately adjacent to the Order Limits meet the metric definition of ‘Ditches’ and as such no River Morphology survey has been undertaken. It is understood that direct impacts to the South Forty Foot Drain will be avoided as the Cable Route will be installed under the watercourse using trenchless techniques such as horizontal directional drilling (HDD).

Mitigation and Additionality

- 2.5.10 To ensure transparency regarding the additionality delivered by the BNG strategy the Proposed Development has sought to ensure that at least 30% of

the BNG for habitat areas and 10% of the BNG for hedgerows and watercourses is delivered through habitat retention, enhancement or creation activities in line with the **OLEMP (Document ref: 6.3 ES Vol 2, 6.3.19)**, that are not required to mitigate or compensate for any protected species impacts. DEFRA, have provided the following example: *“If a development has a baseline score of 10 biodiversity units and needs to achieve a score of 11 units, at least 1 unit should come from separate, non-species mitigation, activities”* (DEFRA 2024b). The approach adopted at Beacon Fen Energy Park ensures this guidance has been followed.

Temporary Impacts within the Bespoke Access Corridor and Cable Route Corridor

- 2.5.11 A loss of 7.3 ha and 0.33km of habitat will occur across the Bespoke Access Corridor and Cable Route Corridor, as shown in Table 3. With the exception of these, for the BNG assessment, it is assumed that all works within these areas will be temporary in nature (i.e. in any one area works will be completed and habitats re-instated less than 2 years) .
- 2.5.12 In order to compensate for loss of native hedgerow, approximately 3.92km of native hedgerow within the Solar Array Area will be enhanced to species rich native hedgerow of the same conditions across the Site.

Culverts, Footpaths, Bridges, Soil Storage Bunds, and Compounds

- 2.5.13 The extent and degree of ditch encroachment resulting from the repair or replacement of existing bridges has been excluded from the calculation due to the small areas of impact involved.

Habitat Retention, Enhancement, and Loss

- 2.5.14 Table 3 sets out the assumed ratios of habitat retention, enhancement and loss arising from the Proposed Development. Table 4 identifies habitat creation.

Table 3: Areas of habitat retention, enhancement, and loss arising from the Proposed Development

Baseline Habitat	Area (ha)	Retained (ha)	Enhanced (ha)	Lost (ha)
Solar Array Area				
Cereal crops	478.81	0	0	478.81
Floodplain wetland mosaic and CFGM	4.37	0	0	4.37
Other neutral grassland	32.37	9.70	0	22.66
Modified grassland	2.18	0.63	0	1.55
Lowland mixed deciduous woodland	5.06	5.06	0	0
Other woodland; broadleaved	1.12	1.12	0	0
Ponds (non-priority habitat)	1.09	1.09	0	0

Mixed scrub	0.60	0.40	0	0.20
Developed land; sealed surface	1.34	0	0	1.34
Artificial unvegetated, unsealed surface	1.78	0	0	1.78
Rural tree	2.82	2.72	0	0.10
Total	531.54	19.73	0	511.81
Bespoke Access Corridor				
Cereal crops	41.12	35.12	0	6.01
Other neutral grassland	1.81	1.59	0	0.22
Modified grassland	1.88	1.61	0	0.27
Developed land; sealed surface	0.42	0.35	0	0.06
Other woodland; broadleaved	0.08	0.01	0	0.07
Total	45.31	38.75		6.56
Cable Route Corridor				
Other woodland; broadleaved	3.93	3.24	0	0.69
Mixed scrub	0.24	0.24	0	0
Other neutral grassland	11.18	11.18	0	0
Modified grassland	16.18	16.18	0	0
Developed land; sealed surface	16.73	16.73	0	0
Cereal crops	134.33	134.33	0	0
Total	182.59	181.90	0	0.69

Table 4: Habitats to be created as part of the Proposed Development

Baseline Habitat	Area (ha)	Length (km)
Modified Grassland	458.27	-
Other Neutral Grassland	27.72	-
Mixed scrub	2.95	-
Built linear features	9.31	-
Developed land; sealed surface	17.99	-
Native hedgerow		2.78
Total	516.24	2.78

Table 5: Lengths of hedgerow retention, enhancement, and loss arising from the Proposed Development

Baseline Habitat	Length (Km)	Retained (Km)	Enhanced (Km)	Lost (Km)
Solar Array Area				
Native hedgerow	3.92	2.54	1.38	0
Native hedgerow with trees	3.02	3.02	0	0
Species-rich native hedgerow	0.03	0.03	0	0
Total	6.97	5.59	1.38	0
Bespoke Access Corridor				
Line of trees	0.11	0.08	0	0.02
Species rich native hedgerow	1.57	1.42	0	0.16
Native hedgerow	1.56	1.40	0	0.15
Total	3.25	2.91	0	0.33
Cable Route Corridor				
Line of trees	1.74	1.74	0	0
Native hedgerow	2.35	2.35	0	0
Species rich native hedgerow	1.93	1.09	0	0
Total	6.02	6.02	0	0

2.5.15 A total of 2.78km native hedgerow will be created on the Solar Array Area.

Table 6: Lengths of ditches retention, enhancement, and loss arising from the Proposed Development

Baseline Habitat	Length (Km)	Retained (Km)	Enhanced (Km)	Lost (Km)
Solar Array Area				
Ditches	28.27	15.69	12.58	0
Bespoke Access Corridor				
Ditches	3.57	3.57	0	0
Cable Route Corridor				
Ditches	18.4	18.4	0	0

Constraints or Limitations

2.5.16 All baseline and post-development features have been measured in GIS/CAD using the Phase 1 habitat plan (in **Appendix 7.3 Preliminary Ecological Appraisal Document Ref: 6.3 ES Vol 2, 6.3.22** and **Figure 6.31 Landscape Strategy Plan Document Ref: 6.4 ES Vol 3, 6.4.42**) to determine habitat extents and lengths before and after development. Therefore, measurements should be regarded as approximations only.

3. RESULTS

3.1 Baseline unit values

- 3.1.1 The baseline unit values of the habitats present within the Order Limits have been calculated with the statutory BNG metric as having a baseline value of:
- 1959.44 Habitat units
 - 118.03 Hedgerow units
 - 243.79 Watercourse units

3.2 Post-development unit values

- 3.2.1 The post-development units have been calculated as having a value of:
- 2551.86 Habitat units
 - 130.77 Hedgerow units
 - 282.67 Watercourse units
- 3.2.2 A summary of the post development BNG metric calculations is presented in Appendix 2.

3.3 Trading rules

- 3.3.1 Following a review of the updated priority habitat mapping (Natural England 2025) showing additional priority habitats, the metric trading rules will need to be satisfied. There is an anticipated loss of 60.32 Habitat Units of Grassland - Floodplain wetland mosaic and CFGM which is not accounted for. This relates to land along Hodge Dyke which in the current Figure 6.31 Landscape Strategy Plan (APP-233) will be converted into modified grassland.
- 3.3.2 The CFGM habitat is proposed to be retained and enhanced to satisfy the trading rules for high distinctiveness habitats. This approach will require further discussion with stakeholders in line with biodiversity net gain good practice (Baker *et al.* 2019) so has not yet been included in this BNG strategy. This discussion has been ongoing, with meetings with the local authorities in February 2024 to discuss the biodiversity opportunities for the site. Details on the ground conditions (hydrology, soil type) as well as the vegetation management, will be provided to demonstrate how the enhanced habitat can be achieved. A habitat management and monitoring plan will set out this baseline information along with the proposed management, the monitoring schedule and targets for the habitat, and remedial action if targets are not met.
- 3.3.3 There is also a loss of 2.78 Habitat Units of Woodland and forest - Other woodland; broadleaved, and 0.39 Habitat units of Rural trees not accounted for in trading. These require creation or enhancement of medium distinctiveness or better woodland or individual trees to satisfy trading rules. Alternatively if the CFGM is enhanced to good condition, as a high distinctiveness habitat this will also cover the trading rules for woodland.

4. CONCLUSION

4.1.1 Based on the current plans for the Site, and using the current Statutory Metric in force (July 2024), the Proposed Development is anticipated to result in an overall percentage change of:

- 30.23% net gain in Habitat units;
- 10.79% net gain in Hedgerow units, and
- 15.95% net gain in Watercourse units.

4.1.2 As part of detailed design options will be demonstrated which will satisfy trading rules through retention or enhancement of Floodplain grazing marsh, and enhancement of existing woodland and tree planting. Further information will be provided on the current ground conditions and vegetation management to achieve this.

5. BNG IMPLEMENTATION

- 5.1.1 Delivery of the percentages of BNG specified in section 4 above, as a minimum, is secured through a requirement in Schedule 2 to the **Draft DCO (Document Ref: 3.1)**. The relevant requirement specifies that *"No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body. The biodiversity net gain strategy must be substantially in accordance with the outline landscape and ecological management plan and must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates."* This report has been prepared so that the level of BNG that the Proposed Development can be expected to deliver can be understood at this stage of the consenting process and to inform the preparation of the **OLEMP (Document Ref: 6.3 ES Vol 2, 6.3.19)**.
- 5.1.2 The obligation to prepare the detailed Landscape and Ecological Management Plan (LEMP) (or more than one LEMP if the Proposed Development is delivered in phases), and to have this/these approved by the relevant planning authority, is secured through a requirement in Schedule 2 to the **Draft DCO (Document Ref: 3.1)**. The detailed LEMP(s) will be developed from the principles set out in the OLEMP as it/they must be substantially in accordance with this OLEMP. The LEMP(s) will include information on establishment and long-term operational management of the landscape and ecological resource. The LEMP(s) will also describe the long-term management of ecological habitats required to achieve biodiversity net gain units.

6. HABITAT MANAGEMENT AND MONITORING

- 6.1.1 The **OLEMP (Document ref: 6.3 ES Vol 2, 6.3.19)** includes management and maintenance prescriptions and a commitment to undertake BNG habitat condition assessments and a review of management during years 1, 3 and 5 and then every 5 years for the remainder of the Proposed Development's operational life. Whilst BNG requires a commitment of 30 years management and monitoring this will occur across the lifetime of the Proposed Development (which will be up to 40 years).
- 6.1.2 At each monitoring interval a monitoring report will be produced and shared with the relevant stakeholders including the relevant planning authority.

7. REFERENCES

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- Wardell Armstrong (2025). Beacon Fen Solar Farm Preliminary Ecological Appraisal report.

BFEP Appendices

Appendix 1 – Baseline Habitats

Table 7: Habitats on site

Habitat	Area (Ha)	Distinctiveness	Condition	Strategic Significance	Biodiversity Units
Cereal crops	655.27	Low	N/A	Area/compensation not in local strategy /no local strategy	1310.53
Floodplain wetland mosaic and CFGM	4.37	High	Moderate	Area/compensation not in local strategy /no local strategy	60.32
Other neutral grassland	1.58	Medium	Good	Area/compensation not in local strategy /no local strategy	6.91
Other neutral grassland	44.79	Medium	Moderate	Area/compensation not in local strategy /no local strategy	358.29
Modified grassland	20.24	Low	Moderate	Area/compensation not in local strategy /no local strategy	80.95
Lowland mixed deciduous woodland	3.49	High	Good	Area/compensation not in local strategy /no local strategy	62.75
Lowland mixed deciduous woodland	0.67	High	Moderate	Area/compensation not in local strategy /no local strategy	5.40
Lowland mixed deciduous woodland	0.90	High	Poor	Area/compensation not in local strategy /no local strategy	8.05
Other woodland; broadleaved	2.60	Medium	Moderate	Area/compensation not in local strategy /no local strategy	20.84
Other woodland; broadleaved	2.53	Medium	Poor	Area/compensation not in local strategy /no local strategy	10.12
Ponds (non-priority habitat)	0.85	Medium	Good	Area/compensation not in local strategy /no local strategy	10.19
Ponds (non-priority habitat)	0.24	Medium	Moderate	Area/compensation not in local strategy /no local strategy	1.90
Mixed scrub	0.84	Medium	Moderate	Area/compensation not in local strategy /no local strategy	6.74

Developed land; sealed surface	18.49	Very low	N/A	Area/compensation not in local strategy /no local strategy	0.00
Artificial unvegetated, unsealed surface	1.78	Very low	N/A	Area/compensation not in local strategy /no local strategy	0.00
Rural Trees	1.01	Medium	Good	Area/compensation not in local strategy /no local strategy	4.84
Rural Trees	1.10	Medium	Moderate	Area/compensation not in local strategy /no local strategy	8.79
Rural Trees	0.71	Medium	Poor	Area/compensation not in local strategy /no local strategy	2.83

Table 8: Hedgerow habitats

Habitat	Length (Km)	Distinctiveness	Condition	Strategic Significance	Biodiversity Units
Native hedgerow	3.03	Low	Good	Area/compensation not in local strategy /no local strategy	19.23
Native hedgerow	3.35	Low	Moderate	Area/compensation not in local strategy /no local strategy	13.41
Native hedgerow	1.44	Low	Poor	Area/compensation not in local strategy /no local strategy	2.89
Native hedgerow with trees	3.02	Medium	Good	Area/compensation not in local strategy /no local strategy	36.21
Species-rich native hedgerow	3.20	Medium	Good	Area/compensation not in local strategy /no local strategy	38.41
Species-rich native hedgerow	0.30	Medium	Moderate	Area/compensation not in local strategy /no local strategy	2.40
Line of trees	0.63	Poor	Low	Area/compensation not in local strategy /no local strategy	1.26
Line of trees	0.55	Moderate	Low	Area/compensation not in local strategy /no local strategy	2.21

Table 9: Watercourse habitats

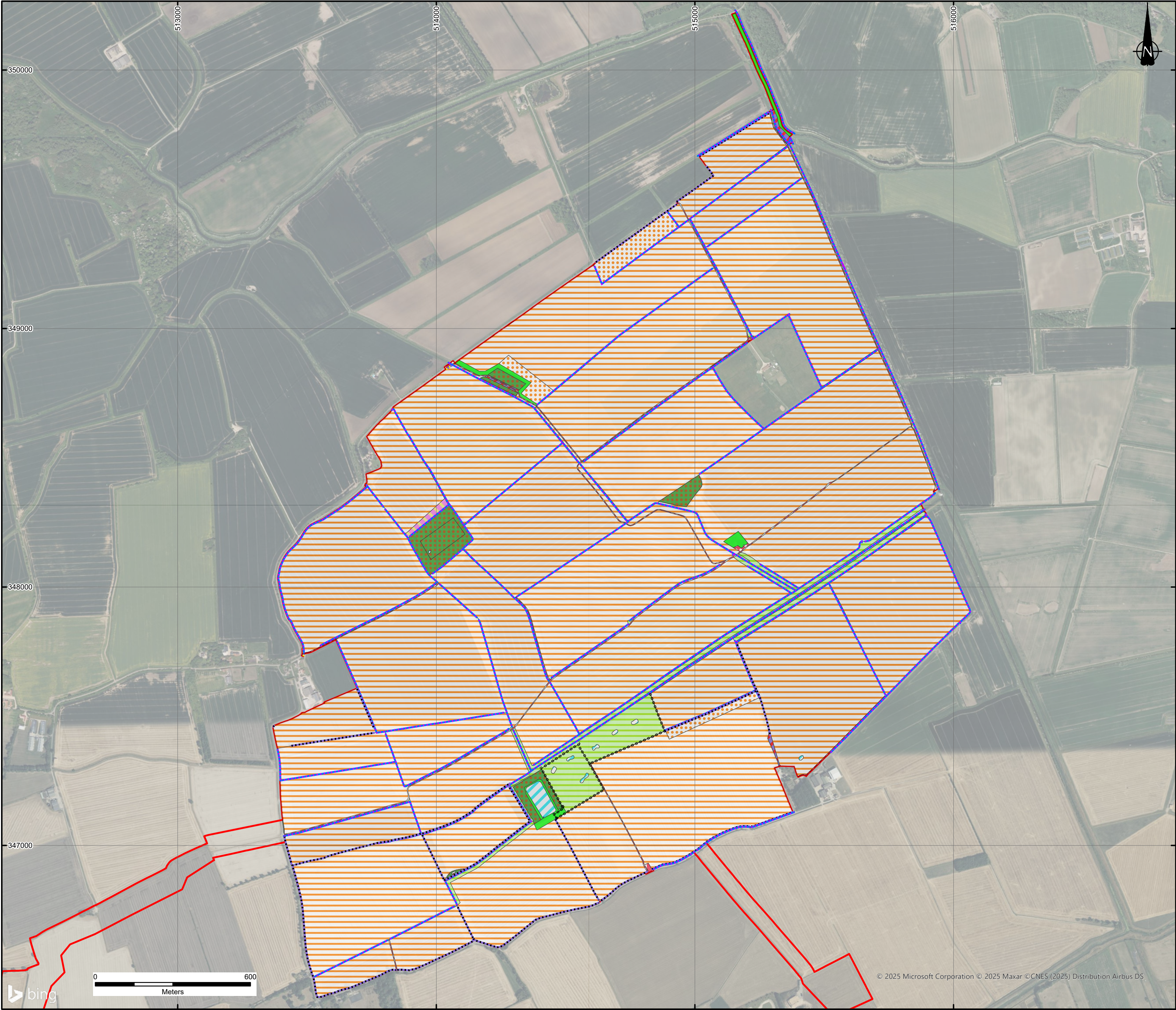
Habitat	Length (Km)	Distinctiveness	Condition	Strategic Significance	Biodiversity Units
Ditch	0.19	Medium	Good	'Formally identified in local strategy	2.39
Ditch	1.11	Medium	Good	Area/compensation not in local strategy /no local strategy	12.51
Ditch	21.55	Medium	Poor	Area/compensation not in local strategy /no local strategy	78.41
Ditch	6.72	Medium	Moderate	Area/compensation not in local strategy /no local strategy	51.06

Appendix 2 – Post Development Habitats

Table 10 Created habitats

Habitat	Area (ha)	Length (km)	Distinctiveness	Condition	Strategic Significance	Habitat/watercourse/hedgerow units
Habitat areas						
Lowland meadows	17.36		Very high	Good	Area/compensation not in local strategy/ no local strategy	80.57
Mixed scrub	2.96		Medium	Moderate	Area/compensation not in local strategy/ no local strategy	19.82
Lowland meadows	10.38		Very high	Good	Area/compensation not in local strategy/ no local strategy	48.16
Built linear features	9.28		Very low	N/A	Area/compensation not in local strategy/ no local strategy	0.00
Developed land; sealed surface	17.99		Very low	N/A	Area/compensation not in local strategy/ no local strategy	0.00
Other neutral grassland	13.14		Medium	Moderate	Area/compensation not in local strategy/ no local strategy	87.97
Modified grassland	461.08		Low	Moderate	Area/compensation not in local strategy/ no local strategy	1599.35
Watercourses						
Enhanced ditches		12.58	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	38.88
Hedgerows						
Enhanced hedgerows (Species rich)		0.87	Medium	Good	Area/compensation not in local strategy/ no local strategy	9.58
Enhanced hedgerows (Species rich)		0.51	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	3.72
Created hedgerows (Native hedgerow)		2.78	Low	Moderate	Area/compensation not in local strategy/ no local strategy	9.31

Drawings



KEY

- DCO Order Limits
- c1a - arable field margins
- c1c - cereal crops
- f2a - lowland fens
- g3c - other neutral grassland
- g4 - modified grassland
- h3h - mixed scrub
- r1 - standing open water and canals
- u1b - developed land, sealed surface
- u1b5 - buildings
- u1c - artificial unvegetated unsealed surface
- w1g - other woodland, broadleaved
- h2a5 - Species-rich native hedgerow
- r1e - canal or ditch
- h2a - Native hedgerow
- Fence

Notes:

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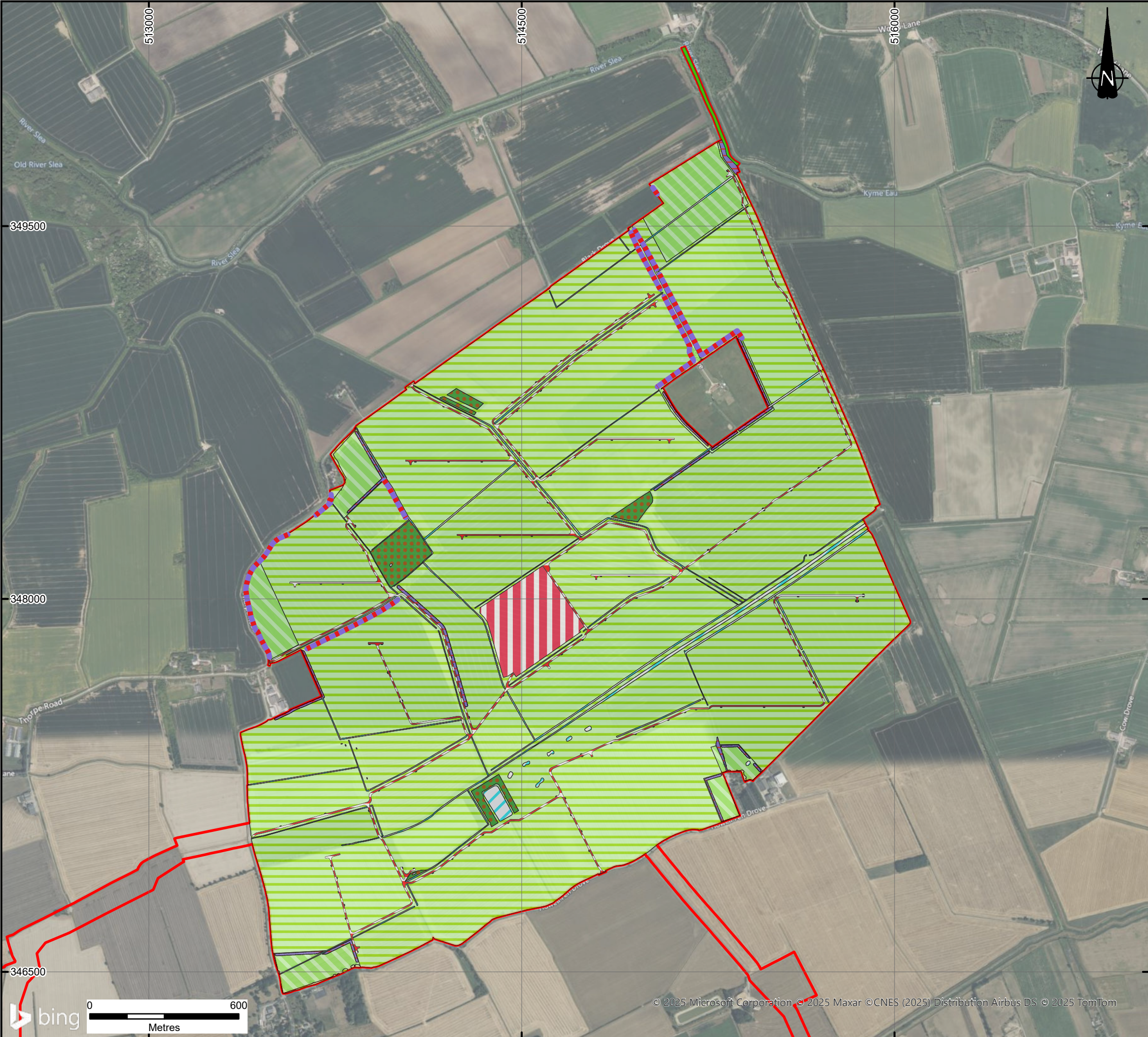
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KEY

- DCO Order Limits
- g3a - Lowland meadows
- g3c - Other neutral grassland
- g4 - Modified grassland
- h3h - Mixed scrub
- r1 - Standing open water and canals
- u1b - Developed land, sealed surface
- u1b5 - Buildings
- u1e - Built linear features
- w1g - Other broadleaved woodland
- Proposed Native Hedgerows

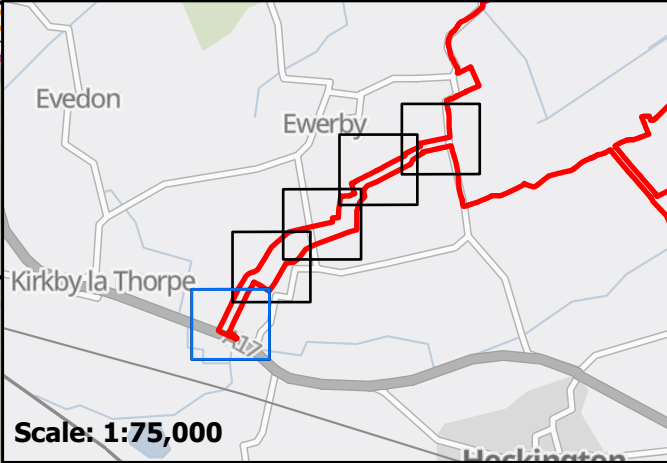
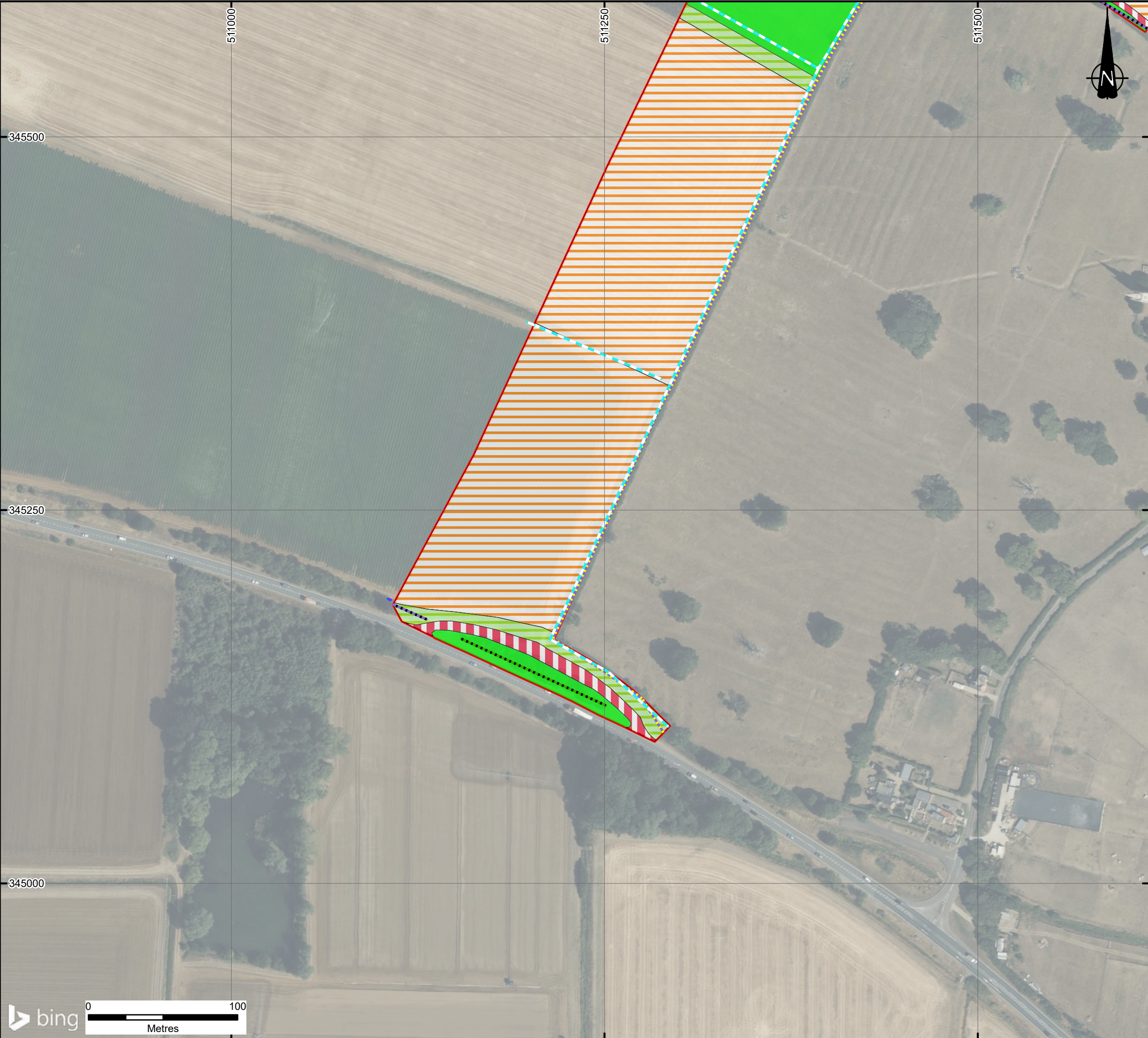
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KEY

c1c - Cereal crops

g3c - Other neutral grassland

g4 - Modified grassland

u1b - Developed land, sealed surface

h2a - Native hedgerow

h2a5 - Species-rich native hedgerow

r1e - canal or ditch

r2 - rivers and lakes

Line of trees

Notes:

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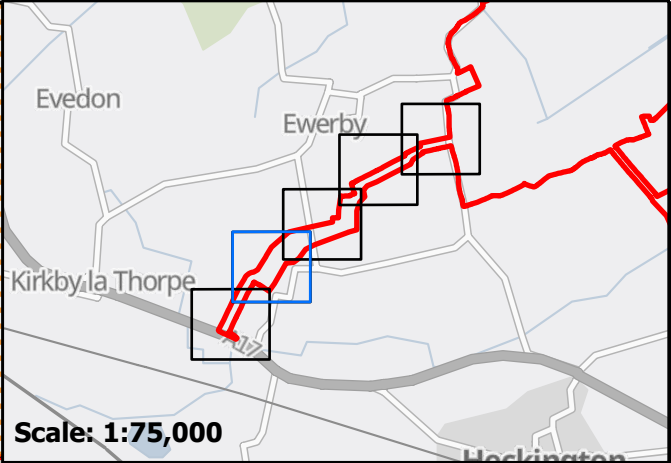
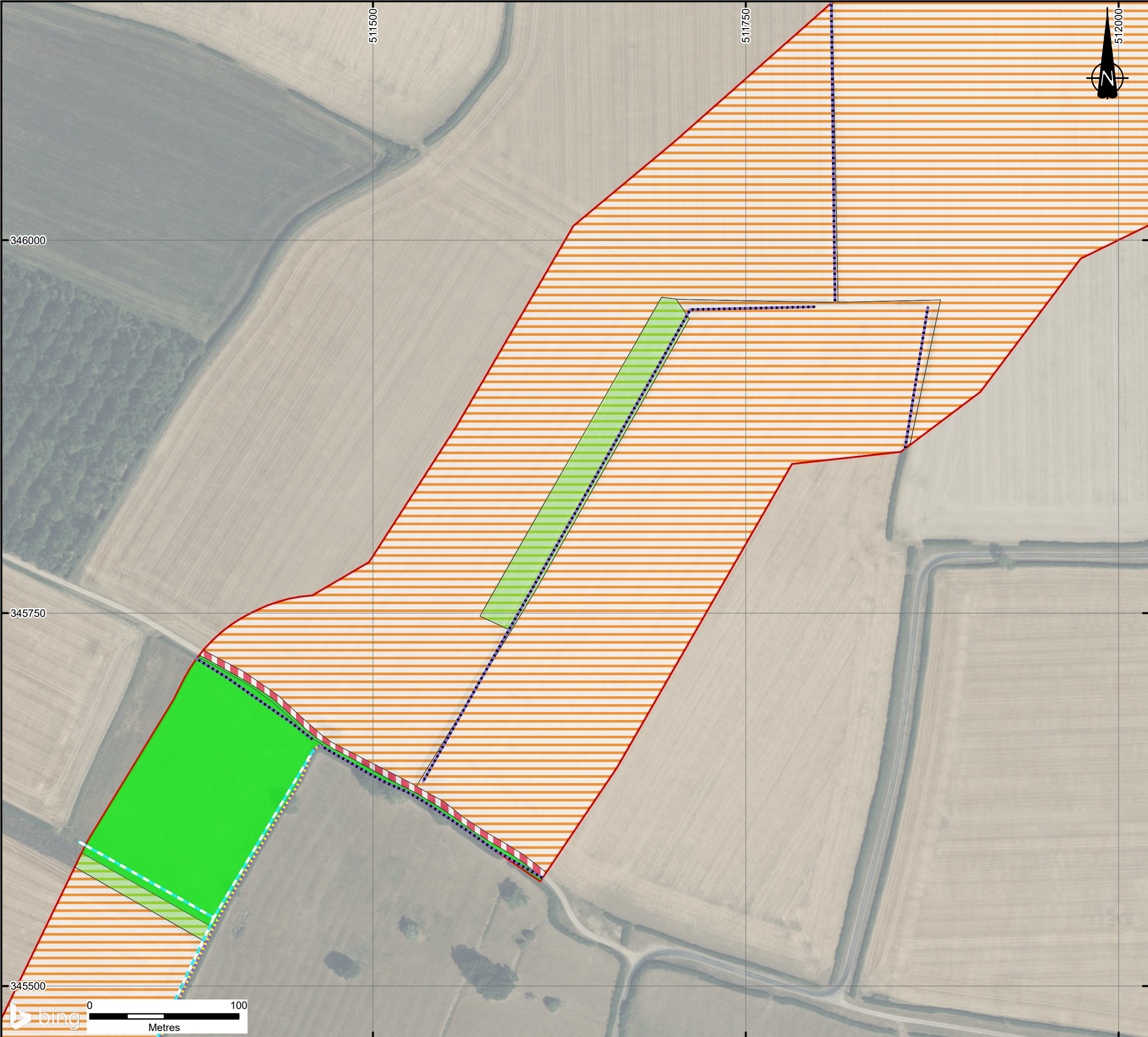


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KEY

- c1c - Cereal crops
- g3c - Other neutral grassland
- g4 - Modified grassland
- u1b - Developed land, sealed surface
- h2a - Native hedgerow
- h2a5 - Species-rich native hedgerow
- r2 - rivers and lakes

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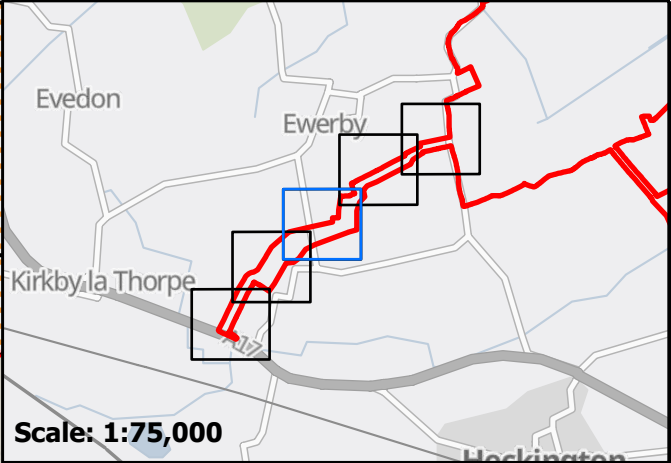
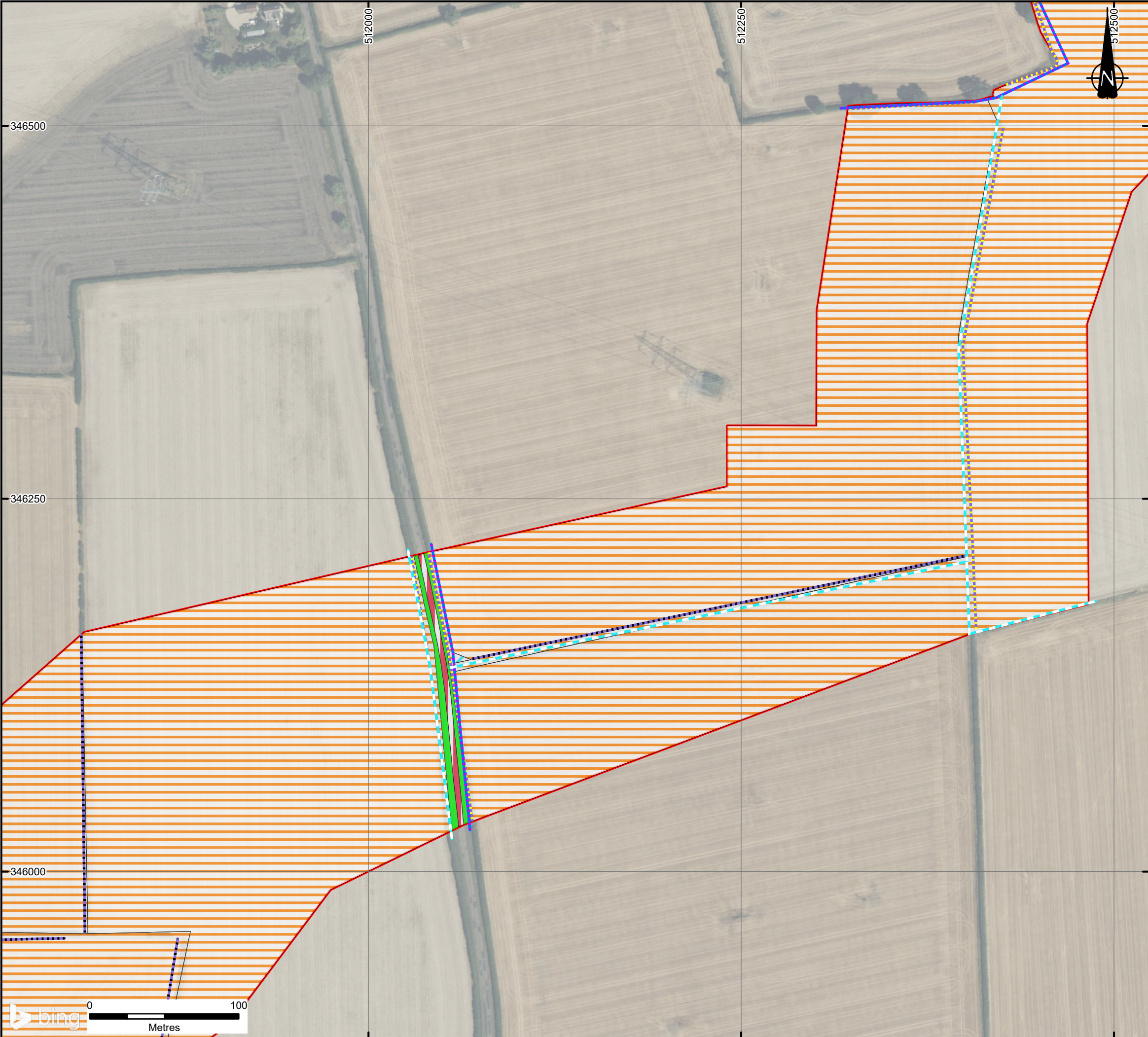
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KEY

- c1c - Cereal crops
- g4 - Modified grassland
- r1 - Standing open water and canals
- u1b - Developed land, sealed surface
- h2a - Native hedgerow
- h2a5 - Species-rich native hedgerow
- r1e - canal or ditch
- r2 - rivers and lakes

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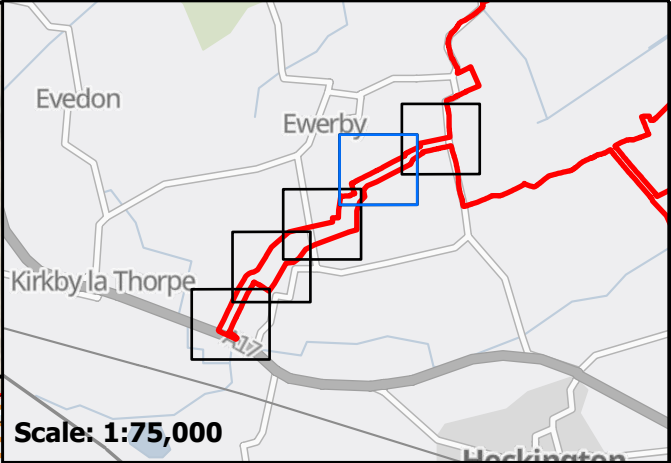
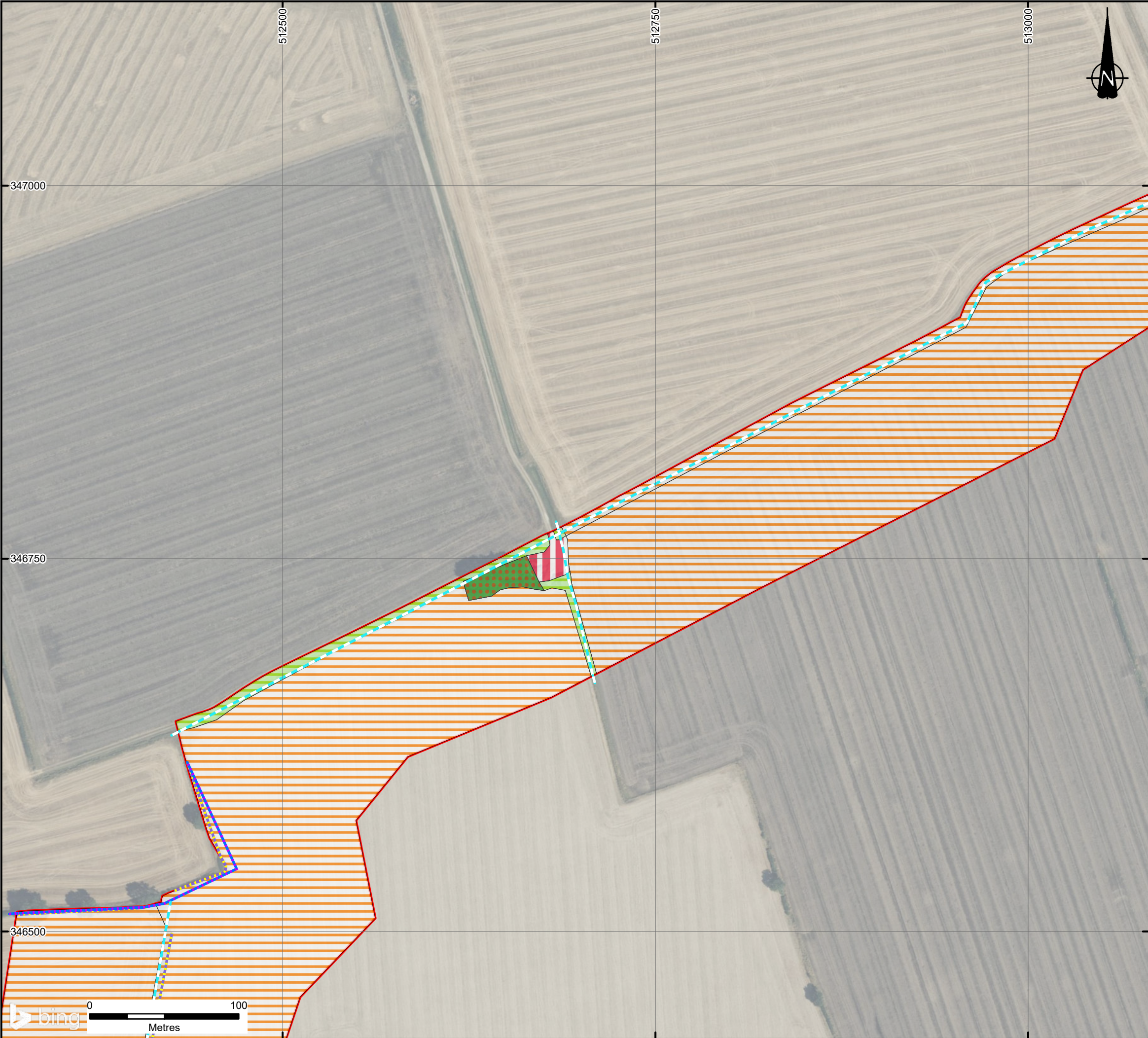
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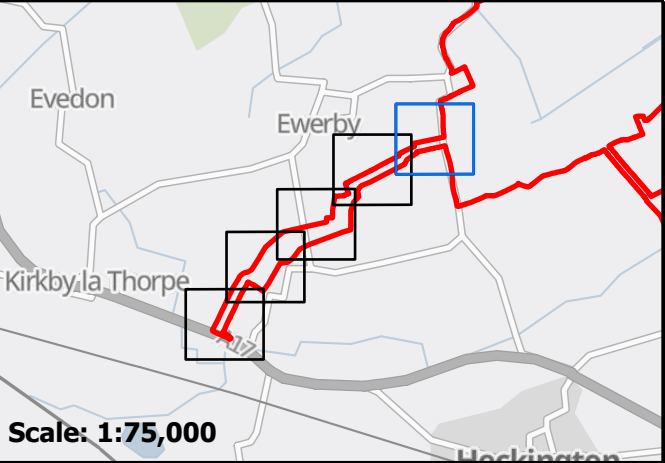
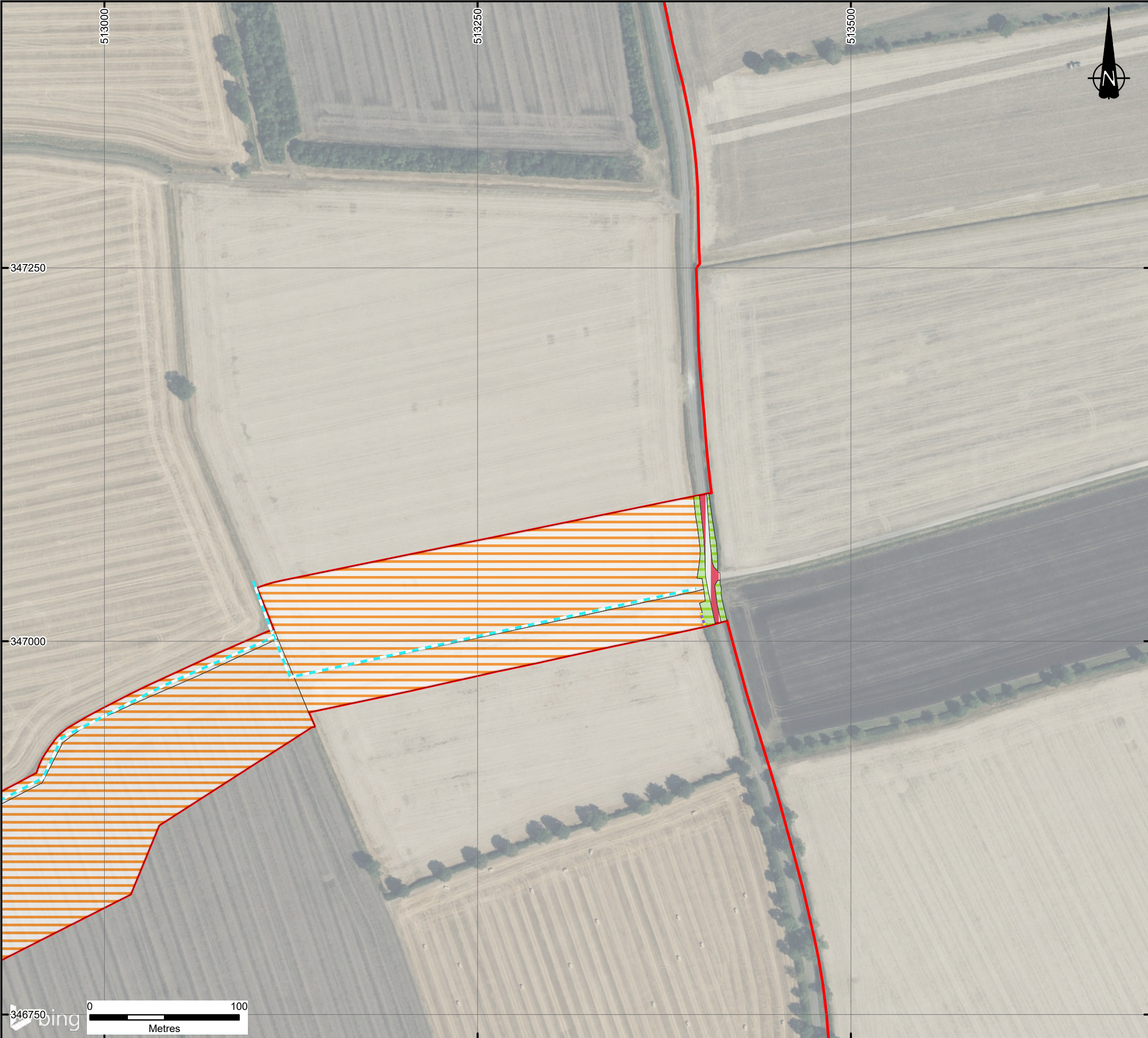


KEY

- c1c - Cereal crops
- g3c - Other neutral grassland
- u1b - Developed land, sealed surface
- w1g - Other broadleaved woodland
- h2a5 - Species-rich native hedgerow
- r1e - canal or ditch
- r2 - rivers and lakes

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KEY	
	c1c - Cereal crops
	g3c - Other neutral grassland
	u1b - Developed land, sealed surface
	h2a5 - Species-rich native hedgerow
	r2 - rivers and lakes

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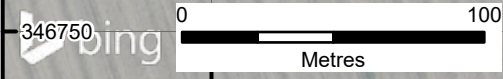
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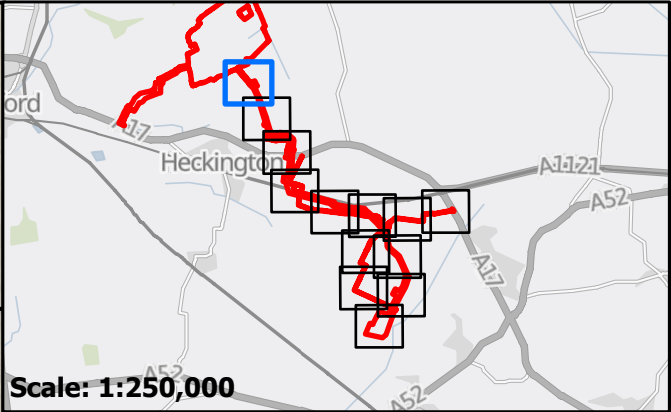
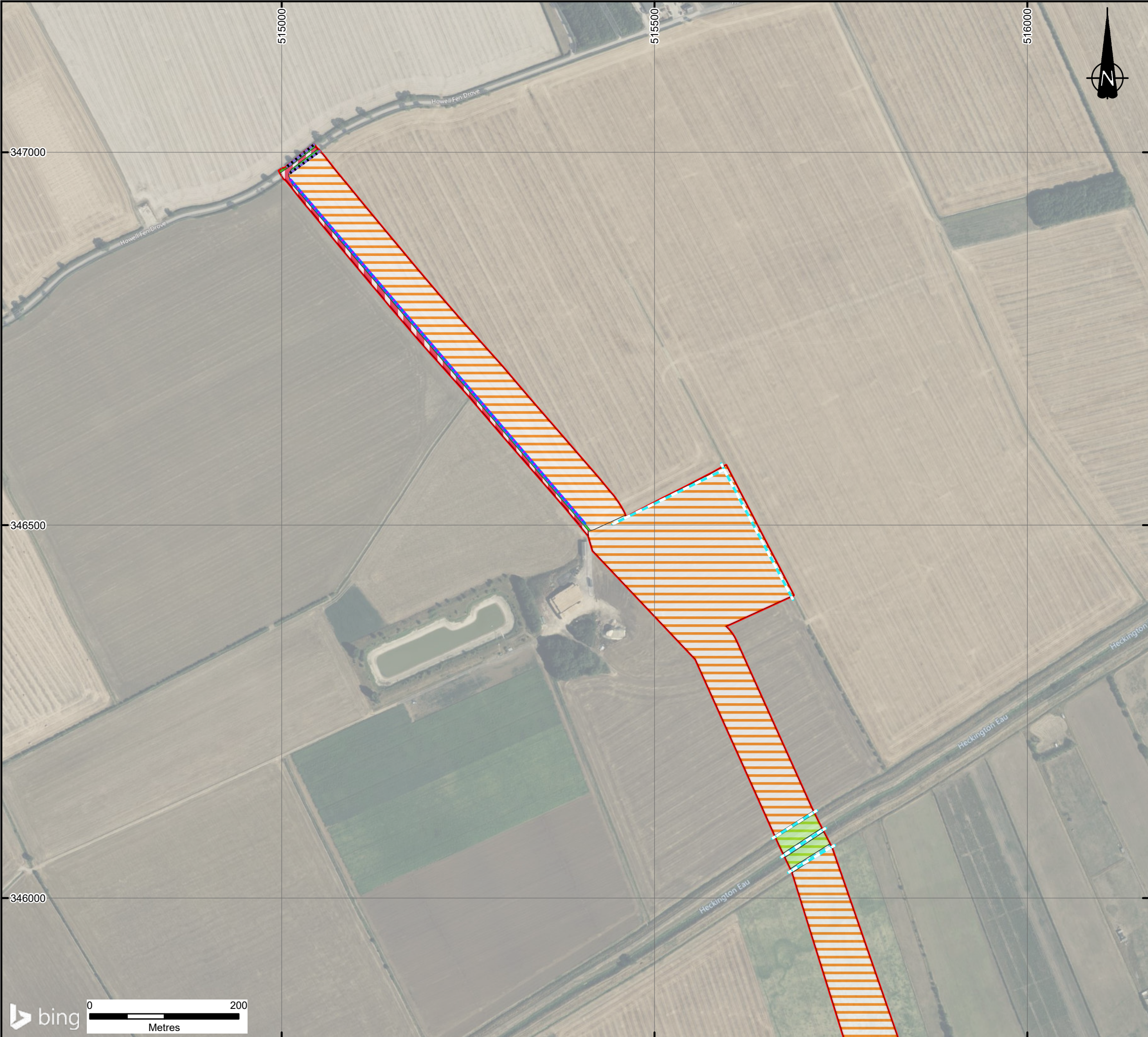
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KEY	
	DCO Order Limits
	c1c - Cereal crops
	g3c - Other neutral grassland
	g4 - Modified grassland
	r1a - Eutrophic standing waters
	u1b - Developed land, sealed surface
	h2a - Native hedgerow
	r1e - canal or ditch
	r2 - rivers and lakes

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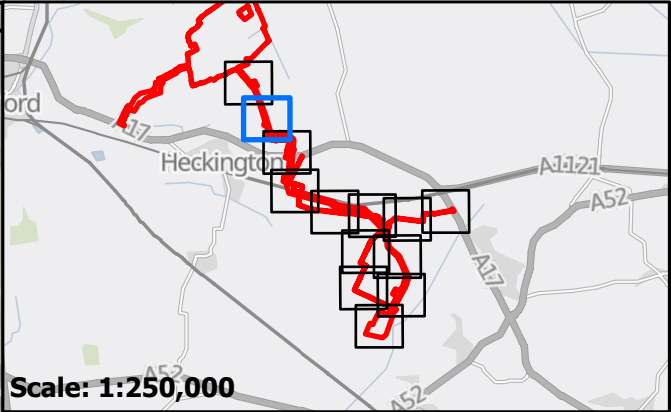
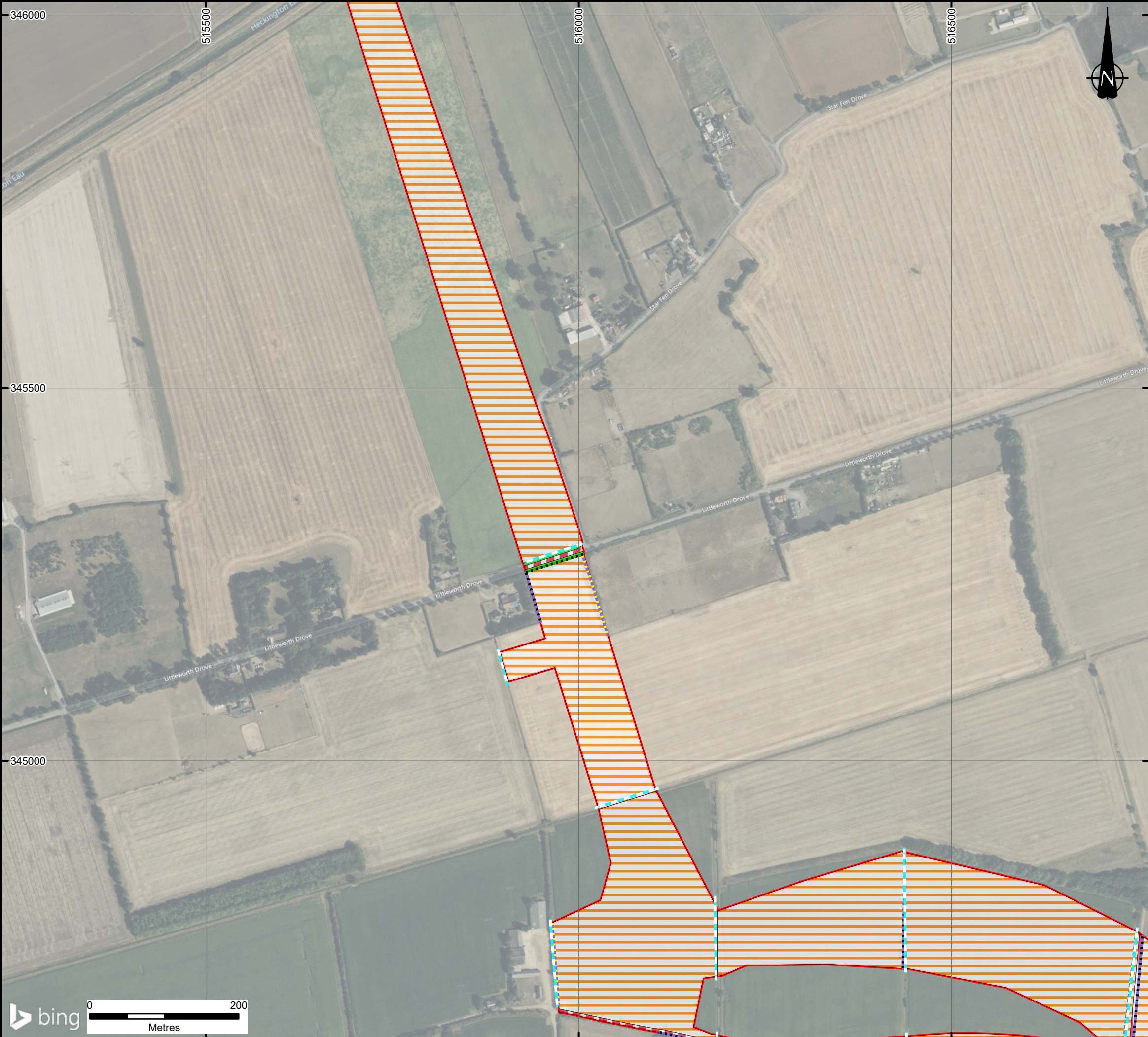
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KEY	
	DCO Order Limits
	c1c - Cereal crops
	g4 - Modified grassland
	u1b - Developed land, sealed surface
	f2d - Aquatic marginal vegetation
	h2a - Native hedgerow
	h2a5 - Species-rich native hedgerow
	r2 - rivers and lakes
	Line of trees (V1)

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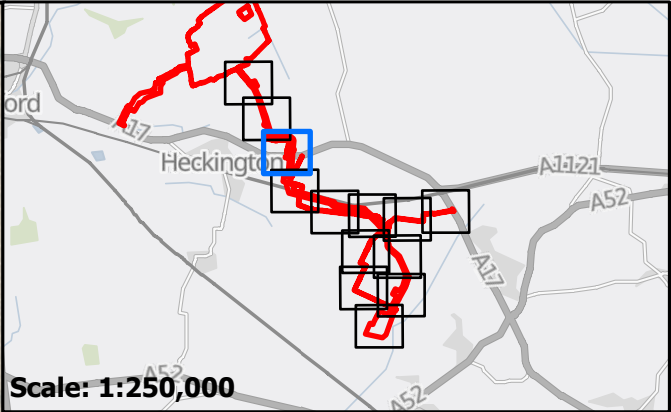
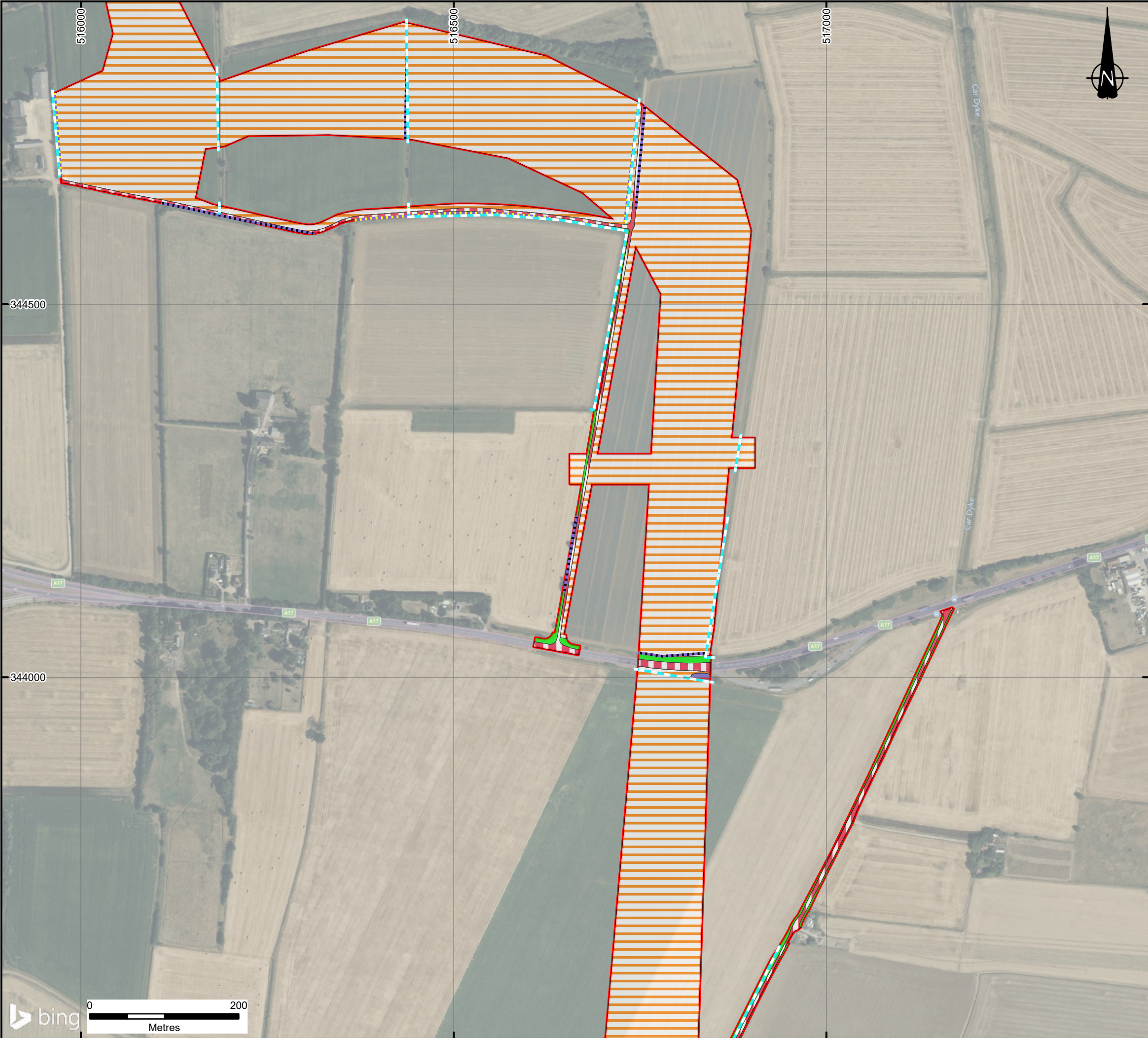
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	DCO Order Limits
	c1c - Cereal crops
	g4 - Modified grassland
	h3h - Mixed scrub
	u1b - Developed land, sealed surface
	h2a - Native hedgerow
	h2a5 - Species-rich native hedgerow
	r2 - rivers and lakes

Notes:
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PROJECT

BEACON FEN ENERGY PARK

DRAWING TITLE

UKHAB HABITAT PLAN
CABLE ROUTE CORRIDOR
SHEET 3 OF 13

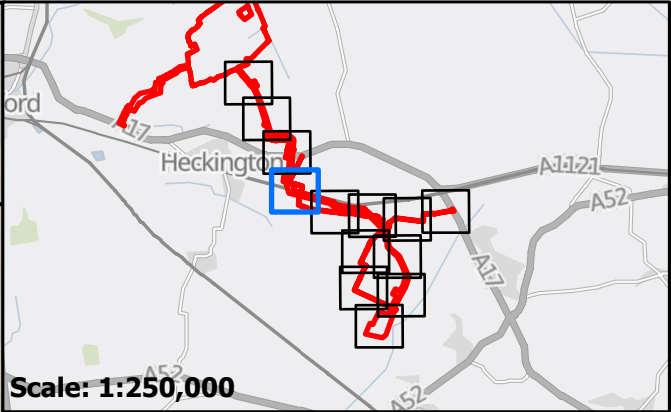
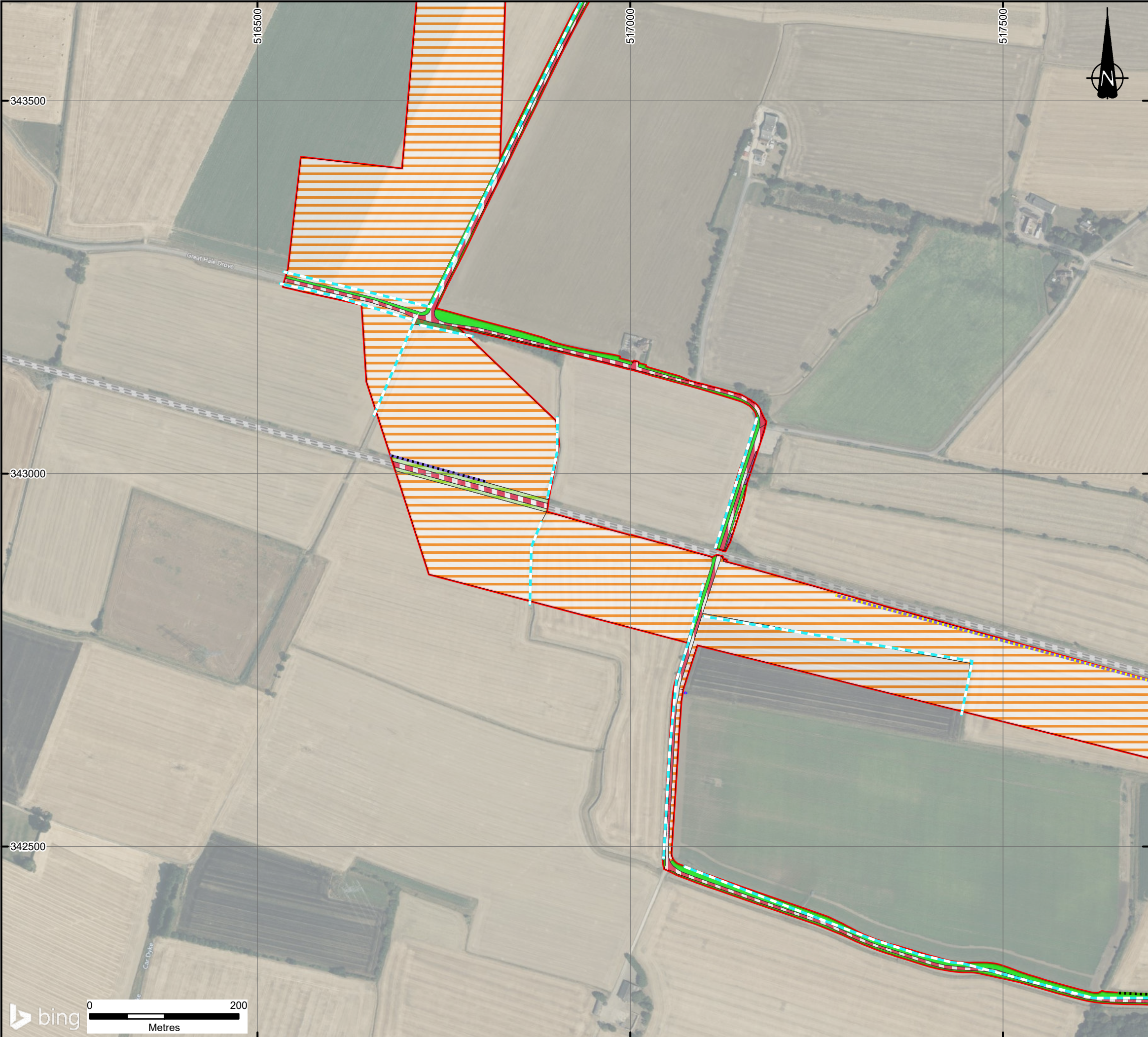
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KEY

	DCO Order Limits		w1g - Other broadleaved woodland
	c1c - Cereal crops		h2a - Native hedgerow
	g3c - Other neutral grassland		h2a5 - Species-rich native hedgerow
	g4 - Modified grassland		r1e - canal or ditch
	h3h - Mixed scrub		r2 - rivers and lakes
	u1b - Developed land, sealed surface		Line of trees (V1)

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UKHAB HABITAT PLAN
CABLE ROUTE CORRIDOR
SHEET 4 OF 13

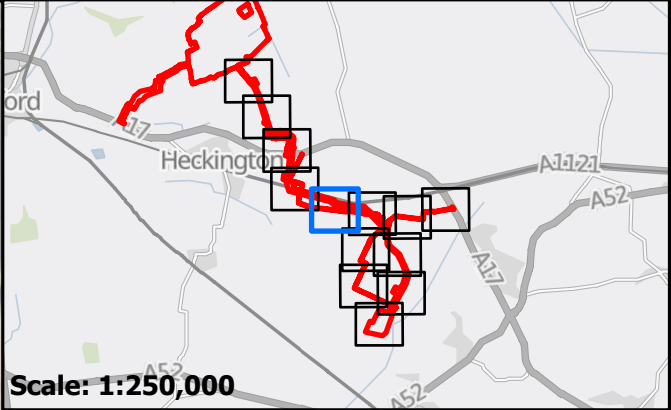
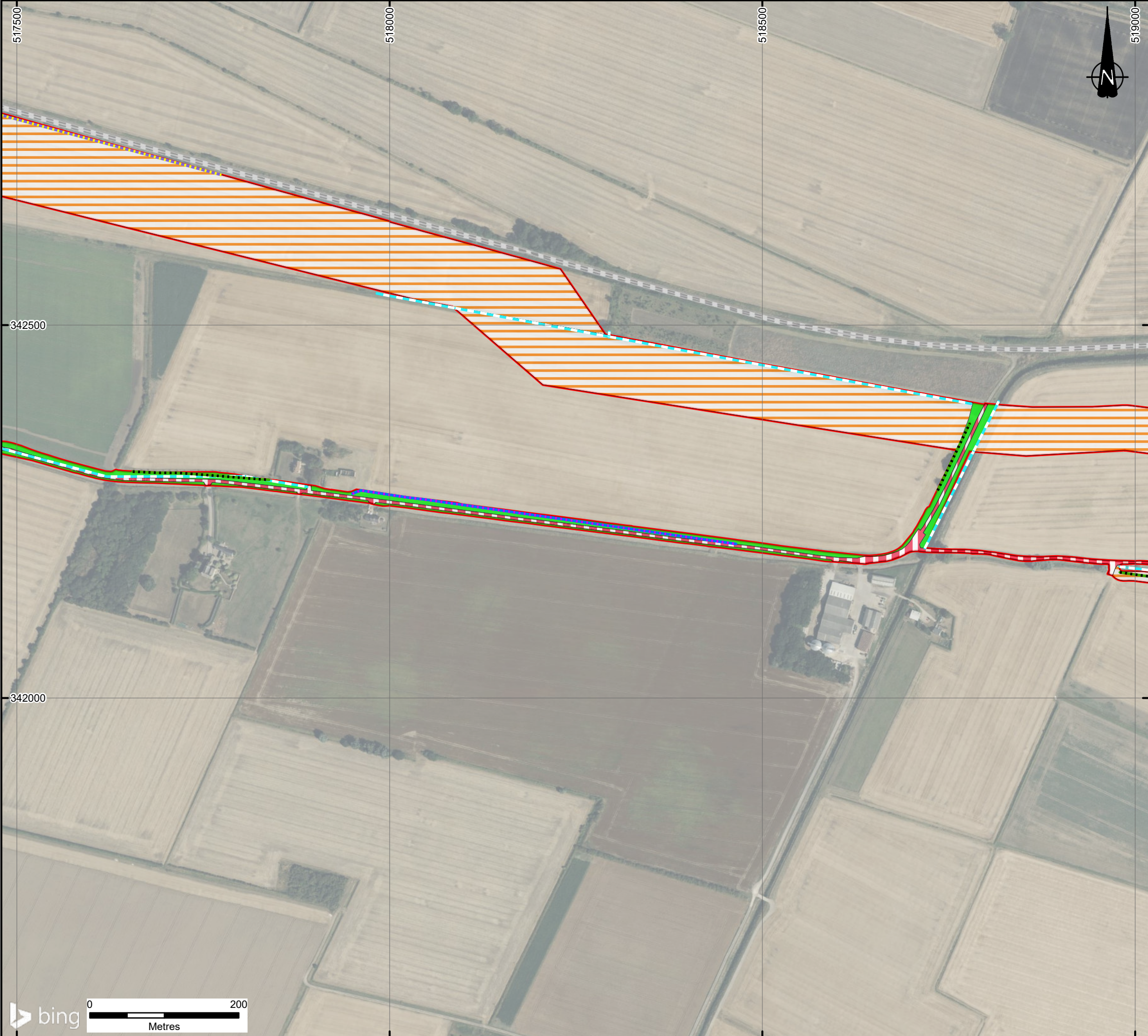
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Scale: 1:250,000

KEY

	DCO Order Limits		h2a5 - Species-rich native hedgerow
	c1c - Cereal crops		r1e - canal or ditch
	g4 - Modified grassland		r2 - rivers and lakes
	u1b - Developed land, sealed surface		Line of trees (V1)

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CABLE ROUTE CORRIDOR
SHEET 5 OF 13

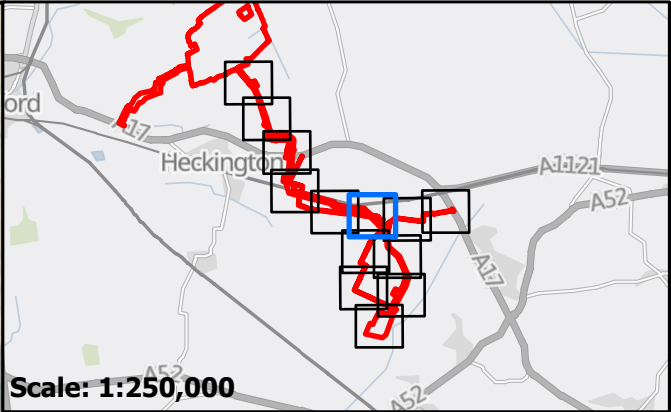
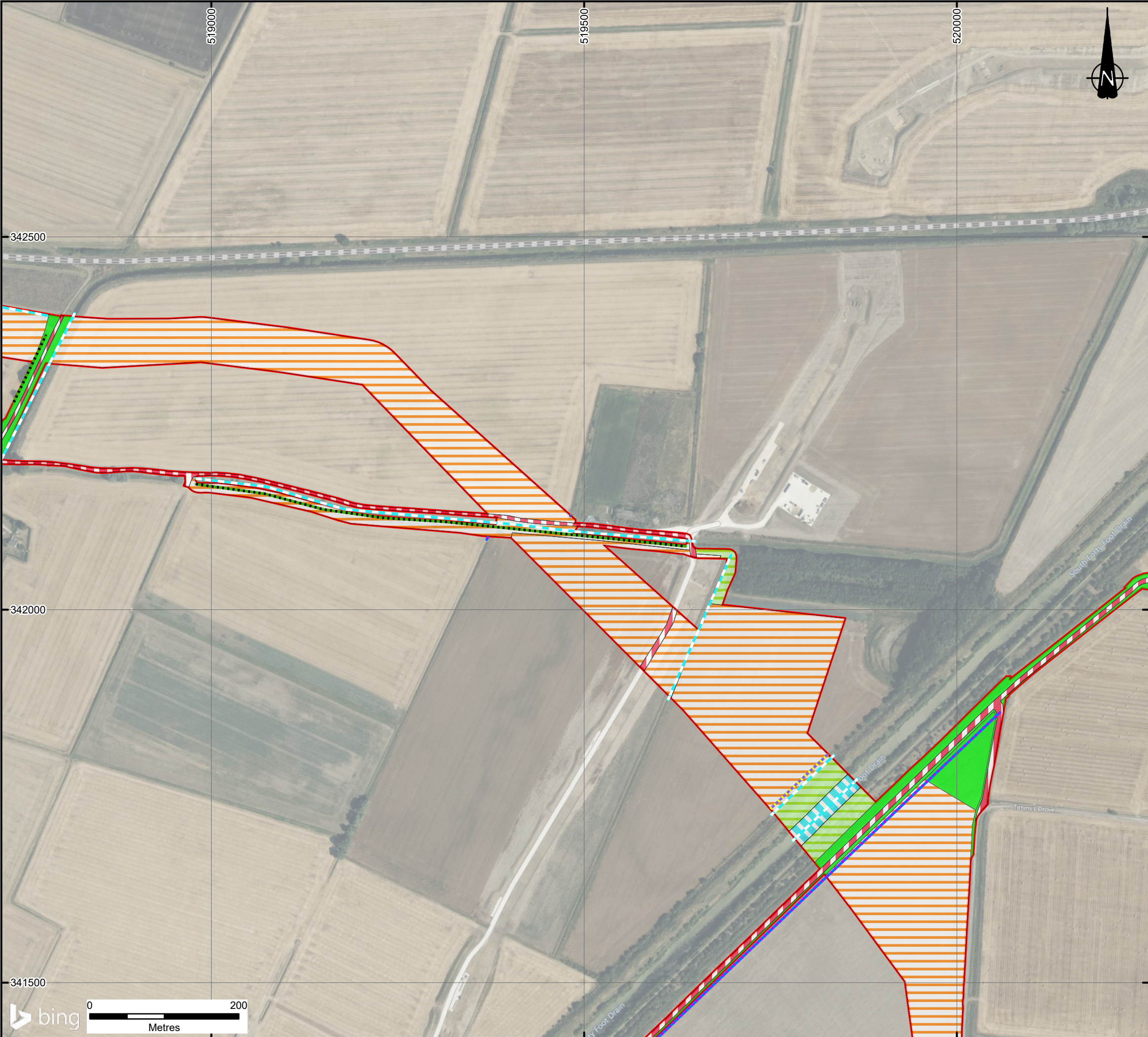
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KEY	
	DCO Order Limits
	c1c - Cereal crops
	g3c - Other neutral grassland
	g4 - Modified grassland
	r1a - Eutrophic standing waters
	u1b - Developed land, sealed surface
	h2a - Native hedgerow
	h2a5 - Species-rich native hedgerow
	r1e - canal or ditch
	r2 - rivers and lakes
	Line of trees (V1)

Notes:
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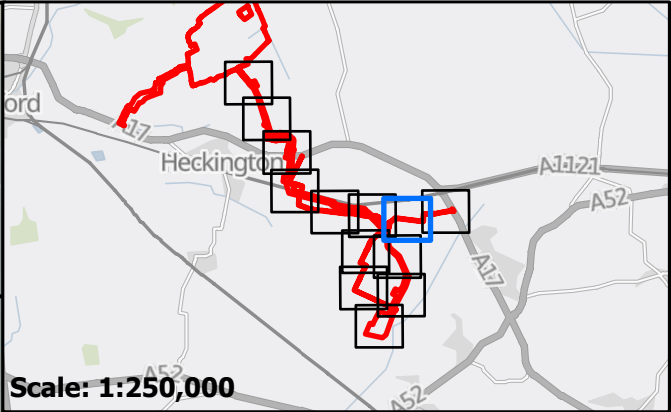
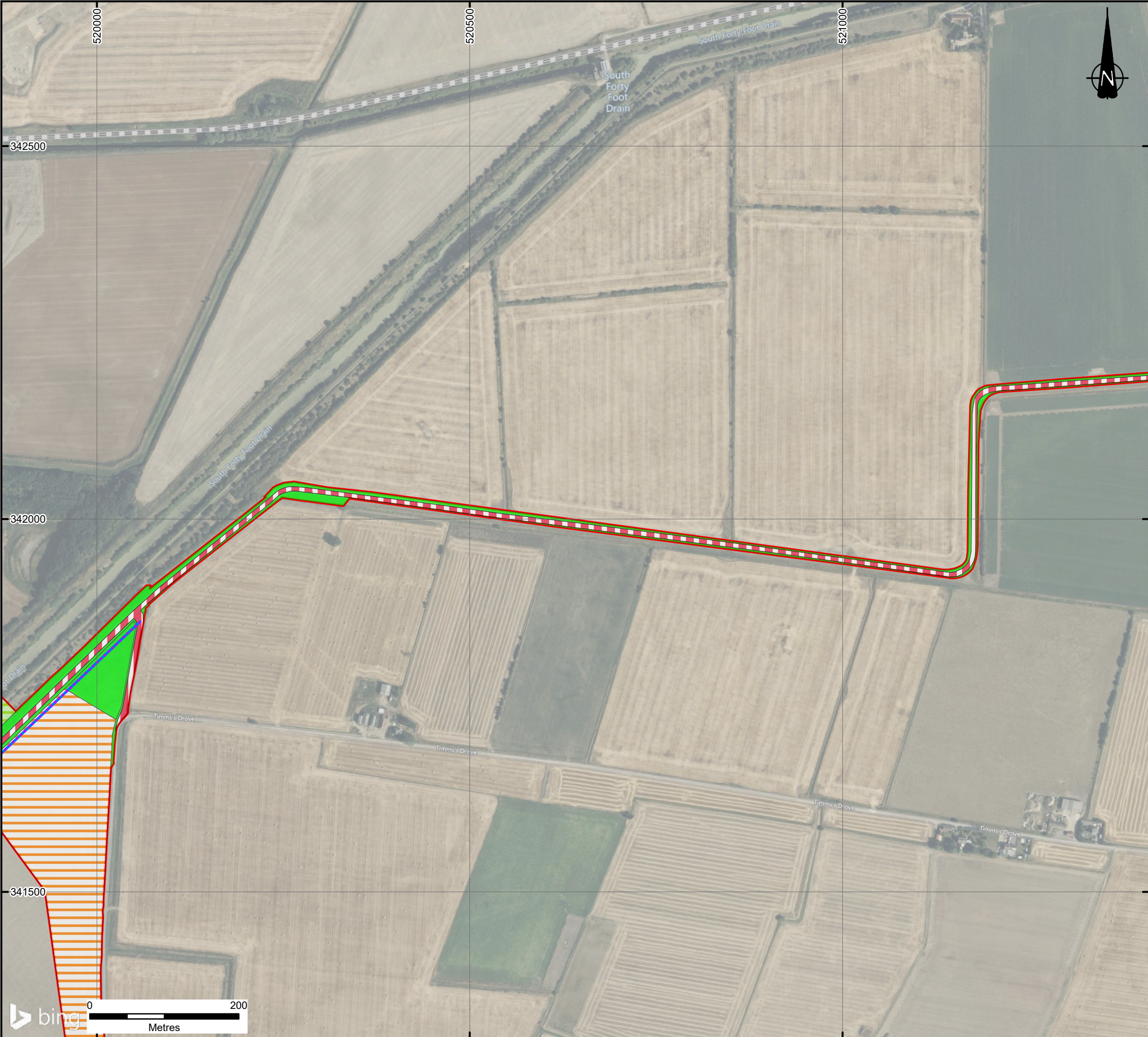
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**UKHAB HABITAT PLAN
CABLE ROUTE CORRIDOR
SHEET 6 OF 13**

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KEY	
	DCO Order Limits
	c1c - Cereal crops
	g3c - Other neutral grassland
	g4 - Modified grassland
	u1b - Developed land, sealed surface
	r1e - canal or ditch

Notes:
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UKHAB HABITAT PLAN
CABLE ROUTE CORRIDOR
SHEET 7 OF 13

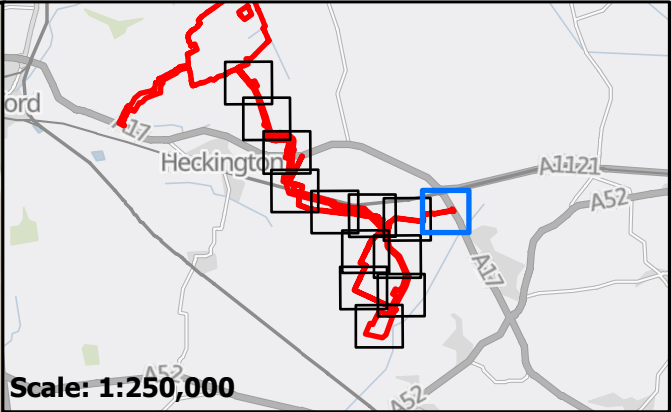
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KEY

DCO Order Limits

u1b - Developed land, sealed surface

g4 - Modified grassland

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UKHAB HABITAT PLAN
CABLE ROUTE CORRIDOR
SHEET 8 OF 13

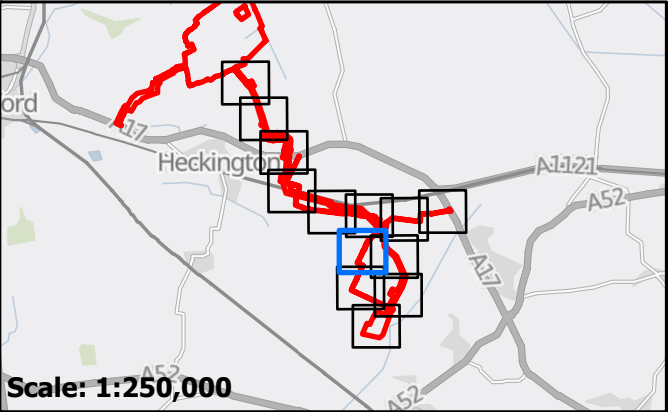
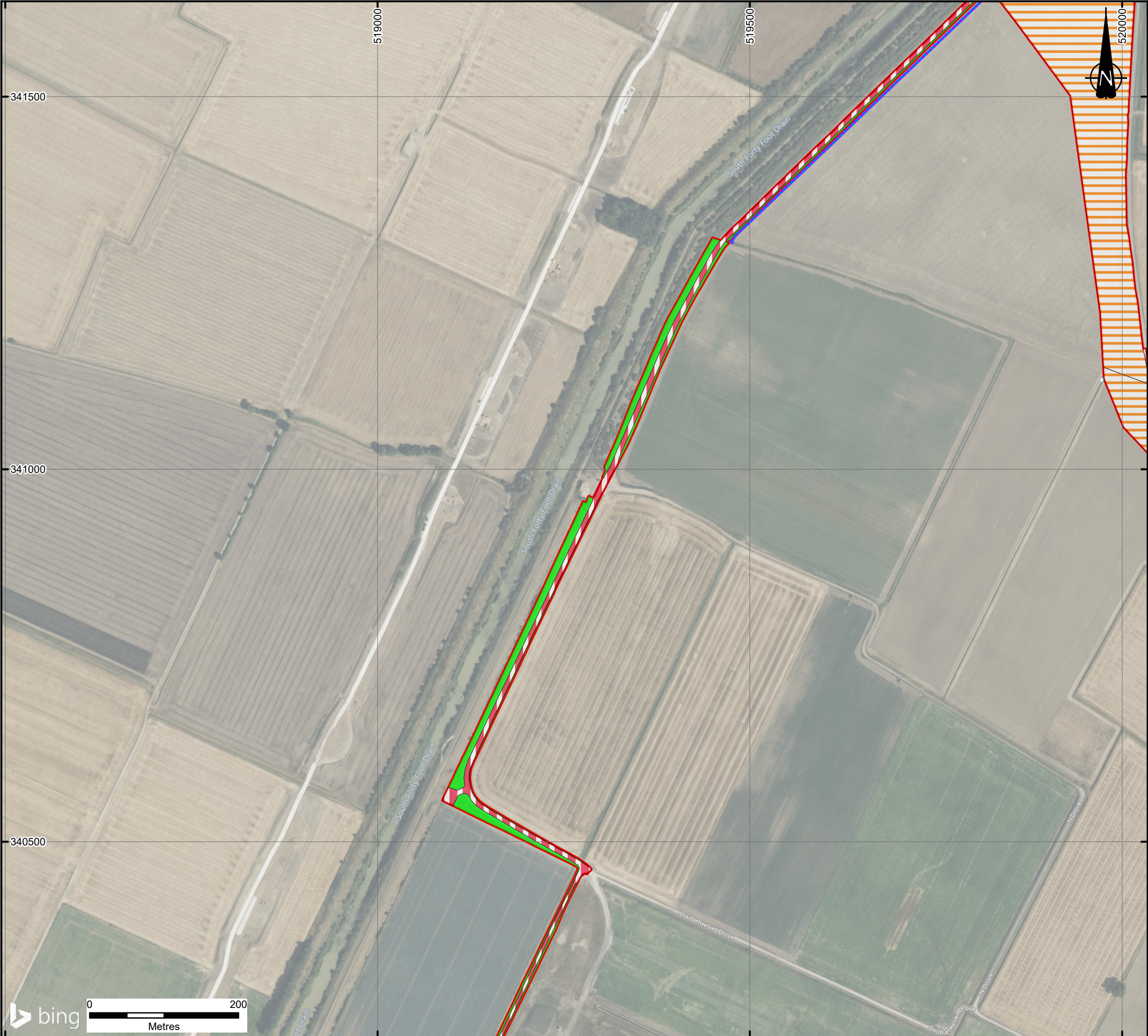
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KEY	
	DCO Order Limits
	c1c - Cereal crops
	g4 - Modified grassland
	u1b - Developed land, sealed surface
	r1e - canal or ditch
	r2 - rivers and lakes

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UKHAB HABITAT PLAN
CABLE ROUTE CORRIDOR
SHEET 9 OF 13

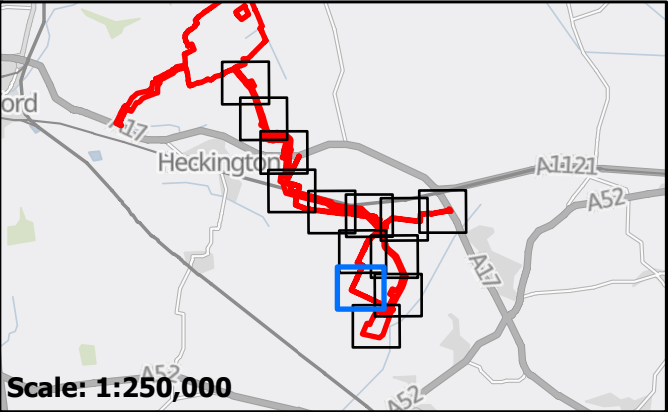
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Scale: 1:250,000

KEY

	DCO Order Limits		r1e - canal or ditch
	g4 - Modified grassland		r2 - rivers and lakes
	u1b - Developed land, sealed surface		Line of trees (V1)

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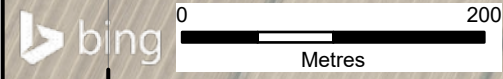
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CABLE ROUTE CORRIDOR
SHEET 10 OF 13

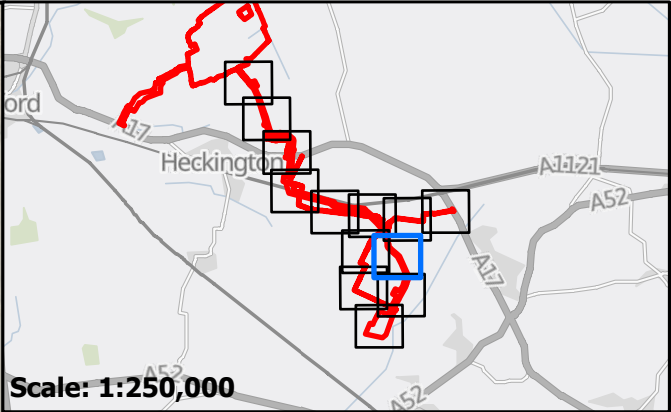
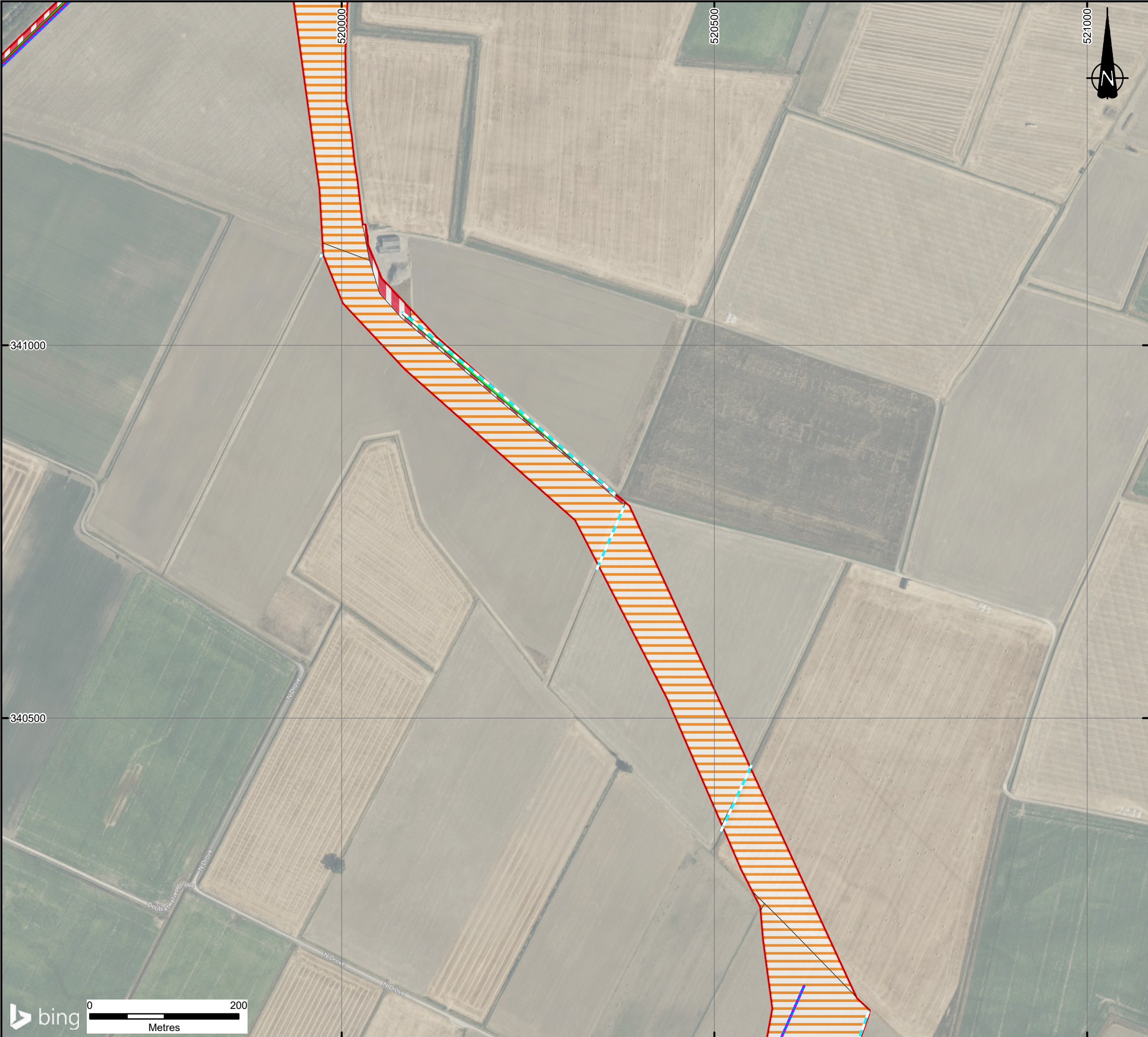
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KEY

DCO Order Limits	u1b - Developed land, sealed surface
c1c - Cereal crops	r1e - canal or ditch
g4 - Modified grassland	r2 - rivers and lakes

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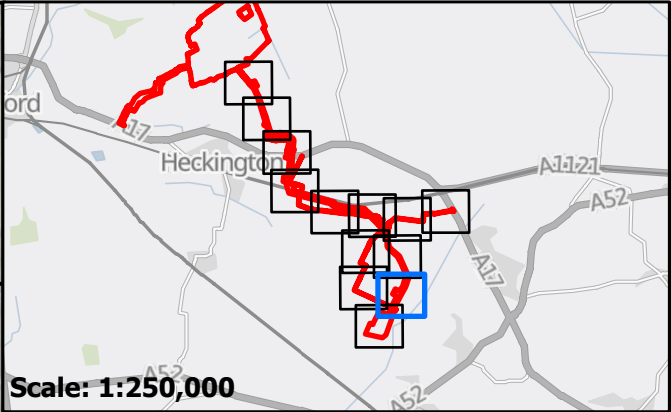
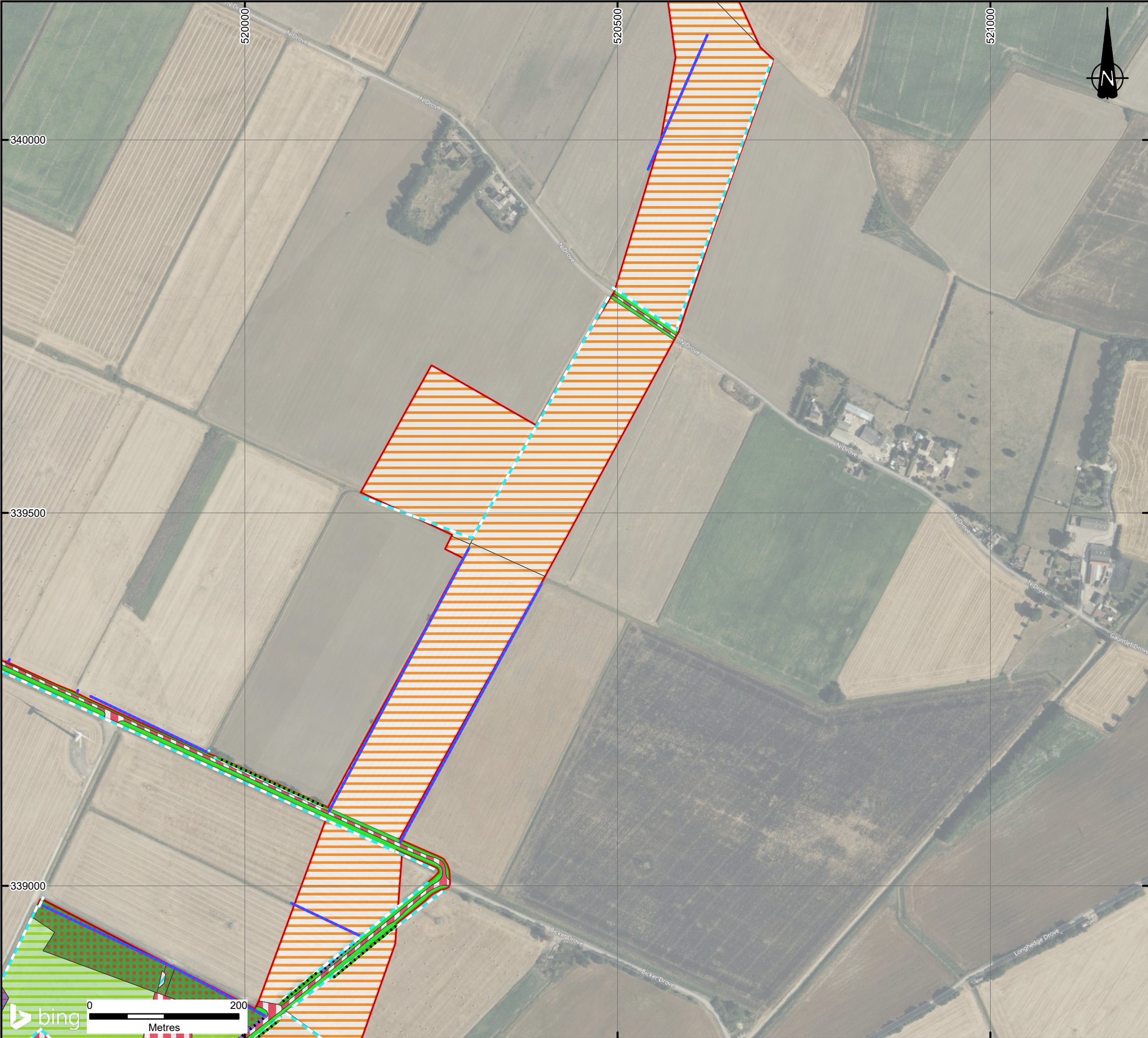
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UKHAB HABITAT PLAN
CABLE ROUTE CORRIDOR
SHEET 11 OF 13

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KEY	
 DCO Order Limits	 u1b - Developed land, sealed surface
 c1c - Cereal crops	 w1g - Other broadleaved woodland
 g3c - Other neutral grassland	 h2a - Native hedgerow
 g4 - Modified grassland	 r1e - canal or ditch
 h3h - Mixed scrub	 r2 - rivers and lakes
 r1 - Standing open water and canals	 Line of trees (V1)

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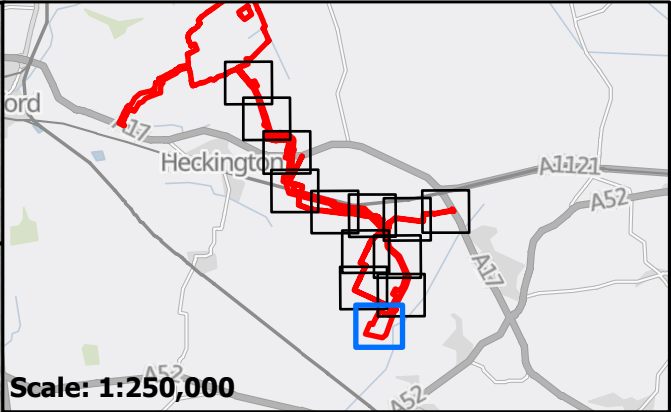
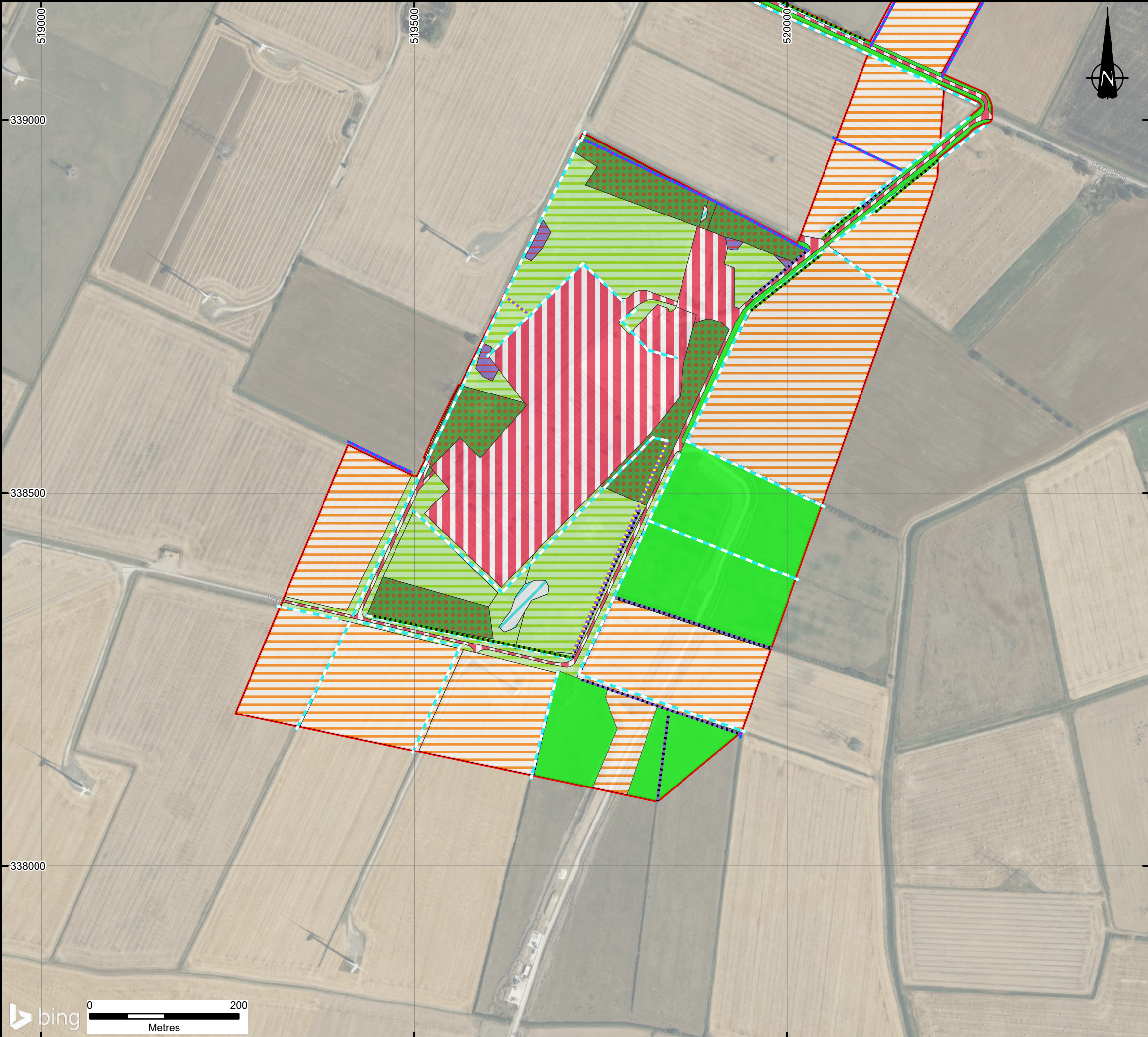
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CABLE ROUTE CORRIDOR
SHEET 12 OF 13

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KEY	
DCO Order Limits	u1b - Developed land, sealed surface
c1c - Cereal crops	w1g - Other broadleaved woodland
g3c - Other neutral grassland	h2a - Native hedgerow
g4 - Modified grassland	h2a5 - Species-rich native hedgerow
h3h - Mixed scrub	r1e - canal or ditch
r1 - Standing open water and canals	r2 - rivers and lakes
r1b - Mesotrophic lakes	Line of trees (V1)

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UKHAB HABITAT PLAN
CABLE ROUTE CORRIDOR
SHEET 13 OF 13

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