BSG | ecology

Lubrizol, Hazelwood

HV infrastructure upgrades - Biodiversity Gain Report

October 2026

BLANK PAGE

Issuing office

3 Brunel House | Hathersage Park | Station Approach | Hathersage | Derbyshire | S32 1DP
T: 01433 651869 | W: www.bsg-ecology.com | E: info@bsg-ecology.com

Client	Lubrizol
Project	Lubrizol, Hazelwood, HV infrastructure upgrades
Version	FINAL
Project number	P25-361

	Name	**Position**	**Date**
Originated	Emily McVean	Senior Ecologist	13 August 2026
Reviewed	Katy Siles	Principal Ecologist	17 August 2026
Approved for issue to client	Katy Siles	Principal Ecologist	17 August 2026
Issued to client	Emily McVean	Senior Ecologist	18 August 2026
Updated	Emily McVean	Senior Ecologist	02 October 2026
Reviewed	Kirsty Kirkham	Director	07 October 2026
Issued to client	Emily McVean	Senior Ecologist	07 October 2026

Disclaimer

This report is issued to the client for their sole use and for the intended purpose as stated in the agreement between the client and BSG Ecology under which this work was completed, or else as set out within this report. This report may not be relied upon by any other party without the express written agreement of BSG Ecology. The use of this report by unauthorised third parties is at their own risk and BSG Ecology accepts no duty of care to any such third party.

BSG Ecology has exercised due care in preparing this report. It has not, unless specifically stated, independently verified information provided by others. BSG Ecology is not responsible for any failure to deliver or implement any biodiversity measures set out in this report. No other warranty, express or implied, is made in relation to the content of this report and BSG Ecology assumes no liability for any loss resulting from errors, omissions or misrepresentation made by others.

Any recommendation, opinion or finding stated in this report is based on circumstances and facts as they existed at the time that BSG Ecology performed the work. The content of this report has been provided in accordance with the provisions of the CIEEM Code of Professional Conduct. BSG Ecology works where appropriate to the scope of our brief, to the principles and requirements of British Standard BS42020.

Nothing in this report constitutes legal opinion. If legal opinion is required the advice of a qualified legal professional should be secured. Observations relating to the state of built structures or trees have been made from an ecological point of view and, unless stated otherwise, do not constitute structural or arboricultural advice.

Contents

1 Introduction 2
2 Methodology 3
3 Results 5
4 References 9
5 Figures 10
6 Appendices 11
Appendix 1: Proposed Site Layout 12
Appendix 2: Habitat Condition Assessments 13
Appendix 3: Statutory Biodiversity Metric Calculator Tool 17
Appendix 4: Summaries of Relevant Policy, Legislation and Other Instruments 18

1 Introduction

1.1 This report has been prepared to inform the planning application made on behalf of Lubrizol to Amber Valley Council to upgrade high voltage (HV) cables. This assessment has been prepared following a planning application validation requirement from Amber Valley Council, stating that the application boundary must include the private roads and car park areas that will be unchanged as a result of the proposed development, but will be used to access the public highway. This addition has increased the size of the application area, such that the development is no longer considered to be eligible for exemption from the Biodiversity Gain statutory requirements.

1.2 This report provides the details of the biodiversity gain assessment undertaken for the development; consideration is given to relevant legislative, planning policy and guidance documents to inform the presentation of the assessment. It is considered that sufficient certainty is given in the assessment to inform local planning authority decision making, on the principle that the biodiversity gain condition can be met, should planning permission be granted.

1.3 The biodiversity gain measures proposed are considered to be proportionate, reasonable, locally relevant, and practical to deliver on- and/or off-site.

1.4 BSG Ecology has relied upon the following information in the preparation of this assessment:

- The planning application 'red line' boundary of the Site (drawing 5167-MDL-00-SI-D-A-0100_P06, prepared by Morrison design Ltd, dated 28 September 2026)
- The proposed development layout of the Site (drawing 250691-CPW-XX-XX-DR-E-211002 S2 P01.01, prepared by CPW, dated 10 June 2026) see Appendix 1.
- Habitat survey data, including Figure 1, arising from the survey work verified on 28 August 2026 to inform the pre-development baseline habitat values, the date of this survey is considered to be 'the relevant date'.
- Details of impacts to trees have been derived from Wharncliffe Woodland and Trees Consultancy (2026) Arboricultural Impact Assessment and Method Statement, August 2026.
- The published Statutory Biodiversity Metric and the associated User Guide applicable at the date of the biodiversity gain assessment, as referred to in the Methodology section of this report.
- Any other relevant information provided by the applicant or noted by BSG Ecology regarding activity on the Site where the development is to take place:
  - ❖ specifically for a Site which does not have planning permission, any activity unrelated to any planning permission on or after 30 January 2020.
  - ❖ specifically for a Site which already has planning permission, any activity in accordance with any planning permission on or after 25 August 2023.
- Any other information provided by the applicant to inform the preparation of the projected biodiversity value of any habitat on and/or offsite - such as information on work areas/impacts.
- Amber Valley Borough Council (2026) *Amber Valley Borough Local Plan 2022-2040*. Adopted 2 March 2026.
- Derbyshire County Council (2025). A Local Nature Recovery Strategy for Derbyshire: Statement of Biodiversity Priorities.
- BSG Ecology (2026) Ecological Appraisal Report. October 2026.

2 Methodology

2.1 The biodiversity gain assessment identifies a measure of biodiversity change using the Statutory Biodiversity Metric (the metric) (Defra, 2025) and the associated User Guide (Defra, 2026) and other relevant guidance, to calculate the biodiversity gain outcome of the development.

2.2 The metric is a tool used to measure biodiversity losses and gains in relation to habitats. The metric has been used to calculate the biodiversity value of the Site before the development and to provide a provisional value after the development. The purpose of the metric values after the development is to provide sufficient comfort and certainty to the local planning authority in their consideration of the development that biodiversity gain can be achieved in principle for this development i.e. the biodiversity gain condition can be met. The final metric outcome is subsequently calculated and included in the Biodiversity Gain Plan (BGP) which is to be submitted following planning consent to inform the discharge of the biodiversity gain condition.

2.3 The metric enables determination of whether the development is likely to result in losses or gains in biodiversity unit terms. The metric is used to numerically quantify the value of biodiversity at a site and can be used to inform an evidence base on the extent of required mitigation for a development, the extent of residual biodiversity impact and, if necessary, to identify the amount of required compensation. The Environment Act 2021 and associated secondary Regulations (SI2024 No's 44-50) together require biodiversity gain of 10% as a general condition of planning permission.

2.4 Reference is made to the following in this assessment:

- The Biodiversity Gain Requirements (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 (SI No. 50) and national planning policy guidance (PPG) Biodiversity net gain - GOV.UK (14 February 2024, last updated 01 May 2024).
- National planning policy guidance, as set out within the NPPF, in relation to securing measurable biodiversity gain through development proposals.
- Relevant local planning policy and supplementary planning guidance.
- The biodiversity net gain good practice principles (ciria, CIEEM, CIEMA, 2019) it is noted that a number of these principles have been superseded by the *Biodiversity net gain* PPG Biodiversity net gain - GOV.UK (14 February 2024, last updated 01 May 2024).

2.5 The interaction between the NPPF mitigation hierarchy and the biodiversity gain hierarchy is also considered.

2.6 The results of the metric are provided in the Statutory Biodiversity Metric (SBM) as an excel spreadsheet that accompanies this report. The results of the baseline habitat condition assessments are provided by sperate cover in the BSG Ecology (2026) Ecological Appraisal Report.

2.7 It is noted that Amber Valley Borough Council's local requirements for planning[1] do not require that post-development biodiversity gain calculations are submitted at applications stage. The applicant has however, provided preliminary post-development calculations within the SBM.

Consideration of assumptions and limitations

2.8 The habitat survey was completed in the month of June which is considered to be acceptable timing to inform habitat classification and condition assessment of habitats present on Site. The survey timing or methods are not considered to have been significantly constrained.

2.9 Details of habitat loss have been derived with discussion from a professional arboricultural consultant (Wharncliffe Woodland and Trees Consultancy) and electrical designers (CPW). It is assumed that, as a realistic worst case scenario, all of the parts of hedgerow H1, woodland W1 and woodland W3 that fall within the redline boundary will need to be felled/removed. This includes a corridor of ca. 2-4m width, and is considered to be the realistic scenario. All other impacts arising from trenching are

[1] https://www.ambervalley.gov.uk/planning/development-management/validation/

assessed to be temporary in the SBM because it is predicted that the habitats will be restored to their baseline condition within two years of the impact occurring, which means the habitats are treated as retained in the SBM.

3 Results

3.1 The metric and habitat condition assessment data using relevant UK Habitat classification criteria are provided. In the SBM that accompanies this report and in the BSG Ecology (2026) Ecological Appraisal Report.

3.2 The pre-application information requirements under the biodiversity gain insertions to Town and Country Planning Act 1990 are provided below. A Biodiversity Gain Plan and HMMP will be submitted to Amber Valley Borough Council prior to the commencement of works, following receipt of planning consent.

3.3 The majority of the Site is well-maintained hardstanding (developed land; sealed surface) such as paving, roads and car parking. Other habitats that intersect the route include grasslands, present in the form of verges, lawn, a silage/haylage crop, and grasscrete parking. Areas of woodland and hedgerow are also present within and intersect the cable route.

Ecological data

3.4 Ecological data that are within the public domain can be shared with Derbyshire Biological Records Centre.

The relevant date for the pre-development habitat assessment

3.5 It is considered that the baseline environment, as assessed within the SBM, has not significantly changed between the initial 16 June 2026 survey date and the application submission date due to the relatively short period of time that has elapsed, the visit completed on 28 August 2026, and there being no known change of management or land tenure during this period.

3.6 It is noted that that land within the Site has been subject to lawful habitat changes as part of planning applications (Amber Valley District Council references: AVA/2017/1399 and AVA/2017/1262). However, these works were complete before 25 Aug 2023[2], and therefore the anti-trash provision of paragraph 6A of Schedule 7A Town and Country Planning Act 1990 does not apply.

3.7 There is no evidence that any other activities, outside a planning consent, have been undertaken that have permanently changed the value of the Site since 30 Jan 2020, with reference to a review of Google Earth Pro (last accessed 26 July 2026).

3.8 Taking the above into account, the proposed 'relevant date' for this development is considered to be the verification survey date of **28 August 2026**.

Irreplaceable habitats

3.9 No irreplaceable habitat has been identified within the Site. No irreplaceable habitat is expected to be negatively affected by the development.

Strategic significance and Local Nature Recovery Strategies

3.10 Derbyshire has a Local Nature Recovery Strategy (Derbyshire County Council, 2025). The Site does not intersect any priority areas of measures for the strategy.

Application of the biodiversity gain hierarchy

3.11 The biodiversity gain hierarchy has been considered for this development, as follows.

[2] Refer to historical aerial imagery: ESRI World Imagery Wayback (2026) Maxar (WV03) image captured on 2023-06-13 as shown in the 2024-03-07 version of the World Imagery map. Available at: https://livingatlas.arcgis.com/wayback/#mapCenter=-1.52398%2C53.00616%2C18&mode=explore&active=60013 Accessed 27 July 2026.

1. Avoidance: There are no high or very high distinctiveness habitats on Site that needed to be avoided. The Site supports very low, low and medium distinctiveness habitats only. It has not been possible to avoid medium and low distinctiveness habitats.

2. Mitigation: The cable design was amended to minimise the loss of medium distinctives habitat (i.e. re-routed to avoid larger amounts of trees and woodland, and to target an existing gap in the understorey of the native hedgerow). Medium distinctiveness woodland and native hedgerow is anticipated to be lost. All other habitats are expected to be subject to temporary impacts only.

3. On-site habitat enhancement: It is not possible to enhance the urban habitats that make up the majority of the Site. At this stage it is not proposed to enhance habitats on site, as the Site is an operational area that may be subject to future changes and impacts based on the Sites close proximity to the existing infrastructure and buildings.

4. On-site habitat creation: Habitat creation onsite is not feasible due to the limited space within the Site that is appropriate for planting. For this reason, it has not been proposed that replacement tree planting is created above the proposed cable route, as trees may impede future maintenance access or cause damage to underground infrastructure in the future. It is anticipated that the canopies of the retained trees may grow over the corridor when given more space for secondary/lateral growth to provide cover; this has not been assumed as part of the biodiversity gain assessment.

5. Off-Site habitat creation/enhancement: Off-site habitat creation or enhancement will be undertaken as part of the planning application via the purchase of habitat and hedgerow partial units from a third party, see below.

6. Biodiversity units: Shortfalls in achieving biodiversity gain will be addressed via the purchase of biodiversity units from a registered habitat bank. The purchase of offsite units relating to low and medium distinctiveness habitats is required (refer to Appendix 3: Statutory Biodiversity Metric calculator tool headline results for the unit deficit).

7. Statutory biodiversity credits: Subject to an appropriate offsite vendor of biodiversity units being available, no statutory biodiversity credits are necessary for purchase.

Interaction between biodiversity gain hierarchy and NPPF mitigation hierarchy

3.12 At a national policy level the NPPF sets out that when determining planning applications for proposed development, a system of avoidance, mitigation then compensation should apply, as set out in Policy N2 (see appendix 4): "*If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused."* typically referred to as the mitigation hierarchy. Proposed developments that are within the scope of the statutory biodiversity gain framework are also subject to 'the biodiversity gain hierarchy' which must also be applied to development applications.

3.13 The biodiversity gain hierarchy has a sequential application as set out in the *Biodiversity net gain* Planning Practice Guidance (PPG) (GOV.UK, May 2024). In summary the biodiversity gain hierarchy requires, for habitats scoring 4 or more for distinctiveness, demonstration of how and why adverse onsite effects are or cannot be avoided or mitigated for and/or how losses are compensated for onsite, then offsite using units or through the purchase of biodiversity credits.

3.14 The biodiversity gain and NPPF mitigation hierarchies have been considered together from the design stage onwards. Consultation and liaison has been undertaken during the pre-application stage between the applicant and the technical disciplines involved in the planning application preparation in relation to the biodiversity gain strategy/approach for the development.

3.15 The BSG Ecology (2026) Ecological Appraisal report identifies and assesses the risk of potential significant ecological impacts and sets out avoidance, mitigation and compensation measures in line with the NPPF mitigation hierarchy. In summary, in relation to the loss of habitats or impacts to protected species, no specific onsite compensation measures were identified as being required (with

reference to CIEEM (2018) guidance). Hence no further consideration is required in relation to additionality in the biodiversity gain assessment.

Significant on-site enhancements

3.16 Significant onsite enhancements are habitats created or enhanced to a distinctiveness score of four or more, according to the *Biodiversity net gain* Planning Practice Guidance (PPG) (GOV.UK, May 2024). Additionally, low distinctiveness that create a large number of biodiversity units relative to the predevelopment biodiversity value of the Site may also be considered significant.

3.17 It is considered that no significant enhancements are proposed on-site.

Trading rules

3.18 Habitat units: Trading rules within the metric are not satisfied via the provision of onsite habitat units; there is a deficit in habitat units of medium distinctiveness or higher. Trading rules will be satisfied and delivered via the provision of the offsite habitat creation/enhancements via the purchase of habitat units from a habitat bank.

3.19 Hedgerow units: Trading rules within the metric will be satisfied and delivered via the provision of the offsite habitat creation via the purchase of units from a habitat bank. It may be possible that low distinctiveness hedgerow habitat can be created on-site to meet trading rules – this will be confirmed within the Biodiversity Gain Plan.

Habitat management and monitoring plan

3.20 No habitat provision is being made on Site and therefore a HMMP will not be required.

The anticipated change in biodiversity value results using the Defra Statutory Biodiversity Metric

3.21 The proposed habitat outcomes are considered to be achievable, can be legally secured and they are appropriate to the location and setting of the Site and the locally surrounding habitats.

3.22 The onsite habitat changes include the removal of woodland and ornamental hedgerows, and the creation of modified grassland in its place. Urban habitats of no biodiversity value (‘developed land; sealed surface’ and ‘artificial unvegetated; unsealed surface’) will also be created. The final change in biodiversity units resulting from this development, which will involve the purchase of habitat units, will be confirmed in the BGP.

Table 1: Habitat Creation/enhancement: Proposed onsite biodiversity gain habitat types, distinctiveness and condition

Proposed habitat type	Distinctiveness	Target condition	Rationale
Onsite			
CREATION Developed land; sealed surface	Very Low	N/A	This habitat is required for the substation has a default condition score.
CREATION Artificial unvegetated, unsealed surface	Very Low	N/A	This habitat is required for the substation (hoggin path around the building) has a default condition score.
CREATION Modified grassland	Low	Poor	It is anticipated that the areas that are cleared of woodland to enable trenching will become grassland. Poor condition has been precautionarily anticipated as the adjacent retained woodland may negatively influence the narrow corridors of grassland (such as from shading, and self-sown scrub).
Offsite provisions to be sought			
Hedgerow Units	Medium or higher	Any	The additional hedgerow units that are required to achieve a 10% gain, and which will be sought from a habitat bank, may be from the creation or enhancement of hedgerows of medium distinctiveness or higher, and any condition.
Habitat Units	Medium distinctiveness woodland and forest broad habitat category OR any habitats of at least 'high' distinctiveness	Any	The additional habitat units that are required to meet metric trading rules and achieve a 10% gain, and which will be sought from a habitat bank, may be from medium distinctiveness woodland and forest habitat types, or from the creation or enhancement of any habitat that has a distinctiveness score of 6 or more in any condition.

3.23 The area measurements of habitats to be created and enhanced are provided in the SBM (Appendix 3).

4 References

Amber Valley Borough Council (2026) *Amber Valley Borough Local Plan 2022-2040*. Adopted 2 March 2026.

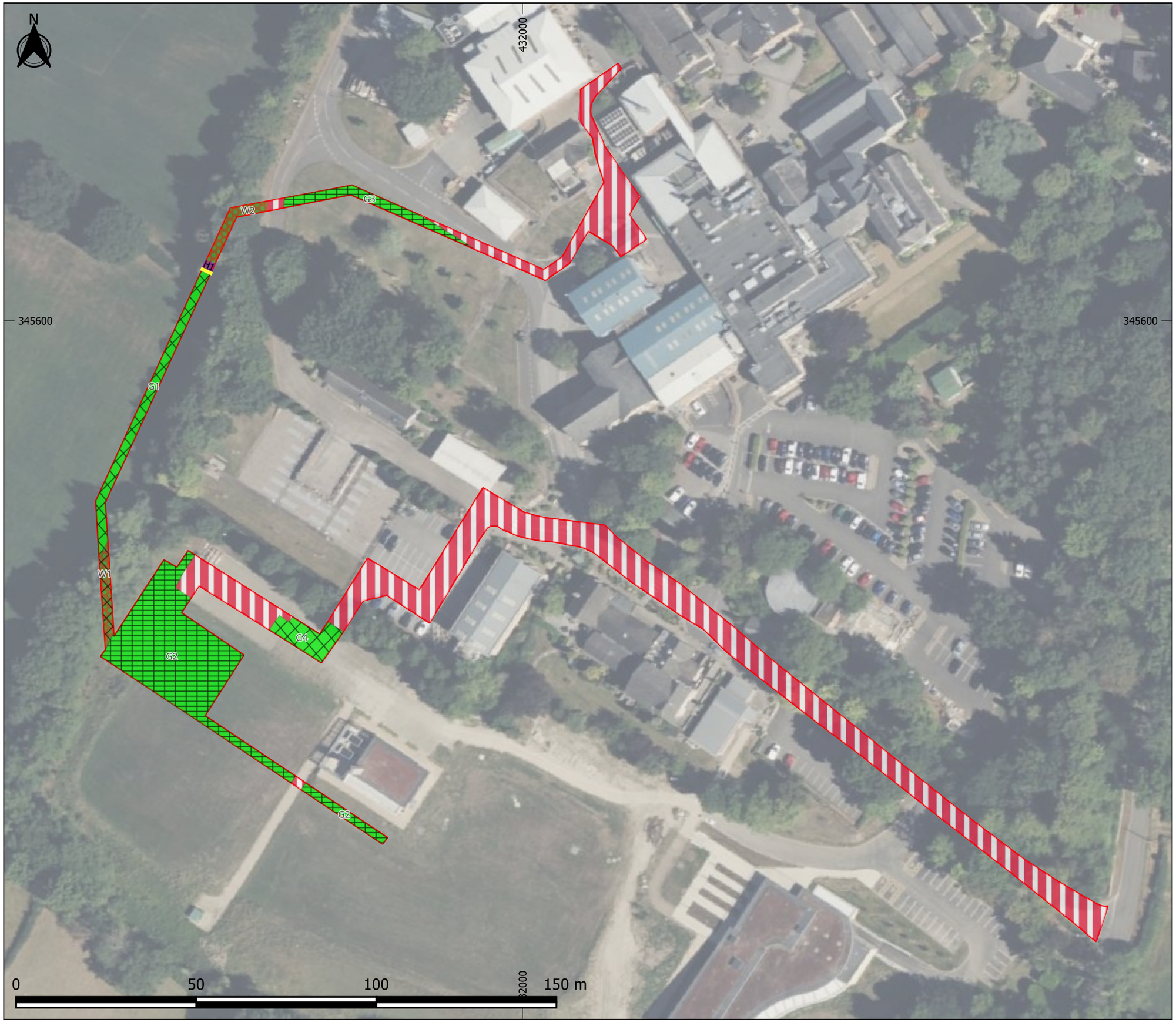
BSG Ecology (2026) *Lubrizol HV Upgrades Ecological Appraisal Report*. October 2026.

Defra (2025) *Statutory Biodiversity Metric, Technical Annex 1- Condition Assessment Sheets and Methodology*. Natural England. Version Number: July 2025 v1.0.2.

Defra (2026) *Statutory Biodiversity Metric: User Guide*. Natural England. Last updated June 2026.

Wharncliffe Woodland and Trees Consultancy (2026) Arboricultural Impact Assessment and Method Statement, August 2026

5 Figures



Legend

- Site boundary
- Native Hedgerow (h2NE5)
- Developed land; sealed surface
- Modified grassland
- Other woodland; mixed

Habitats Surveyed Condition

- Good
- Poor

Where no habitat condition is indicated, the condition assessment is not applicable.

BSG

OFFICE: DERBYSHIRE
T: 01433 651869

JOB REF: P25-361

PROJECT TITLE

LUBRIZOL HV INFRASTRUCTURE UPGRADES

DRAWING TITLE

Figure 1: Baseline Habitats

DATE: 02/10/2026 CHECKED: KS SCALE: 1:1,000

DRAWN: EM APPROVED: KS VERSION:1.1

Copyright © BSG Ecology

No dimensions are to be scaled from this drawing and are to be checked on site. Area measurements for indicative purposes only.

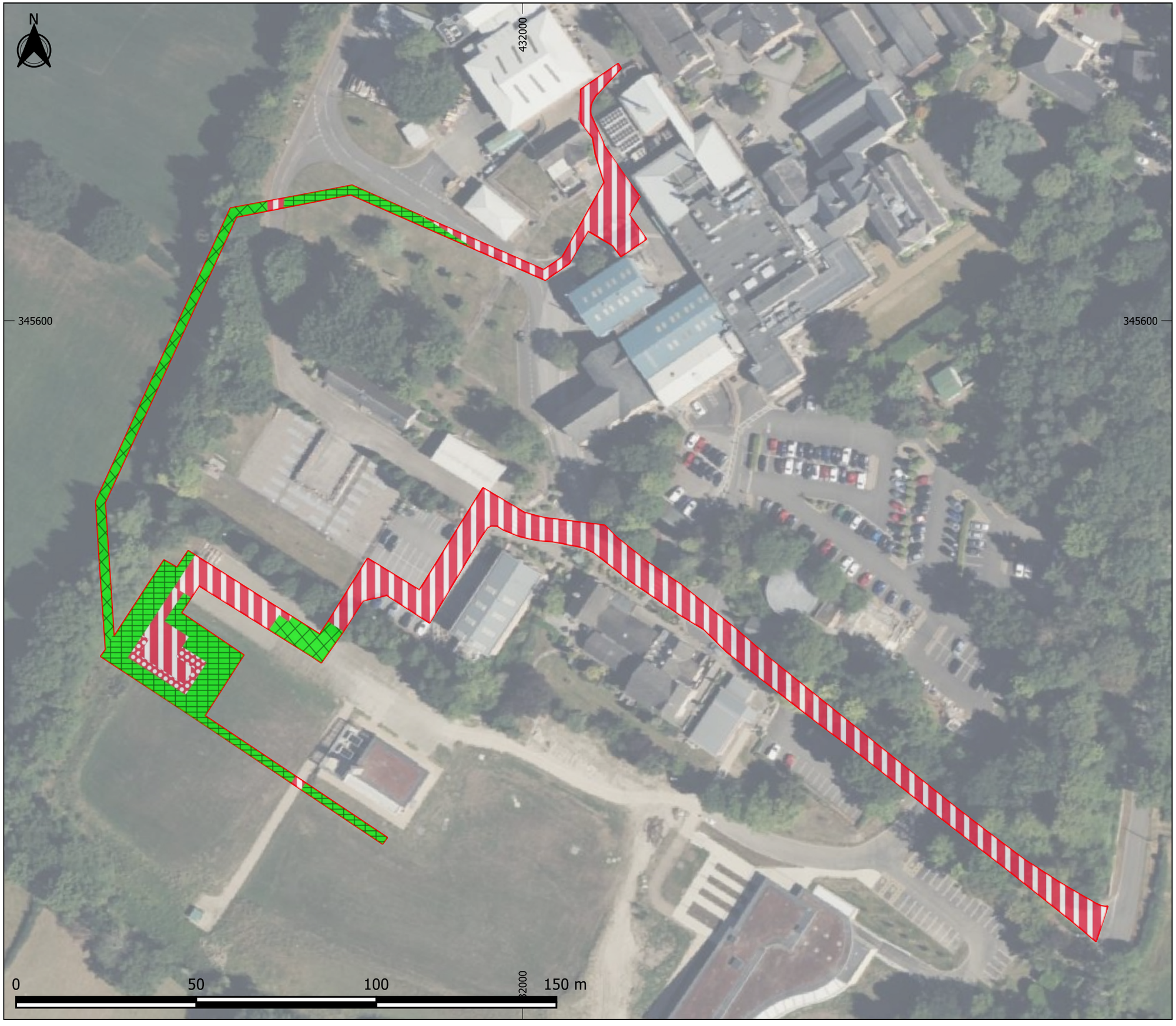
This drawing may contain: Ordnance Survey material by permission of Ordnance Survey on behalf of the Controller of His Majesty's Stationery Office © Crown Copyright 2026. All rights reserved. Reference number: AC0000818663

Aerial Photography © Bing. Microsoft Bing Maps screen shot reprinted with permission from Microsoft Corporation.

Projection: OSGB 1936/British National Grid - EPSG 27700

Sources: BSG Ecology survey data

Graphics Ref. No.: 15369



Legend

- Site boundary
- Artificial unvegetated, unsealed surface
- Developed land; sealed surface
- Modified grassland

Habitat Condition

- Good
- Poor

Where no habitat condition is indicated, the condition assessment is not applicable.

BSG

OFFICE: DERBYSHIRE
T: 01433 651869

JOB REF: P25-361

PROJECT TITLE

LUBRIZOL HV INFRASTRUCTURE UPGRADES

DRAWING TITLE

Figure 2: Post-development Habitats

DATE: 02/10/2026 CHECKED: KS SCALE: 1:1,000

DRAWN: EM APPROVED: KS VERSION:1.1

Copyright © BSG Ecology

No dimensions are to be scaled from this drawing and are to be checked on site. Area measurements for indicative purposes only.

This drawing may contain: Ordnance Survey material by permission of Ordnance Survey on behalf of the Controller of His Majesty's Stationery Office © Crown Copyright 2026. All rights reserved. Reference number: AC0000818663

Aerial Photography © Bing. Microsoft Bing Maps screen shot reprinted with permission from Microsoft Corporation.

Projection: OSGB 1936/British National Grid - EPSG 27700

Sources: BSG Ecology survey data

Graphics Ref. No.: 15369

6 Appendices

Appendix 1: Proposed Site Layout

(overleaf)

© 2026 COUCH PERRY WILKES
All scaled dimensions taken from this drawing are to be verified on site

NOTES

1. THE SITE LAYOUT AND SUBSTATION LOCATIONS ARE INDICATIVE AND BASED ON RECORD INFORMATION RECEIVED FROM THE CLIENT AND FROM DNO ASSET MAPS.
2. ALL PROPOSED DIVERSIONS AND NEW CONNECTIONS TO BE FULLY COORDINATED WITH OTHER EXISTING UTILITY SERVICES.
3. THIS IS NOT AN INSTALLATION DRAWING.
4. THIS DRAWING IS AN INDICATIVE LAYOUT ONLY, DEMONSTRATING THE CONCEPTUAL REQUIREMENTS CORRELATING WITH THE AGREED SCHEMATIC SOLUTIONS. THE PURPOSE OF THIS DRAWING IS TO DEMONSTRATE DESIGN INTENT, FOR FURTHER DEVELOPMENT BY THE RELEVANT SERVICES DESIGNER ONLY.
5. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE ELECTRICAL PERFORMANCE SPECIFICATION & ALL RELEVANT ARCHITECTURAL & ENGINEERING DRAWINGS, DETAILED & FULLY COORDINATED INSTALLATION DRAWINGS SHALL BE PROVIDED BY THE ELECTRICAL CONTRACTOR IN ACCORDANCE WITH THE SPECIFICATION.
6. THIS DRAWING IS FOR INFORMATION ONLY. THIS INFORMATION MUST NOT BE RELIED UPON IN THE EVENT OF EXCAVATION OR OTHER WORKS CARRIED OUT IN THE VICINITY OF ELECTRICAL PLANT. NO LIABILITY OF ANY KIND, WHATSOEVER, IS ACCEPTED BY CPW LLP FOR ERROR OR OMISSION IN RESPECT OF INFORMATION CONTAINED ON THIS DRAWING.
7. THE ACTUAL POSITION OF THE UNDERGROUND SERVICES SHALL BE VERIFIED AND ESTABLISHED ON SITE BEFORE ANY INTRUSIVE WORKS BEGIN. WHERE UNDERGROUND SERVICES EXIST WITH AN EMPHASIS ON FUEL PIPES, A VACUUM EXCAVATION IS TO BE APPLIED.
8. THE EXISTING PRIVATE HV CABLE ROUTE WAS ADVISED BY THE CLIENT. ALTHOUGH IT DOES NOT INDICATE THE LOCATION OF THE EXISTING T-JOINT OUTSIDE E-SUB, THEREFORE, AN UNDERGROUND SCANNING SERVICE NEEDS TO BE PERFORMED TO CONFIRM THE PRESENTED CABLE ROUTE.
9. ANY WORKS NEAR ELECTRICAL PLANT SHOULD BE UNDERTAKEN IN ACCORDANCE WITH THE HEALTH AND SAFETY EXECUTIVE GUIDANCE HSG46 - AVOIDING DANGER FROM UNDERGROUND SERVICES.
10. CABLE CHAMBERS ARE TO BE SIZED AGAINST THE MINIMUM BENDING RADIUS OF THE CABLES.
11. USE OF EXISITNG DUCTS SHALL ONLY BE ALLOWED WHEN COMPLYING TO STREET WORK UK STANDARDS AND SUBJECTED TO SUITABLE CONDITION FOLLOWING CAMERA SURVEY AND APPROVAL.
12. CONTRACTOR TO ASSESS WHETHER THE EXISTING DUCTS AND HV CABLE CHAMBERS CAN SUPPORT THE HV CABLE'S BENDING RADIUS.
13. WHERE CABLES ARE CROSSING, A MINIMUM VERTICAL DISTANCE OF 300mm IS REQUIRED.
14. CABLE JOINTS SHALL BE PROVIDED WITH A JOINT INSPECTION CHAMBER.

HEALTH AND SAFETY INFORMATION

Standards hazards and risks may not necessarily be identified on this drawing. The caution symbols that are identified, but not limited to, related to specific hazards and risks associated with this type of project.

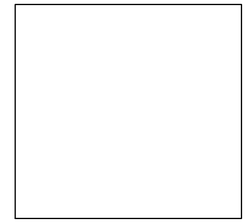
Reference should be made to the DRA for further details.

DRA Ref No.	Description
DRA01/01	EXCAVATIONS FOR INSTALLATION OF NEW UNDERGROUND 11KV AND LV CABLING. ACCIDENTAL CONTACT WITH EXISTING UNDERGROUND SERVICES SUCH AS FUEL PIPES, WATER, ELECTRIC AND MORE. RISK TO OPERATIVES AND RISK OF POLLUTION.
DRA01/04	REMOVAL OF EXISTING HV SWITCHGEAR/RMU IN EXISTING SUBSTATIONS. LOCATION OF PLANT REGARDING ACCESS FOR REMOVAL OF THE EQUIPMENT. HEAVY AND AWKWARDLY SIZED/SHAPED.
DRA01/06	SITE TEMPORARY POWER SUPPLIES. IDENTIFY THE NEED FOR EQUIPMENT TO COMPLETE THE TASKS. RISK OF DAMAGE TO TRAILING CABLES. RISK OF ELECTRIC SHOCK TO OPERATIVES.
DRA01/07	EXCAVATION OF FOUNDATIONS FOR NEW/EXISTING SUBSTATIONS. ACCIDENTAL CONTACT WITH EXISTING UNDERGROUND SERVICES. RISK TO OPERATIVES.
DRA01/11	JOINTING (DEAD) CABLES. ELECTRIC SHOCK RISK. WORK ON SITE IS TO BE UNDERTAKEN BY SUITABLY COMPETENT AND EXPERIENCED JOINTERS, FAMILIAR WITH AND COMPETANT FOR THE CABLES BEING WORKED UPON, FOLLOWING APPROVED SAFETY PROCEDURES AND DOCUMENTATION, ISSUED VIA A SUITABLY AUTHORISED PERSON.
DRA01/15	SUBSTATION EARTHING INSTALLATIONS. ACCIDENTAL CONTACT WITH EXISTING UNDERGROUND SERVICES. CONTROL OF NEW CABLE LOCATIONS. RISK TO OPERATIVES; ELECTROCUTION. REQUIREMENT FOR HANDTOOLS, OPEN FLAME/FIRE RISK DURING JOINTING
DRA01/16	INSTALLATION OF NEW 11KV SWITCHGEAR/RMU IN EXISTING SUBSTATIONS. CONSIDER THE LOCATION OF PLANT AND ACCESS FOR INSTALLATION OF THE EQUIPMENT. MANUAL HANDLING CAN BE A HAZARD IN CONSTRUCTION, INSTALATION & MAINTENANCE. RISK OF DAMAGING THE EXISTING INFRASTRUCTURE IN THE SUBSTATION.
DRA01/18	THE SWITCHGEAR INCORPORATES SF6 GAS AS A INSULATION ARC EXTINCTION MEDIUM, OCCASIONALLY THIS GAS CAN LEAK THROUGH DEFECTIVE / WORN SEALS.
DRA01/19	ACTIVITIES WITHIN THE SUBSTATION AT HIGH LEVEL. INJURY DUE TO INAPPROPRIATE ACCESS EQUIPMENT. FALLING FROM HEIGHT, UNEVEN SURFACES, OVER REACHING, OVERLOADING THE PLATFORMS, OBSTRUCTING ACCESS WAYS.
DRA01/21	LIVE FUNCTIONAL & DIAGNOSTIC TESTING. CONTACT WITH LIVE TERMINALS, FLASHOVERS. MANUAL HANDLING TO BE CONSIDERED WHEN DOORS AND COVERS ARE REMOVED. ELECTRIC SHOCK RISK. AWARNESS OF EXPOSURE TO ELECTRICITY; ARCING, FIRE, AND EXPLOSION RISK.
DRA01/23	HV CABLE PRESSURE TESTING. OVER EXERTION DURING INJECTION TESTING/SOAK TESTS. CONTACT WITH LIVE TERMINALS.
DRA01/26	TRENCH / COMPOUND / FUEL LINES / TANK FARMS. HIGHLIGHT PROXIMTY DIGGING CLOSE TO HIGH RISK AREAS. BELOW GROUND SERVICES, ESPECIALLY AROUND E-SUB & D-SUB. EXTREME CARE TO BE GIVEN WHEN DIGGING FOR EXISTING CABLES OR NEW TRENCHES.
DRA01/27	IDENTIFY THE EXISTING DNO CABLE TO THE NORTH OF THE SITE. ALSO PEIMETER FENCING. DNO CABLES AND PERIMETER FENCE SECRITY ARE KNOWN TO BE IN CLOSE PROXIMITY TO THE AREA OF THE PROPOSED G-SUB
DRA01/28	MAINTAIN ACCESS AT ALL TIMES. BLUE LIGHT VEHICLES ALTERNATIVE ROUTES MAY BE POSSIBLE.
DRA01/31	WORKING IN A LIVE HV SUBSTATION. RISK OF DAMAGING EXISTING SWITCHGEAR OR CABLES. RISK OF ELECTRIC SHOCK OR LOSS OF POWER TO THE SITE.
DRA01/32	IDENTIFICATION AND ISOLATION OF EXISTING SERVICES (CABLES). RISK OF ELECTRIC SHOCK. RISK OF WORKING ON THE WRONG CABLE AND DAMAGING EXISTING SERVICES.









LUBRIZOL
HV DNO SUBSTATION (12D4001)
AND CLIENT METERING ROOM TO BE
ABANDONED.

NGED UNDERGROUND HV CABLE
95mm² Al PIAS
STATUS: LIVE
CIRCUIT: BELPER

THE KNOWLE LODGE DNO's POLE
MOUNTED TRANSFORMER

NGED UNDERGROUND HV CABLE
ASSUMED ROUTE
95mm² Al PIAS
STATUS: LIVE
CIRCUIT: BELPER

PRIVATE UNDERGROUND HV CABLE
ASSUMED ROUTE
SIZE UNKNOWN
STATUS: TO BE ABANDONED

E-SUB
PRIVATE

D-SUB
PRIVATE

THE KNOWLE LODGE
CLIENT INDEPENDENT LV SUPPLY

TEST CELL 12.
SUPPLIED BY
D-SUB

D-SUB EXISTING
TRANSFORMER
TO BE REPLACED WITH
A NEW ONE

EXISTING BREAKERS
TO BE REPLACED WITH
NEW RMUs

PROPOSED DNO AND CLIENT
INTAKE SUBSTATION

DRA01/01&26

EXISTING FUEL PIPE, TO BE
RELOCATED OR
SUBSTATION TO BE BUILT
10m AWAY FROM THE PIPE

NGED UNDERGROUND HV CABLE
95mm² Al PIAS
STATUS: LIVE
CLIENT: GROVE FARM
HAZELWOOD HV FEEDER

NGED UNDERGROUND HV CABLE
95mm² Al PIAS
STATUS: NOT CONNECTED

NGED UNDERGROUND HV CABLE
3 x 1c 185mm² TRIPLEX Al EPR
STATUS: LIVE
CIRCUIT: BELPER

CLIENT'S UNDERGROUND HV CABLE TO BE
ABANDONED

ENERGY CENTRE LUBRIZOL
DNO HV SUBSTATION (898783)
TO BE ABANDONED

LV AND HV CABLE TO
BE DECOMMISSIONED
AFTER NGED'S WORK.

NGED'S POLE
No. 89DCJ57

NGED UNDERGROUND HV CABLE
3 x 1c 185mm² TRIPLEX Al EPR
TO BE DECOMMISSIONED BY NGED

PROPOSED NGED OVERHEAD LINE
3w 100 ACSR
STATUS: LIVE
CIRCUIT: BELPER

F-SUB (EXISTING) PRIVATE

*TABLE WITH EXISTING TRENCHES AND DUCTS INFORMATION
DETAILED IN EXISTING SITE LAYOUT DRAWING
REF - 221055-CPW-XX-XX-DR-E-211001

**PROPOSED SITE WIDE TRENCH PROFILE WITH THE RELEVANT
SECTION VIEWS DETAILED IN:
REF - 221055-CPW-XX-XX-DR-E-211004

KEY TO BUILDINGS

H1: VISITORS RECEPTION INCLUDING SECURITY
H2: DEVELOPMENT SUITE
H3: RESTAURANT AND CONFERENCE CENTER
H4: VEHICLE TEST FACILITY
H5: TANK FARM DISTRIBUTION CENTRE
H6: MECHANICAL TEST SCORE AND OFFICES
H7: MECHANICAL TEST WORKSHOPS AND RATINGS
H8: ENGINE BUILD AND CLEAN
H9: CONTROL WORKSHOPS
H10: INFORMATION SYSTEMS
H11: TEST CELLS
H12: KNOWLE HOUSE
H13: ENGINE OILS
H14: ENGINE CENTRE NO 1
H15: FLAMMABLE STORE NO.1
H16: FLAMMABLE STORE NO.2
H17: BLEND TEST WARE HOUSE
H18: BTS/ APPLIED SCIENCE LABS
H19: APPLIED SCIENCE LABS
H20: CHEMICAL SYNTHESIS
H21: VIDEO CONFERENCING
H22: VISUAL COMMUNICATIONS
H23: ENGINE OILS (CONT)
H24: DRIVELINE / SPECIALITIES
H25: FACILITIES WORKSHOP
H26: FACILITIES MANAGEMENT
H27: CONFERENCING CENTRE
H28: ENERGY CENTRE NO. 2

CANOPIES, TEMPORARY AND OTHER STRUCTURES

TS30U - OTTER 2 POWER UNIT
C1 - BIKE SHED
C2 - MOTORCYCLE SHED
C3 - FUEL DISTRIBUTION
U1 - SUBSTATION (D SUB)
U2 - SUBSTATION ENERGY CENTER
U3 - UPS PLANT HOUSING
U4 - WESTERN POWER SUBSTATION
U5 - TANK VALVE HOUSE
U6 - FACILITIES SHED
U7 - FACILITIES SHED
U8 - POLLUTION MONITORING STATION
U9 - NALFLOCK STORE
U10 - RECYCLING STORE
U11 - TYCO FOAM PUMP HOUSE
U12 - TLA UNIT
U13 - FIRST RESPONSE UNIT
U14 - JOINERS UNIT
U15 - ELECTRICIANS UNIT
U16 - MECHANICS UNIT
U17 - WELDING UNIT
W1 - WASTE COMPOUND
D1-4 - DENIOS CABINETS
SS - SMOKING SHELTER

KEY.

- SUPPLY FROM D SUB (EXISTING)
- SUPPLY FROM E SUB (EXISTING)
- SUPPLY FROM F SUB (EXISTING)
- SUPPLY FROM G SUB (NEW) (CURRENTLY SUPPLIED FROM D)

LEGEND

- DNO SUBSTATION
- PROPOSED CLIENT'S SUBSTATION
- EXISTING CLIENT'S SUBSTATION
- HV — DNO UNDERGROUND EXISTING 11kV CABLING
- HV(OHL) — DNO OVERHEAD EXISTING 11kV CABLING
- HV — DNO UNDERGROUND PROPOSED 11kV CABLING
- LV — DNO UNDERGROUND LV CABLING
- LV(OHL) — DNO OVERHEAD LV CABLING
- HV — HV CABLE NOT CONNECTED (TO BE VERIFIED)
- HV — CLIENT'S PROPOSED HV CABLE - INCOMER FROM DNO
- LV — CLIENT'S PROPOSED LV CABLE/S (LAY IN A DUCT)
- D(LV) — CLIENT'S PROPOSED LV SPARE DUCT
- HV(UNK) — UNKNOWN HV CABLE
- HV — CLIENT'S EXISTING HV CABLE (TO BE DECOMMISSIONED)
- HV — CLIENT'S PROPOSED HV CABLE (NEW RING MAIN)
- COM — CLIENT'S PROPOSED COMMUNICATION CABLE/S (LAY IN A DUCT)
- D(COM) — CLIENT'S PROPOSED COMMUNICATION SPARE DUCTS
- FUEL — ASSUMED FUEL PIPE ROUTE (TBC)
- WATER — EXISTING WATER ROUTE (TBC)
- FIRE — EXISTING FIRE HYD ROUTE (TBC)
- TRENCH SECTION VIEW**
- HYDRANT MARKER (REFER TO LZ-12-06-(R6)-FIRE STRATEGY)
- REVISION CLOUD

REV	DATE	DESCRIPTION	BY	VE
P01.01	10/06/2026	INITIAL ISSUE	AL	EW

www.cpwp.com
Address
Interface 100
Arleston Way, Solihull
B90 4LH
Phone
+ 44(0) 121 709 6600
Email
birmingham@cpwp.com

RIBA Stage
STAGE 2

Status
PRELIMINARY

Client
LUBRIZOL LTD.

Project
HZ-001493 - ELECTRICAL COMPLIANCE AND RELIABILITY

Drawing Title
PROPOSED HV AND LV INFRASTRUCTURE LAYOUT
PROPOSED SITE PLAN

Scale (A1)	Date	By	Ve
1:1000	10/06/2026	AL	NM

Proj ID	Originator	Volume	Level	Type	Role	Number	Suitability	Revision
250691	CPW	XX	XX	DR	E	211002	S2	P01.01

250691-CPW-XX-XX-DR-E-211002 S2 P01

CPW Project No. 250691

Linked Files

Appendix 2: Habitat Condition Assessments

Grassland condition assessments

Condition criteria:

A: There are 6-8 vascular plant species per m^2 present, including at least 2 forbs. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m^2 (excluding those indicative of suboptimal condition), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. **This condition is essential for reaching moderate condition.**

B: Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.

C: Some scattered scrub (including bramble *Rubus fruticosus* agg.) may be present, but scrub accounts for less than 20% of total grassland area. (Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.

D: Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.

E: Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).

F: Cover of bracken Pteridium aquilinum is less than 20%.

G: There is an absence of invasive non-native plant species.

Table1: Grassland condition assessment results

Ref	Habitat	Condition	A	B	C	D	E	F	G	Comments
G1	Modified grassland	**Poor**	Fail	Fail	Pass	Pass	Pass	Pass	Pass	Agricultural land used for a silage/haylage crop.
G2	Modified grassland	**Good**	Pass	Pass	Pass	Pass	Fail	Pass	Pass	Partly mown for amenity use (lawn and paths). Appears to be on 'made ground' based on even slope.
G3	Modified grassland	**Good**	Pass	Pass	Pass	Pass	Fail	Pass	Pass	Five newly planted willow trees present on grass verge - not mapped as trees as <6 cm DBH. Not within site.
G4	Modified grassland	**Poor**	Fail	Fail	Pass	Pass	Fail	Pass	Pass	Grasscrete not heavily used

Woodland condition results

Condition Criteria:

A: Age distribution of trees: Good: Three age-classes, Moderate: Two age-classes, Poor: One age-class

B: Wild, domestic and feral herbivore damage: Good: No significant browsing damage evident in woodland, Moderate: Evidence of significant browsing pressure is present in 40% or less of whole woodland, Poor: Evidence of significant browsing pressure is present in 40% or more of whole woodland

C: Invasive plant species: Good: No invasive species present in woodland, Moderate: Rhododendron *Rhododendron ponticum* or cherry laurel *Prunus laurocerasus* not present, other invasive species <10% cover, Poor: Rhododendron or cherry laurel present, or other invasive species >10% cover

D: Number of native tree species: Good: Five or more native tree or shrub species found across woodland parcel, Moderate: Three to four native tree or shrub species4 found across woodland parcel, Poor: Two or less native tree or shrub species across woodland parcel

E: Cover of native tree and shrub species: Good: >80% of canopy trees and >80% of understory shrubs are native, Moderate: 50 - 80% of canopy trees and 50 - 80% of understory shrubs are native, Poor: <50% of canopy trees and <50% of understory shrubs are native

F: Open space within woodland: Good: 10 - 20% of woodland has areas of temporary open space, unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted, Moderate: 21 - 40% of woodland has areas of temporary open space, Poor: <10% or >40% of woodland has areas of temporary open space, but if woodland <10ha has <10% temporary open space, please see Good category

G: Woodland regeneration: Good: All three classes present in woodland; trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice regrowth, Moderate: One or two classes only present in woodland, Poor: No classes or coppice regrowth present in woodland

H: Tree health: Good: Tree mortality less than 10%, no pests or diseases and no crown dieback, Moderate: 11% to 25% tree mortality and or crown dieback or low-risk pest or disease present, Poor: Greater than 25% tree mortality and or any high-risk pest or disease present

I : Vegetation and ground flora: Good: Recognisable NVC plant community10 at ground layer present, strongly characterised by ancient woodland flora specialists., Moderate: Recognisable woodland NVC plant community at ground layer present., Poor: No recognisable woodland NVC plant community at ground layer present

J: Woodland vertical structure: Good: Three or more storeys across all survey plots, or a complex woodland, Moderate: Two storeys across all survey plots, Poor: One or less storey across all survey plots

K: Veteran trees: Good: Two or more veteran trees per hectare, Moderate: One veteran tree per hectare, Poor: No veteran trees present in woodland

L: Amount of deadwood: Good: 50% of all survey plots within the woodland parcel have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps, or an abundance of small cavities, Moderate: Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities, Poor: Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities

M: Woodland disturbance: Good: No nutrient enrichment or damaged ground evident, Moderate: Less than 1 hectare in total of nutrient enrichment across woodland area and or less than 20% of woodland area has damaged ground, Poor: More than 1 hectare of nutrient enrichment and or more than 20% of woodland area has damaged ground

Table2: Woodland condition assessment results

Ref	Habitat	Condition	A	B	C	D	E	F	G	H	I	J	K	L	M	Comments
W1	Other woodland; mixed	**Poor (24)**	Poor	Good	Good	Good	Poor	Moderate	Poor	Good	Poor	Poor	Poor	Moderate	Moderate	Alder, *Populus* sp., sycamore, Japanese maple, hawthorn, common lime *Salix* sp. Well pruned. Bramble and bare ground understory
W2	Other woodland; mixed	**Poor (24)**	Poor	Good	Good	Good	Moderate	Moderate	Poor	Good	Poor	Poor	Poor	Poor	Moderate	As W2 - field maple, elder, hawthorn, sycamore. Grassy understory.

Condition Assessment Result	**Condition Assessment Score**
Total score >32 (33 to 39)	Good
Total score 26 to 32	Moderate
Total score <26 (13 to 25)	Poor

Hedgerow condition results

Condition Criteria:

A1: Height > 1.5m average along length

A2: Width > 1.5m average along length

B1: Gap between ground and base of canopy <0.5 m for >90% of length*

B2: Gaps make up <10% of total length; and no canopy gaps >5 m

C1: Undisturbed ground and perennial vegetation

C2: Nutrient-enriched perennial vegetation makes up <20% cover

D1: >90% of the hedgerow and undisturbed ground is free of invasive non-native plant species

D2: >90% of the hedgerow or undisturbed ground is free of damage caused by human activities

E1: There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow

E2: At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity

Table3: Hedgerow condition assessment results

Ref	Habitat	Condition	A1	A2	B1	B2	C1	C2	D1	D2	E1	E2
H1	Native Hedgerow	**Good**	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	N/A	N/A

Appendix 3: Statutory Biodiversity Metric Calculator Tool

(available as a separate excel file)

Appendix 4: Summaries of Relevant Policy, Legislation and Other Instruments

6.1 This section briefly summarises the legislation, policy and related issues that are relevant to the main text of the report. The following text does not constitute legal or planning advice.

National Planning Policy Framework (England)

6.2 The Government issued the National Planning Policy Framework (NPPF) in August 2026 which provides the Government's plan making and development decision-making policies for England; the Introduction advises that '*It* [the NPPF] *is a material consideration of critical importance in both contexts*.' The NPPF advises that plan making and decision making policies are to be read as a whole including relevant footnotes and annexes with relevant weight to be applied, as detailed in the respective decision-making policies. Text excerpts from the NPPF, including relevant footnotes, are shown in italics where they may be relevant to planning applications and biodiversity including protected sites, habitats and species.

6.3 The Government sets out the three objectives for the delivery of sustainable development through the planning system (economy, social and environmental) at paragraph 17 (a, b and c). At paragraph 17 the Government advises that '*These objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across all three)…*'

6.4 The planning system's environmental objective is '*to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution*' (paragraph 17c).

6.5 In conserving and enhancing the natural environment, the objective of the NPPF policies (Chapter 19) '*is to influence the design and location of new development to help drive nature's recovery and contribute to wider environmental outcomes, safeguarding our most important habitats, species and landscapes and recognising the centrality of natural capital to delivering sustainable growth*.'

6.6 A series of six policies is provided in Chapter 19; Policy N1 relates to plan making, the remainder relate to national decision making.

6.7 In respect of plan making, Policy N1 (1) states that

'Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using Local Nature Recovery Strategies, Protected Landscape Management Plans, River Basin Management Plans, National Forest Strategies, Community Forest Plans and other relevant evidence at the most appropriate level to:

a. Set out the hierarchy of international, national and locally designated sites and areas of importance for their landscape, geodiversity or biodiversity value in the plan area, and identify other features which require particular consideration in managing development due to their environmental value such as chalk streams;

b. Identify opportunities for the conservation, enhancement and recovery of landscapes, sensitive waterbodies, habitats and priority or threatened species, including through habitat restoration, the use of nature-based solutions, and the creation and strengthening of ecological networks that are more resilient to current and future pressures (including opportunities which exist at a catchment or landscape scale across plan boundaries);

c. Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. This should include limiting the scale and extent of development within Protected Landscapes, avoiding the use of higher quality agricultural land where land of poorer quality is available and avoiding and minimising harm to designated sites of importance for nature. Areas which could become of particular importance for nature identified in Local Nature Recovery Strategies should be taken into account

as opportunities to integrate development with environmental restoration, but should not necessarily preclude the allocation of land for development; and

d. Set out standards for green infrastructure provision, in a way which complements and/or incorporates those for recreational land… These should draw upon Natural England's Green Infrastructure Standards for England[3], tailored as necessary to local circumstances.'

6.8 At N1 (2) there is specific reference to biodiversity net gain in relation to plan making polices as follows: *'Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Local standards should not extend to categories of development which are exempt from statutory biodiversity net gain.' A similar reference is included at Policy N2 (3) in relation to decision making for development proposals which further advises 'Decision makers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework…'*

6.9 Policy N2 provides a series of principles (a - g) that should be applied for development proposals to help meet the Government's objectives for the natural environment and nature recovery including reference to:

- the existing environmental qualities of land proposed for development that may have the opportunity for conserving or enhancing those qualities including through biodiversity net gain
- connecting and strengthening ecological networks beyond the site '*drawing on the measures proposed by Local Nature Recovery Strategies*…' and other locally relevant strategies,
- conserving and enhancing existing natural features including those of '*nature conservation value (such as established trees and hedgerows*' where possible…
- using green infrastructure for multiple reasons as part of the development design including for biodiversity
- the need to minimise '*any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective'*
- minimising the risk of failure of *'green infrastructure and other features to support nature'* through the design process and by securing any necessary long-term management.

6.10 Policy N2 advises that when determining planning applications, the following principles should apply; this approach is typically referred to as the NPPF mitigation hierarchy:

'If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused.'

6.11 The value of planting new trees as part of the design for new development proposals is detailed at Policy N3 (1) a – c as follows:

- New streets are to be tree-lined unless strong reasons why inappropriate and trees are to be incorporated into parks and the provision of community orchards
- Tree species selection is to take into account compatibility with highway and other infrastructure requirements and the needs of different users of public spaces
- Long term maintenance of existing and newly-planted trees is to be provided where they form part of the development proposal.

6.12 Policy N4 provides details of the requirements for major development proposals in Protected Landscapes including reference to '*Substantial weight should be placed on the importance of*

[3] GI Standards

conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads.' Where an exception is made for major development within Protected Landscapes mitigation of adverse impacts including '*features such as tranquillity and dark skies'* should be provided.

6.13 In respect of protected sites, habitats and species, at Policy N6 the Government advises the following:

'1. To support the conservation of important habitats, species and sites of geodiversity value, development proposals affecting:

a. A site of international importance, which for the purpose of this policy is a habitats site, should be refused unless:

i. An appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site (either individually or in combination with other developments), or the proposal can satisfy the derogation tests[4]; and/or

ii. The impact of development on the relevant protected features of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.

b. A site of national importance, which for the purpose of this policy is one designated as a Site of Special Scientific Interest, should only be supported if:

i. There would be no adverse effect (either individually or in combination with other developments) on the site's features of special scientific interest; or

ii. The benefits of the development in the location proposed clearly outweigh both the likely impact on the features of special scientific interest, and any broader impact on the national network of Sites of Special Scientific Interest; or

iii. The impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.

c. A site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if:

i. There would not be a significant adverse effect on the integrity of the site; or

ii. The benefits of development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation.'

6.14 At N6 (2) and (3) the Government provides advice that applies regardless of a site's designation status:

- '*development proposals which would entail the loss or deterioration of irreplaceable habitats, (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons[5] and a suitable compensation strategy exists* (Policy N6 (2))'
- '*that this policy applies to development on land inside or outside a designated area, if it would have an impact on the identified biodiversity or geodiversity value of the area concerned.'*

[4] These being that there are no feasible alternative solutions to the proposal which are less damaging, there are imperative reasons of overriding public interest for it to proceed, and compensatory measures are secured to ensure that the overall coherence of the network of habitats sites is maintained.
[5] For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of the relevant habitats.

6.15 The glossary of the NPPF (Annex B) defines an ancient or veteran tree as follows: '*A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.'*

Government Circular ODPM 06/2005 Biodiversity and Geological Conservation (England only)

6.16 Paragraph 98 of Government Circular 06/2005 advises that "the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Local authorities should consult Natural England before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species. They should also advise developers that they must comply with any statutory species' protection provisions affecting the site concerned..."

6.17 Paragraph 99 of Government Circular 06/2005[6] advises that "it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted".

Standing Advice (GOV.UK - England only)

6.18 The GOV.UK website provides information regarding protected species and sites in relation to development proposals: 'Local planning authorities should take advice from Natural England or the Environment Agency about planning applications for developments that may affect protected species.' GOV.UK advises that 'some species have standing advice which you can use to help with planning decisions. For others you should contact Natural England or the Environment Agency for an individual response.'

6.19 The standing advice (originally from Natural England and now held and updated on GOV.UK7) provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides advice on survey and mitigation requirements.

6.20 When determining an application for development that is covered by standing advice, in accordance with guidance in Government Circular 06/2005, Local planning authorities are required to take the standing advice into account. In paragraph 82 of the aforementioned Circular, it is stated that: 'The standing advice will be a material consideration in the determination of the planning application in the same way as any advice received from a statutory consultee…it is up to the planning authority to decide the weight to be attached to the standing advice, in the same way as it would decide the weight to be attached to a response from a statutory consultee.'

The Environment Act 2021

6.21 The Environment Act includes the requirement for mandatory biodiversity gain for all qualifying developments in England through an amendment to the Town and Country Planning Act 1990 which came into force on 12 February 2024. For all qualifying developments in England, The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 (SI44) at Regulation 3 advises in relation to planning applications that '*the biodiversity gain planning condition does not apply in relation to a planning permission within the scope of regulation 2 (2) of these Regulations, where the application for planning permission was made before 12th February 2024*'. From 12 February 2024, the Act and associated secondary Regulations (SI2024 No's 44- 50) insert

[6] *ODPM Circular 06/2005. Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impacts within the Planning System* (2005). HMSO Norwich.

[7] https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications#standing-advice-for-protected-species

amendments into the Town and Country Planning Act 1990 which in summary require the following for all qualifying developments in England:

- The provision of a required percentage of biodiversity gain, currently set nationally to be at 10%, as a general condition of planning permission,
- The use of the statutory Biodiversity Metric to calculate the biodiversity gain,
- Submission to and approval by the planning authority, of a Biodiversity Gain Plan (BGP) for the development before the development may be begun; the BGP is to be prepared using a template prepared by Defra to demonstrate how biodiversity gain will be delivered on and / or off-site and how the biodiversity gain hierarchy has been applied so that the local planning authority can take account of the approach taken when deciding whether to approve the BGP,
- Significant on-site biodiversity gain and all offsite biodiversity gain to be secured for a fixed period, currently nationally set at 30 years,
- Alternative arrangements to be made for the purpose of minimising the adverse effect of development to habitats deemed to be irreplaceable habitat (see NPPF),
- Demonstration of how the biodiversity gain will be secured, typically through planning obligations in a section 106 agreement,
- Registration of offsite biodiversity gain and allocation of relevant biodiversity units to a given development in a national register for which Natural England is the Register Operator,
- Use of statutory biodiversity credits through the Secretary of State, which is considered to be a last resort, if onsite and/or offsite biodiversity gains cannot achieve the required percentage.