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PRIVATE AND CONFIDENTIAL

13/11/2024
Project Name: Proposed Battery Energy Storage System, Corriemoillie
Project Reference: 65212332
Document Reference: 65212332-SWE-XX-XX-T-J-0001-R4

Proposed Battery Energy Storage System, Corriemoillie - Biodiversity Enhancement Assessment

To whom it may concern,

Introduction

This Biodiversity Enhancement letter report has been prepared by Sweco for the Client and relates to the proposed development at Corriemoillie sub-station, Garve, EV23 2PY for which planning permission will be sought. Proposals, hereafter referred to as 'the proposed development', are understood to involve the construction of a new battery storage facility, as shown on TGP Landscape Architects drawing titled Landscape Plan LVA Figure 5 (Job 2211, No L01, Revision E). For the purpose of this letter report 'the development footprint' refers to the proposed battery location, associated soft landscaping, access tracks and temporary compound location. The 'offset area' refers to the area to the north in which habitat offsetting is proposed. The 'site' collectively refers to both the development and the offset areas a whole.

A UK habitat classification (UKHab) survey was undertaken for the site on 22 February 2024 and 23 – 24 September 2024 and the findings are included herein and in the report of the ecological impact assessment [1].

Following guidance from the Highland Council, the latest version of DEFRA's Statutory Biodiversity Metric [2], hereafter referred to as 'the metric', has been used to calculate whether the post-development biodiversity enhancement of at least 10% is achieved.

The scope of this document is to detail the results of the metric calculations to demonstrate whether the proposed development will result in the target 10% enhancement in biodiversity.

Methodology

The metric [2] was used to calculate whether the proposed development will achieve a 10% enhancement in biodiversity. This was completed following the guidance produced for the metric [2]. The calculations have been undertaken with the understanding 'on-site' includes all habitats within the development footprint. All baseline habitats and proposals within the offset area have been included within the calculations as off-site.

The metric is divided into three sections: area-based habitats, hedgerow linear habitats, and watercourse linear features. The overall gain in biodiversity of the proposed development is taken as the lowest-scoring change of these different habitat groups. There are no hedgerow linear habitats within the development boundary nor are any expected to be impacted by the works in the immediate surroundings and as such, linear habitats do not feature within the calculations for the proposed development.

The Highland Council Local Plan [3] [4] and NatureScot SiteLink [5] was reviewed to assess the strategic significance of the site and habitats within it (i.e. to determine whether the site and/or habitats are identified within, or adjacent to areas identified within, planning policy or designated sites).

The information entered into the metric comprised:

- Broad Habitat;
- Habitat Type (used to determine Distinctiveness);
- Area (ha) OR Length (km);
- Condition (N/A, Poor, Moderate, Good); and
- Strategic Significance (whether the location is within the local plan (e.g. within a Biodiversity Opportunity Area) or not).

This data then provided a calculation of the biodiversity units for each habitat parcel which when summed gives the total biodiversity units of the site as a whole. The formula is set out below for the baseline (baseline is here defined as the pre-development) units:

Baseline Biodiversity Unit=
(Area x Distinctiveness x Condition) x (Strategic Significance)

The site baseline was taken to be the habitat types, areas and conditions on site during the UKHab survey and condition assessments undertaken on 22 February 2022 and 23 – 24 September 2024. Habitat types and descriptions are detailed within the ecological impact assessment report [1].

The above data also forms part of the calculation of units for post-development proposed created habitats. However, this calculation, shown below, also includes temporal, spatial and delivery risk factors.

A 5-year advance has been applied to the creation of good condition upland heathland within the offset area to the north. Following a review of aerial imagery, namely Google Earth, it can be confirmed that the site has been subject to historical clearance of coniferous woodland. Aerial imagery from 2006 shows the development area following clearance, with habitats visible in 2019 and the UKHab survey undertaken in September 2024 confirming the presence of good condition upland heathland within this area. As such it can be determined that following clearance of coniferous woodland upland heathland can naturally establish and reach a good condition within 18 years.

The review of aerial imagery established that the offset area was felled between 2006 and 2019. Therefore, natural regeneration of this area has begun at the latest by 2019, and as such a 5-year advance on upland heathland creation is appropriate.

The habitats to be retained and created within the development footprint were taken to be the proposed habitats as shown on TGP Landscape Architects drawing titled Landscape Plan LVA Figure 5 (Job 2211, No L01, Revision E). All area-based habitats will target good condition, with the exception of other broadleaved woodland which will target moderate condition in accordance with the metric condition assessments [2]. Created ditches will target good condition in accordance with the metric condition assessments [2]. Proposed individual trees have been input into the metric as 'small' in accordance with the metric [2] size classifications following confirmation from the Client that all trees would be planted at 8 – 10cm diameter breast height.

As the construction phase is anticipated to run between September 2027 and June 2029 inclusive (21 months) and pre-construction works could be undertaken on site up to six months in advance of construction (resulting in a potential habitat creation delay of 27 months) a 2-year delay has been input into the metric calculations for habitat creation within the development footprint. The exception to this is creation of upland acid grassland in the west of the development area outside of the area of development and cutting and creation of upland heathland and ditch in the offset area. Habitat creation within these areas would commence at the onset of construction, or within 1 year of the onset of construction.

Baseline Biodiversity Enhancement Calculations

Strategic Significance

The site location was determined to not be in an area of moderate or high strategic significance and was classified within the category of 'area/compensation not in local strategy/no local strategy'. This was based on searches within the Highland Council local plan [3] [4] which did not include the site within a relevant local strategy and NatureScot SiteLink [5], which showed no priority habitats on or adjacent to the site.

Baseline Biodiversity Units

The site comprises other upland acid grassland (g1b6), bracken (g1c), upland birchwoods (w1e), other scots pine woodland (w2b), other coniferous woodland (w2c), wet heathland

with cross-leaved heath, upland (h1b6), artificial, unvegetated, unsealed surface (u1c), a culvert (r1g) and ditches (r1g 50). The UKHab habitat types and their equivalent DEFRA Biodiversity Net Gain (BNG) habitat type for area-based and watercourse linear habitats are shown in Table 1 and Table 2 respectively.

Full details of the metric [2] calculations are provided in accompanying document 65212332-SWE-XX-XX-T-J-0002-R2-Statutory Biodiversity Metric. The metric summarises the baseline area and watercourse linear habitats present on site respectively, with their assessed conditions, baseline area or length and biodiversity units.

Table 1. Summary of the baseline area-based habitats present

UKHab classification	BNG Habitat Type	Area (ha)	Distinctiveness	Condition	Units
Within the development area					
Other upland acid grassland (g1b6)	Upland acid grassland	0.32	Medium	Good	3.84
Wet heathland with cross-leaved heath, upland (h1b6)	Upland heathland	0.46	High	Good	8.28
		0.62		Moderate	7.44
		0.32		Poor	1.92
Other coniferous woodland (w2c)		5.6	Low	Poor	11.2
Artificial unvegetated, unsealed surface (u1c)		0.17	Very low	N/A	0
Upland birchwoods (w1e)		0.03	High	Poor	0.18
Bracken (g1c)		0.02	Low	N/A	0.04
Other Scot's pine woodland (w2b)		0.07	Medium	Moderate	0.56
Developed land; sealed surface (u1b)		0.11	Very low	N/A	0
				Total	**33.46**
Within the offset area					
Other coniferous woodland (w2c)		2.9	Low	Poor	5.8

Table 2. Summary of the baseline watercourse linear habitats present

UKHab classification	BNG Habitat Type	Length (km)	Distinctiveness	Condition	Units
Within the development area					
Ditches (r1g 50)		1.5	Medium	Poor	5.42
Culvert (u1 851)		0.08	Low	N/A	0.11
				Total	**5.53**

Post-development Biodiversity Enhancement Calculations

Area-based Habitat

Habitat Retention

Through embedded mitigation (mitigation through design) the high distinctiveness upland birchwoods and other Scot's pine woodland in the south-east corner of the development footprint will be retained in full. Additionally, 0.2ha of the high distinctiveness upland heathland habitat along the southern boundary of the development footprint and 0.16ha of good condition acid grassland to the west of the cutting area will also be retained. Retained habitat areas within the development footprint are shown on TGP Landscape Architects drawing titled Landscape Plan LVA Figure 5 (Job 2211, No L01, Revision E).

The below biodiversity units would be retained within the development footprint:

- 0.18 units from retention of all (0.03ha) upland birchwoods
- 0.56 units from retention of all (0.07ha) other Scots pine woodland
- 3.6 units from retention of 0.19ha of good condition upland heathland
- 1.92 units from retention of 0.16ha of good condition acid grassland

Habitat retention will also include 0.09ha of developed land; sealed surface along the access track to the south of the battery location. As this habitat if of very low distinctiveness, it is not worth any biodiversity units.

Habitat Creation

Habitats which will be created within the site as part of the landscaping for the proposed development are shown on TGP Landscape Architects drawing titled Landscape Plan LVA Figure 5 (Job 2211, No L01, Revision E) and include native woodland, upland scrub mix, individual native broadleaved trees, species-rich acid grassland and sustainable urban drainage systems (SuDS) including three drainage basins and a bioswale. Upland heathland will also be created, in the offset area to the north. Table 3 details habitat creation within the site and the units delivered.

Table 3. Summary of the post-development area-based habitats created on site

UKHab classification (landscape plan name)	BNG Habitat Type	Area (ha)	Distinctiveness	Condition	Units
Within the development area					
Other upland acid grassland (g1b6) - (Species-rich acid grassland)	Upland acid grassland	2.29	Medium	Good	15.18
Bioswale (g 849) – (Swale)	Bioswale	0.02	Low	Good	0.07
SuDS (g 848) – (SUDS basin)	Sustainable drainage system	0.15	Low	Good	0.47
Other woodland; broadleaved – (Proposed native woodland)	Other broadleaved woodland	0.37	Medium	Moderate	1.62
N/A - (Native broadleaved tree)	Individual rural tree	0.0489	Medium	Good	0.19
Mixed scrub – (Proposed upland scrub mix)	Mixed scrub	0.8	Medium	Good	6.26
				Total	**23.79**
Within the offset area					
Wet heathland	Upland heathland	2.9	High	Good	14.35

UKHab classification (landscape plan name)	BNG Habitat Type	Area (ha)	Distinctiveness	Condition	Units
with cross-leaved heath, upland (h1b6)					

As the trading standards[1] in-built into the metric [2] with regards to upland heathland cannot be met within the development area whilst also delivering 10% biodiversity enhancement, the Client will be required to purchase 2.9ha of poor condition felled other coniferous woodland within the offset area to the north of the development area to create further upland heathland, which if creation commences at the onset of construction or less than one year from the onset of construction would sufficiently offset loss of this habitat and meet the trading standards in-built into the metric [2].

Linear Watercourse Habitat

Habitat Retention

Habitat retention would include retention of 0.1km of existing ditch within the development area west of the cutting, as shown on TGP Landscape Architects drawing titled Landscape Plan LVA Figure 5 (Job 2211, No L01, Revision E). This retention of 0.1km of ditch would result in retention of 0.4 baseline units.

Habitat Creation

Habitat creation will include creation of 1.02km of ditch (as partially shown on TGP Landscape Architects drawing titled Landscape Plan LVA Figure 5 (Job 2211, No L01, Revision B)) with a further section confirmed by the Client and shown on the final Surface Water Drainage Strategy drawings) targeting good condition which would deliver 5.35 watercourse linear units.

Habitat creation would also include creation of 0.2km of ditch, targeting good condition, within the offset area to the north, with creation commencing at the onset of construction or within one year of the onset of construction. This would deliver a further 1.13 linear watercourse units.

Conclusions

[1] Trading standards are a set of rules in-built into the metric to ensure habitat unit replacement is appropriate for the habitats lost with regards to habitat distinctiveness. As a high distinctiveness habitat upland heathland units lost require compensation with units form the exact same habitat type (i.e. upland heathland).

The biodiversity enhancement calculations detailed within this letter report and within accompanying document 65212332-SWE-XX-XX-T-J-0002-R2-Statutory Biodiversity Metric demonstrate that, under the proposals detailed on TGP Landscape Architects drawing titled Landscape Plan LVA Figure 5 (Job 2211, No L01, Revision E), and on the final Surface Water Drainage Strategy drawings with regards to ditches, the proposed development would deliver a 15.31% biodiversity enhancement for area-based habitats (+5.12 units) and 24.33% biodiversity enhancement for linear watercourse habitats (+1.35 units).

Within the post-development biodiversity enhancement calculations, all proposed habitats have been assigned a target condition. It will be necessary for post-development management practices to ensure each proposed habitat meets the required number of condition criteria under the metric condition assessments [2] to achieve the conditions targeted within the calculations. It is recommended that a Habitat Management and Monitoring Plan (HMMP), detailing measures specific to the required conditions of the habitats, is developed. While BNG is not mandatory in Scotland, to ensure the effective delivery of the proposed biodiversity enhancements, habitats retained, enhanced and created on site will be managed and monitored for at least 30 years.

Yours faithfully

[redacted]

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[redacted]

References

[1] Sweco, “Ecological Impact Assessment. Proposed Battery Energy Storage System, Corriemoillie. Revision P02,” Sweco, 2024.

[2] DEFRA, “Guidance: Statutory biodiversity metric tools and guides,” 2024. [Online]. Available: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides. [Accessed October 2024].

[3] The Highland Council , “Highland-wide Local Development Plan,” 2012. [Online]. Available: file:///C:/Users/GBBEMT/Desktop/Highland_wide_Local_Development_Plan.pdf. [Accessed October 2024].

[4] The Highland Council, “Highalnd-wide Local Development Plan - Proposals Map,” The Highland Council, 2012. [Online]. Available: file:///C:/Users/GBBEMT/Desktop/Proposals_map.pdf. [Accessed October 2024].

[5] NatureScot, “NatureScot SiteLink,” [Online]. Available: https://sitelink.nature.scot/home . [Accessed October 2024].