National Grid Visual Impact Provision (VIP) Peak District East Project

Biodiversity Net Gain Statement of Proposals

7th November 2019

Background

1. The Visual Impact Provision is an important national initiative addressing the significant landscape and visual impact that high voltage electricity infrastructure can have in National Parks and Areas of Outstanding Natural Beauty in England and Wales. It is an initiative that consumers support and one that stakeholders nationally, and regionally have vociferously called for and lobbied Ofgem, the regulator, to ensure was put in place.

2. It was here in the Peak District, because of the significant impact that sections of overhead line have here at Dunford Bridge and west of the Woodhead Tunnels in the Longdendale Valley, that calls for the VIP provision to be put in place and representations to the regulator started. The Peak District National Park Authority, CPRE, Friends of the Peak District, Campaign for National Parks and other campaigners were all instrumental in citing the impacts of the line here and pushing for the VIP provision to be made.

3. This section of overhead line in the Peak District, is one of just four prioritised for burial below ground by a national Stakeholder Advisory Group. It was selected from over 120 sections of overhead line in National Parks and AONBs in England and Wales, specifically because it has among the most adverse landscape and visual impacts and therefore would deliver potentially the greatest benefits from being buried below ground.

4. It represents a major opportunity to conserve and enhance the natural beauty, wildlife and environmental heritage of this precious Peak District landscape. The removal of 2km of existing high voltage overhead line including 8 pylons and the associated re-design of the Trans Pennine Trail car park at Dunford Bridge will result in a wide range of environmental gains. These benefits will transform one of the gateways to the Trans Pennine Trail, and the wider National Park, for residents and visitors alike.

5. National Grid is committed to delivering the improvements in the most environmentally sensitive way. Ensuring that the Proposed Project delivers a sound and valuable net gain to biodiversity is one of the projects key priorities. This statement is provided as part of supporting information to planning application 2019/1013. It provides further information on proposals to achieve biodiversity net gain following on from the Net Gain Position Statement submitted with the planning application in August 2019.

6. Throughout the project, we have sought to work closely with Barnsley Metropolitan Borough Council, the Peak District National Park Authority, Natural England, Yorkshire Wildlife Trust, the Trans Pennine Trail office and others to explore and identify opportunities to compensate for habitat and species adversely impacted by the Proposed Project. The knowledgeable input and assistance of stakeholders received to date has been invaluable and we commit to

continuing to collaborate with all relevant stakeholders to deliver a positive net gain. Following the planning submission, we have recently had the opportunity to meet with officers again from Yorkshire Wildlife Trust and Barnsley Metropolitan Borough Council to discuss updated proposals to achieve biodiversity net gain.

7. Stakeholders have continued to express a strong preference for biodiversity net gain opportunities to be as close as possible to the proposed project. Following the submission of the application we have continued to review opportunities close to the site, in addition to the onsite mitigation and enhancement package proposed as part of the Landscape and Ecological Management Plan (LEMP). We have continued discussions with landowners to further ensure that any proposals being put forward are feasible in line with current and proposed land management practices, and deliverable as part of a range of agreements.

Biodiversity Net Gain Assessment

8. A Biodiversity Net Gain (BNG) Assessment has been undertaken by Aecom to help quantify biodiversity impacts and inform our proposals. A BNG assessment involves making a comparison between the biodiversity value of habitats present within the site prior to a development or project and the biodiversity value of habitats present following the completion of the development or project. The comparison is undertaken in terms of 'biodiversity units', with a 'biodiversity metric' providing the mechanism to allow biodiversity values to be calculated and compared.

9. The assessment was carried out using the Biodiversity Metric 2.0 (JP029) published by Natural England in July 2019. A summary report is appended at Appendix 1. This sets out the results of the BNG assessment for the proposed project and provides recommendations relating to habitat creation and enhancement to deliver biodiversity net gain. The Metric approach has been adapted to enable practitioners to calculate the losses and gains of a given development or project by assessing the distinctiveness (i.e. type of habitat and its value), condition and extent of habitats on site pre- and post-development. The Metric, an excel spreadsheet comprising of a series of separate sheets; one for each of the key habitat data components, has embedded formulae which translates habitat data into 'biodiversity units'. The Metric for the proposed project including calculations for the sites proposed for enhancement is provided as supplementary information at Appendix 2.

10. In order to achieve net gain, a development or project must have a higher biodiversity unit score after the development or project has been undertaken than before. A series of standard 'risk multipliers' are applied to the post-development habitats to acknowledge the inherent risks of creating and restoring habitats and the time taken to establish habitats. This has the effect of reducing the value of the proposed habitats which means larger areas, habitats of higher distinctiveness and/or condition are required to achieve net gain.

11. Until the upcoming Environment Bill formalises the guidelines for biodiversity net gain (announced by the government on 15/10/19), based upon feedback received by DEFRA to the

formal biodiversity net gain consultation held in 2018/2019, commitments to net gain should seek to achieve a gain of around 10% using Metric 2.0.

12. The results of the BNG assessment demonstrate that an overall **net loss of -18.32 biodiversity units or a 20.21% loss in biodiversity post-development would occur without offsite enhancements**. An extensive range of 23 potential sites have been considered that could be taken forward for enhancement to enable the Proposed Project to achieve a net gain. These are presented in Table 1 of the BNG Summary report and Figure P10727-00-001-114 at Appendix 3.

13. The BNG report recommends that a combination of the following sites: A, B, J1 and J2 are considered to be taken forward to achieve a net gain, should the project be granted planning consent.

Proposed Sites

14. National Grid is committed to achieve an increase in net gain in excess of the 10% government target. This is based on providing net gain across the entire proposed project, not just the elements that require planning permission. To achieve a 10% net gain on the proposed project the offsite enhancements would need to achieve a minimum of 27.398 biodiversity units.

15. A review of the available sites A, B, J1 and J2 has been undertaken by National Grid. Taking into account a range of factors including the potential to maximise enhancement and gain, the nature and diversity of enhancement measures possible, site constraints, feasibility, deliverability and some initial stakeholder feedback it is proposed that sites A, B and J1 are taken forward should the project be granted planning consent. These are highlighted on the attached Figure P10727-00-001-114 02.

16. The sites comprise Yorkshire Water owned land and plantations at Dunford Bridge and Winscar. The areas offer really valuable opportunities to improve habitat distinctiveness and condition and contribute towards gains for biodiversity. Full detailed management plans would need to be prepared for the sites, but a summary of proposed enhancements has been provided below.

17. The following combination of sites as a package will deliver a net gain of **approximately 11.04%, which is above the anticipated 10% government target**.

18. **Site A *Diversification of Dunford Bridge Plantation,*** offers opportunities to diversify the coniferous woodland comprising stages of thinning and ground flora improvements supplemented by some broadleaved tree planting and removal of Rhododendron from the understory. Additional thinning could be undertaken within the majority of the plantation block to open up and increase light for ground flora regeneration. Removal of small discreet blocks of conifers and replanting broadleaved species would result in a more diverse woodland edge habitat. This could tie with the landscaping proposals in the area of the former Sealing End Compound (SEC) once reinstated to grassland and would also supplement connectivity to existing broadleaved scrub/young woodland located close by.

19. **Site B *Diversification of Winscar Reservoir Plantation,*** comprises similar works to that proposed in site A, with proposals seeking to diversify the coniferous woodland habitat by undertaking selected thinning and removal of dead stands to open up the understorey and enhance the ground flora. Additional edge broadleaved woodland planting could be undertaken adjacent to the reservoir car park and on the boundary with area J1 to improve connectivity.

20. **Site J1 *Heath and Grassland Mosaic Improvement/Restoration, east of Winscar Reservoir*** offers the greatest net gain opportunities with proposals to enhance/restore the heath/acid grassland mosaic which has been affected and degraded by historic tree planting preparation works. Management prescriptions for this type of proposal are well documented and so whilst this is a long term prospect, successful precedents have been achieved for heathland restoration projects in similar situations nationally. Restoration works could also seek to create some areas of mosaic habitat linking into edge scrub planting and supplementary heath seeding could also be undertaken. Other measures such as selected grips installation or seeding with heath species as well as sensitive selected grazing would be introduced once more established to reduce some of the dominant grassland habitats. Principles would be to enhance the botanical condition of the habitats and provide greater opportunities for birds, invertebrates and other species such as reptiles/amphibians.

21. Taking forward J1 in combination with the adjacent Site B would meet the Lawton Principles of 'bigger, better more connected' habitat sites. The site once restored in combination with diversification of Area B and additional broadleaved planting around the fringes would provide a well-connected linking habitat between the land within the SPA west of Winscar reservoir and the area known as Tinker Hill, known to also be of interest to birds.

22. Should a different combination of the sites A, B, J1 and J2 be deemed preferable by Barnsley Council during the planning determination, this can be considered, taking into account how far land agreements have progressed at that time.

23. National Grid has included replacement tree planting within its proposals, based on an approximate 2:1 ratio. A proportion of the planting will be at the site of the proposed project, with additional areas if planting incorporated into the above sites. In addition to the offsite net gain enhancements put forward within this report, the LEMP contains the extensive onsite mitigation and enhancement package proposed.

24. The net gain will be secured and delivered via arrangements agreed with the local planning authority and landowners. This may include commitments secured via the Town and Country Planning Act 1990 and/or the Wildlife and Countryside Act 1981.

25. Table 1 overleaf provides a summary of the 3 sites, and the proposed mechanism to secure the necessary agreements.

Table 1:

Site Ref	Area (Ha)	Habitat Units Achievable	Description	Duration of commitment required (years)	Proposed mechanism/agreements to secure delivery of proposed enhancement	Current Status with landowners
A	9.860	31.28	Diversification of Dunford Bridge Plantation	25	A planning condition requiring National Grid to enter into a planning obligation under Section 106 of the Town & Country Planning Act 1990 is envisaged, should planning consent be granted. The Obligation would relate to securing net gain by habitat management. The Planning Obligation would require: 1) Appropriate land (Yorkshire Water Land identified); 2) Management Regime (Yorkshire Water and/or a 3rd party management organisation); 3) Inspection and Reporting (Potential 3rd Party to be agreed); and 4) Funding (by National Grid) This would be delivered via a Habitat Management Agreement for Sites A, B and J1 between the above parties. Yorkshire Water would continue to own, occupy and manage the sites, The Habitat Management Agreement could be made via a lease or via Section 39 of the Wildlife & Countryside Act 1981 Agreement of the latter would require Barnsley MBC to sign as a Relevant Authority.	Agreement in principle with the landowner. Draft Heads of Terms for a Habitat Management Agreement have been provided to the landowner for consideration (October 2019)
B	4.116	21.29	Diversification of Winscar Reservoir Plantation	25		
J1	10.516	166.06	Area east of Winscar Reservoir – Heath and Grassland Mosaic Improvement/ Restoration	25		

Conclusion

26. National Grid is committed to delivering the proposed project in the most environmentally sensitive way. Delivering a net gain to biodiversity in excess of the 10% government target, and in accordance with national and local planning policy is a priority. This is based on providing the net gain across the entire project, not just the elements that require planning permission. We share the aspiration to see the potential ecological impact of our proposals minimised to the greatest extent possible, and any residual impacts mitigated and compensated for through:

    - delivering measures on site as identified in the outline Landscape and Ecological Management Plan (LEMP); and
    - by delivering a wider net gain in biodiversity off site to provide positive benefits to the ecology of the local area.

27. The proposed project complies with Barnsley MBC's Supplementary Planning Document (SPD): Biodiversity and Geodiversity (May 2019) that supplements several Local Plan policies (as detailed in Appendix 7N of the EAR). The mitigation hierarchy of 'avoid, mitigate, compensate' as set out in the SPD has been followed. A detailed Options Appraisal Report has been provided as part of the planning application which includes discussion of the 'do nothing option' and the predicted future environmental conditions that would exist if the proposed project did not materialise. We have sought to mitigate impacts throughout the design stage by minimising the footprint of the proposed project to remove significant effects upon the most valued ecological features, as referenced in the SPD. As well as minimising land take and disturbance within Wogden Foot LWS for the SEC, this has included designing the route and minimising the width of the cable corridor (although not part of the planning application), to reduce the amount of tree and scrub habitat loss and ensure ecological connectivity is maintained along the Trans Pennine Trail/River Don corridor.

28. As documented within Chapter 7 of the Environmental Assessment Report, although the proposed project will result in some effects upon statutory and non-statutory sites, with mitigation incorporated during and post construction, the direct and indirect effects upon these sites has been avoided, reduced or mitigated such that the overall residual effects will not be significant. Similarly, the residual effect following the incorporation of mitigation measures on undesignated habitats are not significant. A range of mitigation measures will be delivered as set out in principle in the outline LEMP to avoid and minimise potential effects to ecological features. Proposed monitoring/maintenance plans meet or exceed the required durations specified within the SPD.

29. Opportunities to provide additional ecological gains for enhancement (or creation) of habitats and benefits for species which are predicted to be subject to adverse effects have been pursued with stakeholders throughout the development of the Proposed Project.

30. The permanent loss of 0.28Ha of habitat within Wogden Foot Local Wildlife Site represents less than 3% of the total area of the LWS boundary. Mitigation measures to address temporary and permanent effects have been extensively discussed with stakeholders and details are presented in the Ecological Impact Assessment (EcIA) and the outline LEMP.

31. The EcIA concludes that the proposed project would not have an impact on the integrity of Wogden Foot LWS, nor would it prevent the LWS criteria to continue to be met, albeit with areas which would be in recovering status. The permanent and temporary effects would not result in the remaining habitats within the LWS failing to meet the same selection criteria that resulted in the current LWS designation. The residual effects would not result in long-term decline of the integrity and ecological function of the habitats that are retained, replaced, and subsequently managed, and the qualification for LWS designation would not be threatened.

32. On site mitigation includes the restoration of notable habitats and measures for willow tit, bats, birds, reptiles and invertebrates. Habitats temporarily affected by the Proposed Project will be restored to a mosaic of habitats as discussed with stakeholders. A period of seven years management and monitoring of these areas has been committed to in Wogden Foot LWS via the adoption of the draft LEMP.

33. On site compensatory 'like for like' opportunities to offset the net loss of 0.28Ha of habitat with Wogden Foot LWS are limited given the nature of the site within the context of the local landscape. The specific Wogden Foot habitats are dependent on the ballast substrate conditions as a default of its previous use. As such no available areas have been identified on site that would offer a direct or 'like for like' creation/enhancement opportunity for the specific grassland type being permanently lost. A more similar compensation approach to support, enhance or create a grassland/scrub mosaic type site elsewhere within the Borough (there are a number of former railway sidings or former industrial sites of conservation interest) would be feasible and could be supported by National Grid. However, stakeholders have continued to express a strong request for biodiversity net gain opportunities to remain in immediate proximity to the proposed project.

34. Therefore, following input from stakeholders we have undertaken a comprehensive review and assessment of 23 sites which offer potential for additional alternative off site compensation and enhancement in the vicinity of the proposed project. The sites put forward have in principle land owner agreement and provide opportunities to improve habitat distinctiveness and condition and therefore to contribute towards gains for biodiversity. A combination of sites A, B and J1 as a package will deliver a strong net gain of approximately 11.04%, in excess of the 10% government target. The SPD (2019) allows for off-site compensation at Section 4.1 "*.... On occasion, the LPA may allow compensatory works on other sites outside of the development where avoidance or mitigation are not possible/sufficient, but this should be seen as a last resort*". The policy does not restrict this to sites in the immediate area and casting the net more widely would give rise to further opportunities.

35. The Trans Pennine Trail habitat corridor will be predominantly retained, providing alternative suitable commuting, nesting and foraging territory habitat for willow tit further east and west of the proposed SEC/working area in Wogden Foot. The River Don embankment and adjacent tree and scrub cover present along the northern boundary of the LWS also provides suitable habitat for willow tit to during the for the construction period and have been indicated to be the optimal habitat for nesting within Wogden Foot LWS as it more mature than the successional scrub. Measures to enhance nesting opportunities for willow tit through provision of standing dead wood and nest boxes in suitable habitat areas outside the working area have been included in the outline LEMP. It is considered the mitigation measures to address the effects upon willow tit are sufficiently appropriate to the level of predicted effects. It is recognised in the EcIA that the proposed project would result in a minor adverse effect upon willow tit as a result of the temporary loss of one territory and displacement of a second. Given the adoption of the proposed mitigation measures, including the embedded design which retains the majority of the optimum habitat for this species, this is not considered to result in a long term significant adverse effect on willow tit in the absence of the Proposed Project.

36. With regard to International sites, Natural England have agreed with the findings of our Habitat Regulation Screening Report in respect that no likely significant effects upon European Sites are predicted, and confirmed they have no objection to the application in their consultation response received on 23/09/19.

37. The biodiversity net gains we are seeking to achieve are part of a set of wider substantial benefits offered by the proposed project in landscape, visual and environmental terms. The removal of 2km of existing high voltage overhead line including 8 pylons, and the re-design and improvement of the Trans Pennine Trail car park at Dunford Bridge will deliver a lasting positive benefit which will significantly enhance the visitor experience at this gateway to the National Park. These benefits will be felt by users of the Trans Pennine Trail, the wider National Park, residents and visitors alike. The proposals have been developed with extensive input from local stakeholders and received strong public support in our most recent public consultations. National Grid is committed to continuing to work with stakeholders to deliver these improvements in the most environmentally sensitive way, including the delivery of a net gain for biodiversity.