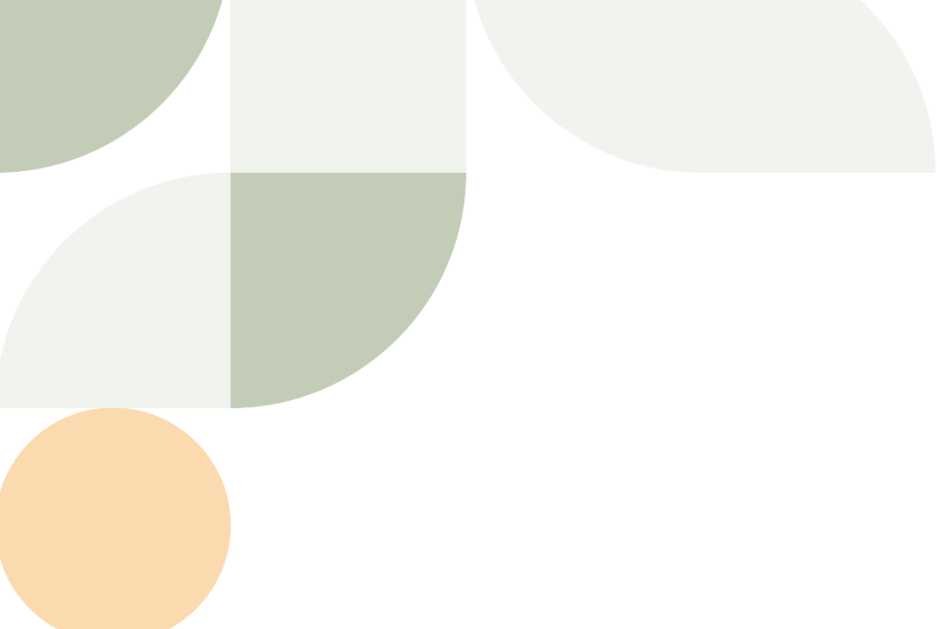




Lime Down

Solar Park

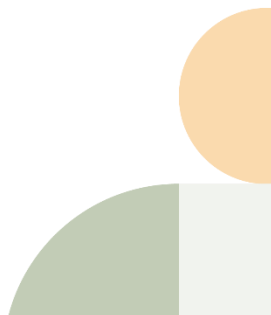
Applicant's Response to EB2.12 – Biodiversity Net Gain & Additionality Technical Note

August 2026

Planning Inspectorate Reference: EN010168

Document Reference: APP/ 9.67

APFP Regulation 5(2)(a)



List of Contents

1	Introduction.....	1
1.2	Additionality	1
2	Area-Based Habitat	3
3	Hedgerows	7
3.2	Watercourses.....	19

List of Tables

Table 1: Mitigation, Compensation & Enhancement Measures in Relation to BNG Additionality	2
Table 2: Area-Based Habitat Identified as Delivering Species-Specific Mitigation	4
Table 3: Proportion of HU Assigned to Specific Mitigation Measures and Additional Habitats	6
Table 4: Hedgerow Habitat Identified as Delivering Mitigation for Temporary Hedgerow Losses	8
Table 5: Hedgerow Habitat Identified as Requiring Compensation for Temporary & Permanent Hedgerow Losses	11
Table 6: Proposed Post-Development Hedgerow Units	13
Table 7: Proportion of HeU Assigned to Specific Mitigation & Compensation Measures and Additional Hedgerow Habitats	18
Table 8: Proposed Post-Development Watercourse Units	20

1 Introduction

- 1.1.1 This document has been prepared in response to the **Examining Authority's Second Written Questions (ExQ2) [PD-014]** issued on 27 July 2026, specifically with reference to Question EB2.12 which states the following:

'Biodiversity Net Gain (BNG)

To ensure that there is no double counting of BNG, and confusing this with mitigation, the applicant is requested to provide additional clarification as to which measures/ proposed habitat creation fall within each of the relevant categories. To ensure clarity and future ease of monitoring you are requested to provide this information in a single document that details:

- the type and quantum of habitat types that are being lost and the type and quantum of habitats and measures for species that are being replaced/ developed, and*
- state where these new sites will be (field numbers, for example), and whether this will represent mitigation, compensation, enhancement or BNG.*

For linear features such as hedgerows this information should, as far as possible at this stage, be broken down into figures for each individual length of hedgerow that is proposed to be removed and figures for what is proposed to be re-planted at the original location or to be compensated for with planting elsewhere.

Whilst the ExA appreciates that the full details might not be available until the detailed design stage, the applicant is requested to provide its best estimate prior to detailed design, based on what has been assessed in the ES. The ExA considers that a table format would best present this information.'

- 1.1.2 This Technical Note sets out the approach to habitat and species-specific mitigation across the Scheme, and how this relates to the corresponding BNG calculations, as provided in **7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [REP4-047]** and detailed within **7.8 Biodiversity Net Gain Assessment Report [REP4-045]**.

1.2 Additionality

- 1.2.1 Scheme design and BNG calculations have been informed by CIEEM's 'Biodiversity Net Gain: Good Practice Principles for Development' (2016), including Principle 7 '*Be Additional*', which states that developments should seek to achieve nature conservation outcomes that demonstrably exceed any existing obligations.

- 1.2.2 In line with government guidance relating to additionality published by DEFRA 'What can you count towards a development's biodiversity net gain' (Updated June 2026), habitat and species-specific mitigation measures can be included within BNG calculations. However, at least 10% of the total biodiversity units delivered by the Scheme should come from other habitat creation and enhancement measures not associated with any other specific mitigation/compensation. This ensures that biodiversity gains delivered beyond the point of no net loss (to achieve at least 10% net gain) are additional to existing obligations.
- 1.2.3 This additionality guidance in relation to mitigation, compensation and enhancement is summarised in Table 1 below.

Table 1: Mitigation, Compensation & Enhancement Measures in Relation to BNG Additionality

Category	Purpose	How can this count towards BNG?
Mitigation	Measures to avoid or reduce adverse effects identified within the assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 3) [REP4-010] . <i>For example, skylark mitigation habitat, hedgerow re-instatement to restore baseline conditions following temporary works.</i>	Partially (up to 100% of baseline units – to the point of 'no net loss')
Compensation	Measures to offset residual adverse effects where mitigation is not possible. <i>For example, hedgerow creation to compensate for permanent hedgerow losses elsewhere.</i>	Partially (up to 100% of baseline units – to the point of 'no net loss')
Enhancement	Any additional measures that improve biodiversity, beyond that required for mitigation or compensation.	In full (at least 10% of total units must come from this category)

2 Area-Based Habitat

- 2.1.1 The following quantifiable habitat or species-specific mitigation measures have been identified, associated with area-based habitats within the Order Limits:
- Ground-nesting bird mitigation habitat comprising set-aside and diverse wildflower meadow creation; and
 - Retention of habitat for rare arable plants (namely shepherd's needle *Scandix pecten-veneris*) comprising set-aside.
- 2.1.2 These measures are considered to provide direct mitigation, as defined in Section 1.3 above, for loss of habitat suitable to support ground-nesting birds and rare arable plants and are described in **ES Chapter 9 [REP4-010]**, and can therefore only be considered up to the point of no net loss within BNG calculations.
- 2.1.3 None of the proposed area-based habitat creation measures detailed within **7.8 Biodiversity Net Gain Assessment Report [REP4-045]** are required to compensate for an identified impact on any ecological features assessed within **ES Chapter 9 [REP4-010]**. All other area-based habitat creation and enhancement measures within the Scheme are considered to provide **enhancements** and can be used in full to demonstrate biodiversity gains.
- 2.1.4 Table 2 overleaf sets out the quantum of area-based habitats proposed to deliver the above specific mitigation measures, and the associated Habitat Units (HU) that are considered lost and proposed in BNG calculations.

Table 2: Area-Based Habitat Identified as Delivering Species-Specific Mitigation

Baseline Habitat Type & Condition	Area (ha)	Habitat Units Lost (HU)	Proposed Habitat Type & Condition	Proposed Habitat Units (HU)	Feature ID / Location
Ground-Nesting Bird Mitigation					
Cropland – Arable Field Margins Pollen and Nectar (Condition Assessment N/A)	0.9144	3.66	Cropland – Non-Cereal Crops (Condition Assessment N/A)	1.76	Field A11
Cropland – Cereal Crops (Condition Assessment N/A)	14.0530	28.11	Cropland – Non-Cereal Crops (Condition Assessment N/A)	27.12	Field A11
Cropland – Cereal Crops (Condition Assessment N/A)	4.1678	8.34	Grassland – Other Neutral Grassland (Good)	35.02	Field C1 (southern half)
Cropland – Cereal Crops (Condition Assessment N/A)	15.2478	30.50	Grassland – Other Neutral Grassland (Good)	128.13	Field C6
Cropland – Cereal Crops (Condition Assessment N/A)	17.6938	35.39	Grassland – Other Neutral Grassland (Good)	148.69	Field C32
Cropland – Non-Cereal Crops (Condition Assessment N/A)	7.6686	15.34	Cropland – Non-Cereal Crops (Condition Assessment N/A)	14.80	Field A12
Cropland – Non-Cereal Crops (Condition Assessment N/A)	22.8094	45.62	Cropland – Non-Cereal Crops (Condition Assessment N/A)	44.02	Field C10
Cropland – Temporary Grass and Clover Leys (Condition Assessment N/A)	3.9275	7.86	Grassland – Other Neutral Grassland (Good)	33.00	Field C1 (northern half)
Urban – Bare Ground (Poor)	0.1473	0.29	Cropland – Non-Cereal Crops (Condition Assessment N/A)	0.28	Field A11
Urban – Developed Land; Sealed Surface (N/A – Other)	0.0962	0.00	Cropland – Non-Cereal Crops (Condition Assessment N/A)	0.19	Field A11
Arable Weed Mitigation					

Baseline Habitat Type & Condition	Area (ha)	Habitat Units Lost (HU)	Proposed Habitat Type & Condition	Proposed Habitat Units (HU)	Feature ID / Location
Cropland – Cereal Crops (Condition Assessment N/A)	2.5682	5.14	Cropland – Non-Cereal Crops (Condition Assessment N/A)	5.14	Field B6 (northern margin)
Total	89.2940	180.25		438.15 (+257.90 HU gain)	

- 2.1.5 The total area identified as being used to deliver specific mitigation for ground-nesting birds and rare arable plants is 89.29ha. The baseline value of this area is calculated as 180.25HU, and proposed mitigation measures will result in a unit score of 438.15HU post-development.
- 2.1.6 Table 3 below demonstrates how the principle of additionality has been met, showing how the proposed HU associated with area-based mitigation measures are calculated relative to the total post-development HU for the Scheme.

Table 3: Proportion of HU Assigned to Specific Mitigation Measures and Additional Habitats

Total Baseline HU	3029.55 HU
Baseline + 10% (required HU to achieve 10% net gain for biodiversity)	3332.51 HU
Total Proposed HU	4141.80 HU
Proposed HU Required for Specific Mitigation	438.15 HU
Total Proposed HU – HU Required for Specific Mitigation	3703.65 HU
% of Total Proposed HU Comprising HU Required for Specific Mitigation	10.58%
% of Total Proposed HU Considered Additional	89.42%

- 2.1.7 As demonstrated above, significantly more than 10% of the proposed HU for the Scheme has been delivered through measures excluded from habitat and species-specific mitigation and is therefore in accordance with government guidelines regarding additionality.

3 Hedgerows

- 3.1.1 The following quantifiable mitigation and compensation measures have been identified, associated with hedgerow habitats within the Order Limits:
- Hedgerow **mitigation** via re-instatement of temporary hedgerow losses during the construction phase, including to facilitate cable installation and temporary accesses; and
 - **Compensation** for permanent hedgerow losses and **compensation** for residual unit shortfall resulting from re-instatement through new hedgerow planting elsewhere within the Order Limits.
- 3.1.2 Additional hedgerow creation and enhancement measures that are additional to those required for mitigation or compensation are categorised as **enhancements** and may therefore be counted in full when demonstrating biodiversity gains. This includes the majority of the new hedgerow and tree line planting proposed as part of the Scheme, together with enhancements to existing hedgerows, such as infilling existing gaps and improving hedgerow condition through the enhancement of ground flora within adjacent buffer zones managed for ecological benefit.
- 3.1.3 Table 4 overleaf sets out the quantum of hedgerow habitats proposed to deliver the above specific mitigation measures (namely re-instatement of temporary hedgerow loss), and the associated Hedgerow Units (HeU) that are considered lost and proposed in BNG calculations.
- 3.1.4 As detailed within **7.8 Biodiversity Net Gain Assessment Report [REP4-045]**, all temporary removal of hedgerows will be reinstated or replaced with equivalent planting to achieve the same habitat type and condition of that lost. However, it should be noted that the Statutory Metric applies risk multipliers to account for the technical complexity associated with planting or restoring specific hedgerow types, and the number of years it takes a newly planted or enhanced hedgerow to mature into its intended condition. This is reflected in Table 4 where an overall shortfall of HeU is calculated.
- 3.1.5 Table 5 sets out the quantum of hedgerow habitats requiring compensation, and the associated HeU that are considered lost. Compensation measures are consequently summarised in Paragraphs 3.1.7 to 3.1.9.
- 3.1.6 It should be noted that the exact locations of proposed hedgerow losses have not yet been determined, with locations to be confirmed following detailed design and micro-siting of the cable. Hedgerows have therefore been grouped by classification and condition in Tables 4 and 5.

Table 4: Hedgerow Habitat Identified as Delivering Mitigation for Temporary Hedgerow Losses

Baseline Hedgerow Type & Condition	Length of Hedgerow Lost (m)	Hedgerow Units Lost (HeU)	Proposed Hedgerow Type & Condition	Length of Hedgerow Replaced (m)	Proposed Hedgerow Units (HeU)
Line of Trees (Moderate)	10	0.04	Line of Trees (Moderate)	10	0.02
Line of Trees (Poor)	24	0.05	Line of Trees (Poor)	24	0.04
Native Hedgerow (Good)	136	0.82	Native Hedgerow (Good)	136	0.53
Native Hedgerow (Moderate)	150	0.60	Native Hedgerow (Moderate)	150	0.50
Native Hedgerow (Poor)	22	0.04	Native Hedgerow (Poor)	22	0.04
Native Hedgerow – Associated with Bank or Ditch (Good)	200	2.40	Native Hedgerow – Associated with Bank or Ditch (Good)	200	1.57
Native Hedgerow – Associated with Bank or Ditch (Moderate)	67	0.54	Native Hedgerow – Associated with Bank or Ditch (Moderate)	67	0.45
Native Hedgerow – Associated with Bank or Ditch (Poor)	12	0.05	Native Hedgerow – Associated with Bank or Ditch (Poor)	12	0.05
Native Hedgerow with Trees (Good)	24	0.29	Native Hedgerow with Trees (Good)	24	0.14
Native Hedgerow with Trees (Moderate)	16	0.13	Native Hedgerow with Trees (Moderate)	16	0.09
Native Hedgerow with Trees – Associated with Bank or Ditch (Good)	12	0.22	Native Hedgerow with Trees – Associated with Bank or Ditch (Good)	12	0.11

Baseline Hedgerow Type & Condition	Length of Hedgerow Lost (m)	Hedgerow Units Lost (HeU)	Proposed Hedgerow Type & Condition	Length of Hedgerow Replaced (m)	Proposed Hedgerow Units (HeU)
Native Hedgerow with Trees – Associated with Bank or Ditch (Moderate)	12	0.14	Native Hedgerow with Trees – Associated with Bank or Ditch (Moderate)	12	0.10
Species-Rich Native Hedgerow (Good)	58	0.70	Species-Rich Native Hedgerow (Good)	58	0.45
Species-Rich Native Hedgerow (Moderate)	51	0.41	Species-Rich Native Hedgerow (Moderate)	51	0.34
Species-Rich Native Hedgerow – Associated with Bank or Ditch (Good)	273	4.91	Species-Rich Native Hedgerow – Associated with Bank or Ditch (Good)	273	3.20
Species-Rich Native Hedgerow – Associated with Bank or Ditch (Moderate)	77	0.92	Species-Rich Native Hedgerow – Associated with Bank or Ditch (Moderate)	77	0.77
Species-Rich Native Hedgerow with Trees (Good)	36	0.65	Species-Rich Native Hedgerow with Trees (Good)	36	0.32
Species-Rich Native Hedgerow with Trees (Moderate)	36	0.43	Species-Rich Native Hedgerow with Trees (Moderate)	36	0.30
Species-Rich Native Hedgerow with Trees – Associated with Bank or Ditch (Good)	33	0.79	Species-Rich Native Hedgerow with Trees – Associated with Bank or Ditch (Good)	33	0.39
Species-Rich Native Hedgerow with Trees – Associated with Bank or Ditch (Moderate)	47	0.75	Species-Rich Native Hedgerow with Trees – Associated with Bank or Ditch (Moderate)	47	0.53

Baseline Hedgerow Type & Condition	Length of Hedgerow Lost (m)	Hedgerow Units Lost (HeU)	Proposed Hedgerow Type & Condition	Length of Hedgerow Replaced (m)	Proposed Hedgerow Units (HeU)
Total	1,296*	14.87		1,296	9.94 (-4.93 HeU loss)

*The total hedgerow length calculated in this table differs from the exact equivalent total length in the Statutory Biodiversity Metric as a result of minor automated rounding within the Metric.

Table 5: Hedgerow Habitat Identified as Requiring Compensation for Temporary & Permanent Hedgerow Losses

Baseline Hedgerow Type & Condition	Length of Hedgerow Lost (m)	Hedgerow Units Lost (HeU)
Temporary Hedgerow Losses Requiring Compensation		
Residual Unit Deficit Following Reinstatement of Temporary Hedgerow Losses		4.93
Permanent Hedgerows Losses (Cable Route Corridor)		
Native Hedgerow with Trees (Moderate)	9	0.07
Species-Rich Native Hedgerow (Good)	14	0.17
Species-Rich Native Hedgerow – Associated with Bank or Ditch (Good)	22	0.40
Species-Rich Native Hedgerow – Associated with Bank or Ditch (Moderate)	11	0.13
Permanent Hedgerows Losses (Solar PV Sites)		
Native Hedgerow (Good)	22	0.13
Native Hedgerow (Moderate)	13	0.05
Native Hedgerow – Associated with Bank or Ditch (Good)	28	0.34
Native Hedgerow – Associated with Bank or Ditch (Moderate)	6	0.05
Native Hedgerow with Trees (Good)	7	0.08
Native Hedgerow with Trees – Associated with Bank or Ditch (Good)	12	0.22
Native Hedgerow with Trees – Associated with Bank or Ditch (Moderate)	6	0.07
Species-Rich Native Hedgerow (Good)	85	1.02
Species-Rich Native Hedgerow (Moderate)	17	0.14
Species-Rich Native Hedgerow – Associated with Bank or Ditch (Good)	44	0.79
Species-Rich Native Hedgerow with Trees (Good)	52	0.94

Baseline Hedgerow Type & Condition	Length of Hedgerow Lost (m)	Hedgerow Units Lost (HeU)
Species-Rich Native Hedgerow with Trees (Moderate)	12	0.14
Species-Rich Native Hedgerow with Trees – Associated with Bank or Ditch (Good)	42	1.01
Total	402	10.68

- 3.1.7 Table 5 above demonstrates how 10.68 HeU are required to be delivered in order to compensate for the resulting permanent and temporary loss of sections of hedgerow. Compensation for temporary and permanent hedgerow losses within the Order Limits will be provided at the Solar PV Sites through extensive planting of new hedgerows and enhancement of retained hedgerows.
- 3.1.8 For the following hedgerow types, equivalent units will be provided as compensation through the creation of Species-Rich Native Hedgerows with Trees:
- Native Hedgerow;
 - Native Hedgerow with Trees;
 - Native Hedgerow – Associated with Bank or Ditch;
 - Native Hedgerow with Trees – Associated with Bank or Ditch;
 - Species-Rich Native Hedgerow;
 - Species-Rich Native Hedgerow with Trees; and
 - Species-Rich Native Hedgerow – Associated with Bank or Ditch.
- 3.1.9 However, in order to satisfy the trading rules by which 'Very High' distinctiveness habitats must be replaced on a like for like basis, compensation for Species-Rich Native Hedgerows with Trees – Associated with Bank or Ditch will be delivered through enhancement of retained hedgerows of this habitat type. The total quantum of units to be delivered in this manner comprises 1.63 HeU.
- 3.1.10 The total post-development HeU will be generated from a combination of retained hedgerows, enhancement of existing hedgerows, and the planting of new hedgerows across the Scheme, as set out in **7.8 Biodiversity Net Gain Assessment Report [REP4-045]**. A breakdown of the sources of generated HeU by hedgerow type, condition and retention category (i.e retained, enhanced and created) is provided in Table 6 below.

Table 6: Proposed Post-Development Hedgerow Units

Baseline Hedgerow Type & Condition	Length (km)	Baseline Hedgerow Units (HeU)	Proposed Habitat Type & Condition	Proposed Hedgerow Units (HeU)
Retained Hedgerows				
Ecologically valuable line of trees - Good	0.398	4.78	Ecologically valuable line of trees - Good	4.78
Ecologically valuable line of trees - Moderate	0.184	1.47	Ecologically valuable line of trees - Moderate	1.47
Ecologically valuable line of trees - Poor	0.114	0.46	Ecologically valuable line of trees - Poor	0.46
Line of trees - associated with bank or ditch - Good	0.32	1.92	Line of trees - associated with bank or ditch - Good	1.92
Line of trees - associated with bank or ditch – Moderate	0.591	2.36	Line of trees - associated with bank or ditch – Moderate	2.36
Line of trees - associated with bank or ditch - Poor	0.111	0.22	Line of trees - associated with bank or ditch - Poor	0.22
Line of trees – Moderate	1.022	4.09	Line of trees – Moderate	4.09
Line of trees - Poor	0.716	1.43	Line of trees - Poor	1.43
Native hedgerow - associated with bank or ditch - Good	5.519	66.23	Native hedgerow - associated with bank or ditch - Good	66.23
Native hedgerow - associated with bank or ditch - Moderate	3.134	25.07	Native hedgerow - associated with bank or ditch - Moderate	25.07
Native hedgerow - associated with bank or ditch - Poor	0.075	0.30	Native hedgerow - associated with bank or ditch - Poor	0.30

Baseline Hedgerow Type & Condition	Length (km)	Baseline Hedgerow Units (HeU)	Proposed Habitat Type & Condition	Proposed Hedgerow Units (HeU)
Native hedgerow with trees - associated with bank or ditch - Good	2.095	37.71	Native hedgerow with trees - associated with bank or ditch - Good	37.71
Native hedgerow with trees - associated with bank or ditch - Moderate	1.252	15.02	Native hedgerow with trees - associated with bank or ditch - Moderate	15.02
Native hedgerow with trees - associated with bank or ditch - Poor	0.291	1.75	Native hedgerow with trees - associated with bank or ditch - Poor	1.75
Native hedgerow with trees - Good	1.518	18.22	Native hedgerow with trees - Good	18.22
Native hedgerow with trees - Moderate	1.371	10.97	Native hedgerow with trees - Moderate	10.97
Native hedgerow - Good	5.344	32.06	Native hedgerow - Good	32.06
Native hedgerow - Moderate	2.734	10.94	Native hedgerow - Moderate	10.94
Native hedgerow - Poor	0.228	0.46	Native hedgerow - Poor	0.46
Species-rich native hedgerow - associated with bank or ditch - Good	14.708	264.74	Species-rich native hedgerow - associated with bank or ditch - Good	264.74
Species-rich native hedgerow - associated with bank or ditch - Moderate	2.823	33.88	Species-rich native hedgerow - associated with bank or ditch - Moderate	33.88
Species-rich native hedgerow with trees - associated with bank or ditch - Good	11.91	285.84	Species-rich native hedgerow with trees - associated with bank or ditch - Good	285.84
Species-rich native hedgerow with trees - associated with bank or ditch - Moderate	2.749	43.98	Species-rich native hedgerow with trees - associated with bank or ditch - Moderate	43.98
Species-rich native hedgerow with trees - Good	12.991	233.84	Species-rich native hedgerow with trees - Good	233.84

Baseline Hedgerow Type & Condition	Length (km)	Baseline Hedgerow Units (HeU)	Proposed Habitat Type & Condition	Proposed Hedgerow Units (HeU)
Species-rich native hedgerow with trees - Moderate	3.494	41.93	Species-rich native hedgerow with trees - Moderate	42.00
Species-rich native hedgerow with trees - Poor	0.225	1.35	Species-rich native hedgerow with trees - Poor	1.35
Species-rich native hedgerow - Good	24.885	298.62	Species-rich native hedgerow - Good	298.62
Species-rich native hedgerow - Moderate	3.931	31.45	Species-rich native hedgerow - Moderate	31.45
Species-rich native hedgerow - Poor	0.174	0.70	Species-rich native hedgerow - Poor	0.70
Enhanced Hedgerows				
Native hedgerow - associated with bank or ditch	0.564	4.51	Native hedgerow with trees - associated with bank or ditch	8.46
Native hedgerow with trees - associated with bank or ditch	0.023	0.28	Native hedgerow with trees - associated with bank or ditch	0.40
Native hedgerow	1.334	5.34	Native hedgerow with trees	12.81
Native hedgerow	0.195	0.39	Native hedgerow with trees	1.21
Species-rich native hedgerow - associated with bank or ditch	0.612	7.34	Species-rich native hedgerow with trees - associated with bank or ditch	12.49
Species-rich native hedgerow with trees - associated with bank or ditch	0.341	5.46	Species-rich native hedgerow with trees - associated with bank or ditch	7.82
Species-rich native hedgerow with trees	1.001	12.01	Species-rich native hedgerow with trees	17.22
Species-rich native hedgerow with trees	0.625	3.75	Species-rich native hedgerow with trees	6.78
Species-rich native hedgerow	2.754	22.03	Species-rich native hedgerow with trees	41.32

Baseline Hedgerow Type & Condition	Length (km)	Baseline Hedgerow Units (HeU)	Proposed Habitat Type & Condition	Proposed Hedgerow Units (HeU)
Created Hedgerows				
N/A	9.442	N/A	Line of trees - Moderate	18.72
N/A	0.024	N/A	Line of trees - Poor	0.04
N/A	0.2	N/A	Native hedgerow - associated with bank or ditch - Good	1.57
N/A	0.067	N/A	Native hedgerow - associated with bank or ditch - Moderate	0.45
N/A	0.012	N/A	Native hedgerow - associated with bank or ditch - Poor	0.05
N/A	0.012	N/A	Native hedgerow with trees - associated with bank or ditch - Good	0.11
N/A	0.012	N/A	Native hedgerow with trees - associated with bank or ditch - Moderate	0.10
N/A	0.012	N/A	Native hedgerow with trees - Good	0.07
N/A	0.037	N/A	Native hedgerow with trees - Moderate	0.21
N/A	0.11	N/A	Native hedgerow - Good	0.43
N/A	0.15	N/A	Native hedgerow - Moderate	0.50
N/A	0.022	N/A	Native hedgerow - Poor	0.04
N/A	0.256	N/A	Species-rich native hedgerow - associated with bank or ditch - Good	3.00
N/A	0.083	N/A	Species-rich native hedgerow - associated with bank or ditch - Moderate	0.83

Baseline Hedgerow Type & Condition	Length (km)	Baseline Hedgerow Units (HeU)	Proposed Habitat Type & Condition	Proposed Hedgerow Units (HeU)
N/A	0.069	N/A	Species-rich native hedgerow with trees - associated with bank or ditch - Good	0.81
N/A	0.059	N/A	Species-rich native hedgerow with trees - associated with bank or ditch - Moderate	0.66
N/A	15.784	N/A	Species-rich native hedgerow with trees - Good	142.87
N/A	0.036	N/A	Species-rich native hedgerow with trees - Moderate	0.30
N/A	0.062	N/A	Species-rich native hedgerow - Good	0.49
N/A	0.051	N/A	Species-rich native hedgerow - Moderate	0.34
Total	138.856	1554.03		1751.87 (+197.84 HeU gain)

- 3.1.11 Taking into account the breakdown of HeU set out in Table 5 and Table 6 above, Table 7 below demonstrates how the principle of additionality has been met, showing how the proposed HeU associated with mitigation and compensation measures are calculated relative to the total post-development HeU for the Scheme.

Table 7: Proportion of HeU Assigned to Specific Mitigation & Compensation Measures and Additional Hedgerow Habitats

Total Baseline HeU	1554.03 HeU
Baseline + 10% (required HeU to achieve 10% net gain for biodiversity)	1709.43 HeU
Total Proposed HeU	1751.87 HeU
Proposed HeU Required for Mitigation & Compensation	10.68 HeU (inc. 1.63 units Species-Rich Native Hedgerow with Trees – Associated with Bank or Ditch)
Total Proposed HeU – HeU Required for Mitigation & Compensation	1741.19 HeU
% of Total Proposed HeU Comprising HeU Required for Mitigation & Compensation	0.61%
% of Total Proposed HeU Considered Additional	99.39%

- 3.1.12 As demonstrated above, significantly more than 10% of the proposed HeU for the Scheme has been delivered through measures excluded from mitigation and compensation and is therefore in accordance with government guidelines regarding additionality.

3.2 Watercourses

3.2.1 The following quantifiable mitigation and compensation measures have been identified, associated with watercourses within the Order Limits:

- **Mitigation** to reinstate or restore sections of watercourse affected by temporary works has not been quantified. This is because the temporarily impacted sections are expected to be restored to their baseline condition within two years of the impact and are therefore considered to be 'retained' for BNG purposes
- **Compensation** for permanent watercourse losses, including to facilitate culvert creation and new watercourse crossings, through enhancement of retained watercourse sections.

3.2.2 The small quantum of proposed permanent watercourse losses (approximately 0.03km in total) associated with creation of new watercourse crossings equates to less than 0.01 Watercourse Unit (WU) loss. Within the Statutory Biodiversity Metric, no loss of WU is recorded owing to automated rounding within the Metric.

3.2.3 As detailed within **7.8 Biodiversity Net Gain Assessment Report [REP4-045]**, additional post-development watercourse units are proposed to be generated through the enhancement of existing watercourses (primarily by enhancing bankside habitats), rather than through the creation of new watercourses. All watercourse enhancement measures that are additional to those required to compensate for culvert creation are categorised as enhancements and may therefore be counted in full when demonstrating biodiversity gains.

3.2.4 The total post-development WU will be generated almost entirely from a combination of retained watercourses and enhancement of existing watercourses, as set out in **7.8 Biodiversity Net Gain Assessment Report [REP4-045]**. A breakdown of the sources of generated WU by watercourse type, condition and retention category (i.e retained, enhanced and created) is provided in Table 8 below.

3.2.5 The total baseline WU within the Order Limits is 111.01 WU, with 132.68 WU proposed post-development. With the exception of the small number of units (considered non-significant in the Metric) required to **compensate** loss of 0.03km of watercourse, all increase in watercourse units as a result of measures proposed can be considered additional **enhancement**.

Table 8: Proposed Post-Development Watercourse Units

Baseline Watercourse Type & Condition	Length (km)	Baseline Watercourse Units (WU)	Proposed Watercourse Type & Condition	Proposed Watercourse Units (WU)
Retained Watercourses				
Other rivers and streams - Moderate	0.538	5.33	Other rivers and streams - Moderate	5.33
Other rivers and streams – Fairly Poor	0.645	4.50	Other rivers and streams – Fairly Poor	4.50
Ditches - Moderate	1.251	8.13	Ditches - Moderate	8.13
Ditches - Poor	2.619	7.90	Ditches - Poor	7.90
Culvert - Poor	0.154	0.21	Culvert - Poor	0.21
Enhanced Watercourses (enhanced via improved watercourse / riparian encroachment values rather than change in watercourse type / condition)				
Priority Habitat river - Moderate	0.873	11.75	Priority Habitat river - Moderate	17.06
Priority Habitat river – Fairly Poor	0.616	5.78	Priority Habitat river – Fairly Poor	7.40
Other rivers and streams – Fairly Good	0.635	8.07	Other rivers and streams – Fairly Good	9.53
Other rivers and streams - Moderate	0.415	4.05	Other rivers and streams - Moderate	4.98
Other rivers and streams – Fairly Poor	1.293	9.19	Other rivers and streams – Fairly Poor	11.36
Ditches - Moderate	3.455	21.80	Ditches - Moderate	26.35
Ditches - Poor	7.991	24.30	Ditches - Poor	30.51
Created Watercourses				
N/A	0.03	N/A	Culvert - Poor	0.03
Total	20.5	111.01		132.68 (+197.84 HeU gain)