



Dudgeon and Sheringham Shoal Offshore Wind Farm Extensions

Preliminary Environmental Information Report

Volume 3

Appendix 22.6 - Outline Biodiversity Net Gain Strategy

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Prepared by:	
Royal HaskoningDHV	
Approved by:	Date:
Magnus Eriksen, Equinor	29th April 2021

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Glossary of Acronyms

BNG	Biodiversity Net Gain
DEP	Dudgeon Extension Project
FEP	Farm Environment Plan
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
SEP	Sheringham Shoal Extension Project

Glossary of Terms

The Applicant	Equinor New Energy Limited
The Dudgeon Offshore Wind Farm Extension Project (DEP)	The Dudgeon Offshore Wind Farm Extension site as well as all onshore and offshore infrastructure.
PEIR boundary	The area subject to survey and preliminary impact assessment to inform the PEIR, including all permanent and temporary works for DEP and SEP. The PEIR boundary will be refined down to the final DCO boundary ahead of the application for development consent.
The Sheringham Shoal Offshore Wind Farm Extension Project (SEP)	The Sheringham Offshore Wind Farm Extension site as well as all onshore and offshore infrastructure.

22.6 OUTLINE BIODIVERSITY NET GAIN STRATEGY

22.6.1 Biodiversity Net Gain Policy Background

1. The Government's 25 Year Environment Plan describes an ambition to leave the environment in a better state than that which it inherited for the next generation. This ambition is supported by the National Planning Policy Framework (NPPF), which makes general provisions for the delivery of biodiversity net gain (BNG).
2. The Environment Bill, introduced to the Parliament in October 2019, contains measures on planning policy including BNG under which developers are mandated to ensure biodiversity sites are enhanced by a factor of at least 10%. Mandatory BNG under the Environment Bill will come into force during a two-year transition period which begins once the Bill receives royal assent.
3. Defra confirmed their intention to bring forward legislation to mandate BNG within the Environment Bill but that nationally significant infrastructure projects (NSIPs) and marine development would, at least in the near-term, remain beyond the scope of the mandatory requirements, stating "*further work and engagement with industry and conservation bodies is required to establish approaches to biodiversity net gain for both..., which can have fundamentally different characteristics to other development types...*". The Government advised these types of projects will be brought within the mandatory BNG approach in the future.

22.6.1.1 Local Policy

22.6.1.1.1 Norfolk County Council's Environmental Policy

4. The Norfolk County Council's Environmental Policy states that 'environmental net gain' principle will be embedded in all developments, including housing and infrastructure. It also advises that focus of the net gain opportunities should be on the priority habitats and species in Norfolk as identified by the Norfolk Biodiversity Partnership and applications should seek to contribute positively to identified Green Infrastructure corridors.

22.6.2 Biodiversity Net Gain Definition

5. CIEEM has defined BNG as a *goal for a development project, policy, plan or activity in which the impacts on biodiversity are outweighed by measures taken to avoid and minimise the impacts, to restore affected areas and finally to offset the residual impacts, to the extent that the gain exceeds the loss. BNG must be defined relative to an appropriate reference scenario* (CIEEM, 2019).
 - Approach to BNG as recommended by CIEEM:
 - Engagement with the Local Authority to understand whether local biodiversity plans supported environmental enhancement opportunities;
 - Requested input from local and statutory stakeholders for environmental enhancement opportunities (on and offsite);
 - Secured provisional project backing and budget availability; and
 - Included a high-level commitment to environmental enhancement.

22.6.3 Biodiversity Net Gain Requirement

6. BNG is to be applied for all developments under the Town and Country Planning Act, which includes terrestrial, coastal and intertidal habitats down to the mean low water mark. As stated in the Biodiversity Net Gain Policy Background, at the time of writing there is no statutory requirement for NSIPs to deliver BNG.
7. Natural England has stated that the net gain principle should not be applied to protected sites or to habitats which are categorised as 'irreplaceable' and does not change the protection afforded to biodiversity within these areas. This is to uphold existing legal and policy protection for these sites and ensure proper application of the mitigation hierarchy so that compensation is clearly a last resort. This means that statutory obligations remain and existing levels of protection afforded to species and habitats within and outside designated sites will not be changed (Natural England, 2019). However, this does not mean that BNG should not be applied in protected areas, only that it is a separate requirement (where it applies).
8. Marine developments, even if not NSIPs are also exempt from BNG requirements. The biodiversity metric used to measure biodiversity has not been developed for subtidal habitats with intertidal habitats only having been added to the biodiversity unit calculation tool in January 2020

22.6.3.1 DEP and SEP Biodiversity Net Gain Commitment

9. In line with the Dudgeon and Sheringham Shoal Offshore Wind Farm Extensions Scoping Report the Applicant committed to achieve biodiversity net gain:

"... 'biodiversity net gain' will be sought through the mitigation hierarchy for onshore elements so that it can be demonstrated that the Projects are improving biodiversity, in line with new governmental mandate. So far net gain discussions have focussed on onshore project elements only, but these have recently been expanded to consider potential mechanisms in the intertidal zone as well. The Projects will follow these discussions and any new guidance in relation to intertidal and offshore net gain."
10. In the Scoping Opinion PINS stated: *"Biodiversity Net Gain is not embedded in mitigation but sits above it. As such it should not be addressed as a mitigation process but should be informed by the mitigation required. Whilst Biodiversity Net Gain is not mentioned in National Policy Statements EN1 and EN3 the requirement to 'pursue opportunities for securing measurable net gains for biodiversity' is specifically mentioned in the more recently updated NPPF (para 174). Most recently, the Environment Bill 2019 –2020 proposed a requirement for 10% biodiversity net gain and confirmed a mechanism for measuring this using the metric developed by Defra. Although these proposals are not currently enshrined in law, we consider that the principles proposed reflect the spirit of the NPPF requirements and recommend that this methodology is adopted."*

11. Natural England welcomed the commitment and stated that *“A wide range of mitigation and compensation measures will be required for the environmental impacts. At this early stage, we encourage the adoption of a landscape scale approach with a clear vision and coherent strategy of how measures can be delivered across a wider area beyond the compulsory purchase corridor of any route, cannot only provide mitigation and compensation but deliver a net gain for biodiversity and people. To achieve this will mean looking well beyond the footprint of any chosen route. Measures to create new, restore existing and link severed or isolated habitats across the wider area should be incorporated, with the focus on wetland and woodland habitats. This approach should also secure a net gain for biodiversity in line with government policy.”*
12. Although the Government has advised that NSIPs and marine development projects will be brought within the mandatory BNG approach at some point in the future, this exemption is unlikely to enable a ‘business as usual’ approach because the view by which stakeholders view mitigation and compensation will change as the use of BNG becomes more widespread. Furthermore, given the DEP and SEP consenting schedule, and possible time until construction commences, it is possible that BNG will be mandatory for NSIPs and marine developments within the timeframe of the projects. Therefore it is prudent to consider a BNG strategy for offshore in order to ‘futureproof’ DEP and SEP.

22.6.3.2 Permanent versus temporary impacts

13. All potential impacts should be quantified where possible, this includes temporary losses / impacts on habitats. For example, ‘time to target condition’ can be used when using Defra’s biodiversity metric (see below) to account for temporary impacts (CIEEM, 2019).
14. A trial of the latest biodiversity unit calculation tool (Biodiversity Metric 2.0) undertaken by RPS on behalf of RenewableUK (RenewableUK, 2020a) concentrated on use of the tool to assess temporary intertidal habitat loss effects following Natural England advice that temporary effects should also be considered in the BNG calculations. This suggests that Natural England require BNG to be applied where biodiversity impacts are expected to be temporary and short term. In their consultation response to the BNG method for intertidal habitats, RenewableUK questioned if temporary effects, where full recovery of the habitat and communities is expected, should be subject to BNG (RenewableUK, 2020b).

22.6.4 Calculating Biodiversity

22.6.4.1 Biodiversity Metric

15. The original Defra Biodiversity Metric was developed in 2012. The metric was updated to version 2.0 in 2018 and later in December 2019 as a ‘beta test’ version for consultation, to include common green infrastructure features. Shortly after in January 2020 an update including intertidal habitats was released for consultation.

16. The metric uses habitat as a proxy for wider biodiversity with different habitat types scored according to their relative biodiversity value. This value is then adjusted depending on the condition and location of the habitat, to calculate 'biodiversity units' for that specific project or development. The metric can be used to measure both on-site and off-site biodiversity changes for a project or development. The metric also accounts within it for some of the risks associated whenever new habitat is created or existing habitat is enhanced. In calculation terms, the change in biodiversity units is determined by subtracting the number of **pre-intervention** biodiversity units (i.e. those originally existing on-site and off-site) from the number of **post-intervention** units (i.e. those projected to be provided) (Crosher *et al.*, 2019).
17. The biodiversity metric tool allows measuring and accounting for biodiversity losses and gains resulting from development, allowing biodiversity losses to be measured and compensation. The metric allows the biodiversity impact of a development to be quantified so that any offset requirement, and the value of the compensatory action, can be clearly defined.
18. The metric can be used to measure both on-site and off-site biodiversity changes for a project or development. The metric also accounts within it for some of the risks associated whenever new habitat is created or existing habitat is enhanced. In calculation terms, the change in biodiversity units is determined by subtracting the number of pre-intervention biodiversity units (i.e. those originally existing on-site and off-site) from the number of post-intervention units (i.e. those projected to be provided).
19. The key principles for using the metric are as follows (reproduced from Crosher *et al.*, 2019; Natural England, 2019):
 - **The metric does not change the protection afforded to biodiversity.** Existing levels of protection afforded to protected species and to habitats are not affected by the use of this metric.
 - **The metric sits within a decision framework based on the mitigation hierarchy:** it informs decision-making where application of the mitigation hierarchy and good practice principles has concluded that compensation for habitat losses is justified.
 - **The metric is a proxy for biodiversity:** while it is underpinned by ecological evidence the metric is only a proxy for biodiversity and to be of practical use has been kept deliberately simple.
 - **The metric focuses on widespread species and typical habitats:** it is a suitable proxy for widespread species found in typical examples of different habitats. Scarce and protected species are likely to need separate consideration to the biodiversity metric.
 - **The metric recognises the importance of place and connectivity:** it seeks to enhance biodiversity in the locality of impacts so far as possible as well as contributing to England's ecological network by creating more, bigger, better and joined areas for biodiversity.

- **The metric design aims to encourage enhancement, not transformation, of the natural environment.** Where possible, habitat created to compensate for loss of a natural or semi-natural habitat should be of the same broad type (e.g. new woodland to replace lost woodland) unless there is a good ecological reason to do otherwise.
- **The metric informs decisions:** Decisions and management interventions need to take account of expert ecological advice and not just the biodiversity unit outputs of the metric. The historic or landscape significance of a habitat, and relevant planning policies, are also relevant.

22.6.4.1.1 *How biodiversity units are calculated*

20. To measure the biodiversity value of habitats it is first necessary to define the site boundaries and then divide it into appropriate parcels as needed. Parcels are simply distinct portions of each habitat type present. The habitat type and size of these parcels, and the condition of the habitat it contains, should then be recorded. The biodiversity unit value of each habitat parcel is then calculated. To determine the unit value of a habitat parcel we assess its 'quality'. The assessment of quality comprises four components; distinctiveness, condition, strategic significance and connectivity.

22.6.4.1.2 *Habitat definition*

21. Defra Biodiversity Metric v2.0 (Defra, 2020) uses level 4 of the UK Habitats Classification¹ for most habitats. The calculation tool can convert between Phase 1 habitat typologies and UK Habitat Classifications.
22. However, this classification includes only a limited number of habitats for intertidal and marine ecosystems. Instead the European nature information system (EUNIS) has been used to classify intertidal habitats. EUNIS can be used to classify European habitats ranging from natural to artificial, from terrestrial to freshwater and marine. Natural England guidance (Natural England, 2020) states that intertidal habitats should be classified to EUNIS Level 4 which provides the detail needed to separate higher and lower value habitats. Manmade artificial habitats are included in the metric so that they can be distinguished from naturally occurring habitats. Therefore intertidal surveys (and marine surveys should BNG be expanded to include marine habitats) need to characterise and map the extent of habitats to at least EUNIS Level 4.
23. Each habitat is given a value based on its distinctiveness and its area in hectares (ha), before further modifiers relating to habitat condition, strategic significance and connectivity are applied.

22.6.4.1.3 *Distinctiveness*

24. The Biodiversity Metric has five classes of distinctiveness on a scale from Very High (score of 8), High (score 6), Medium (score 4), Low (2) to Very Low (score of 0).

¹ <https://ecountability.co.uk/ukhabworkinggroup-ukhab/> (accessed 31st July 2020)

25. The terrestrial metric assigns distinctiveness bands at broadscale habitat level “based on an assessment of their distinguishing features including consideration of species richness, rarity (at local, regional, national and international scales), and the degree to which a habitat supports species rarely found in other habitats”. In the terrestrial approach the non-natural or semi natural habitats are of medium to very-low distinctiveness depending on how ‘colonised or ‘natural’ they are.
26. All intertidal habitats are scored for distinctiveness at EUNIS level 3 (Natural England, 2020). Natural England considers that that all semi-natural and natural intertidal habitats are of sufficient importance for nature conservation that they require a distinctiveness category of at least ‘high’. Artificial habitats have been included in the metric with a score of ‘low’ (Natural England, 2020).
27. Some natural intertidal habitats, like those on bedrock including peat & clay exposures and chalk, are considered irreplaceable due to their unique origin, low or lack of resilience and limited recoverability from impacts. Peat, clay and chalk exposures are uncommon or of significant international importance adding to the biodiversity interest where they occur. As a result these vulnerable habitats have a distinctiveness score of ‘very high’ for net gain delivery actions but are considered non-tradeable for net gain loss calculations (Natural England, 2020).
28. It is worth noting that in their consultation response to Biodiversity Metric 2.0 (Beta Test), RenewableUK challenged the distinctiveness scoring for intertidal habitats, stating that “Industry find [this] to be quite conservative, as the distinctiveness is “high” for all intertidal habitats, other than artificial habitats. This is regardless of whether they are broadscale habitats which typically host common and widespread species/communities (e.g. some littoral sand habitats) or whether they are very discrete and rare habitats (e.g. littoral biogenic reefs). It appears this will give an overly high weighting to habitats which are not that distinctive” (RenewableUK, 2020b). This was demonstrated by testing the metric using case studies (including cable landfalls) which indicated that even in a scenario whereby a development site is targeted at less sensitive habitats with good recovery potential, there is a considerable expectation on developers for biodiversity offsetting (RenewableUK, 2020a).

22.6.4.1.4 *Condition assessment*

Onshore

29. The Defra Metric v2.0 (Defra, 2020) requires habitat condition to be assessed in accordance with Natural England’s Farm Environment Plan (FEP) Manual 3rd Edition (Natural England, 2010).

30. The FEP Manual (Natural England, 2010) records the habitat and species present as well as the condition of each habitat. This methodology is the same as that followed during the Extended Phase 1 Habitat Survey (JNCC, 2010), however the FEP condition sheets will need to be used to assign a score to each surveyed habitat. Some habitats may be allocated a fixed condition score, and therefore will not require their condition to be assessed. These are usually habitats such as improved grassland or arable fields, where biodiversity is inherently lacking (these will be marked as ‘No assessment required’). If the habitat type recorded differs from the types in the FEP Manual, the surveying ecologist will need to match the habitat to its best equivalent habitat, recording the reasons for why the conclusion was drawn, in line with standard FEP surveying guidance (Natural England, 2010).
31. The following steps form an approach to BNG, where the findings from the habitat condition assessment surveys are used to calculate any net gain or loss of biodiversity:
- A field survey is undertaken to record the existing site conditions for both habitats and species;
 - A calculation is undertaken to identify the amount of existing habitats/species will be retained and/or lost;
 - The existing and proposed site conditions are assigned a biodiversity unit value using the Defra Biodiversity Metric (Defra, 2020). It should be noted that additional biodiversity unit(s) may be added to the proposed site conditions data using off-site compensation or biodiversity credits; and
 - The BNG (or loss) is calculated using the difference between the existing and proposed site conditions data (and is typically expressed as percentage).

Intertidal

32. Natural England’s Technical Guidance for Intertidal Habitats (Natural England, 2020) provides condition tables to assist in the assessment of habitat condition and a score is assigned on the basis of these criteria. These include a habitat description, a series of criteria for assessing the habitat’s condition and the definition of each condition level. Habitat condition is on a scale from Good (3), Fairly Good (2.5), Moderate (2), Fairly Poor (1.5) and Poor (1).

22.6.4.1.5 Strategic significance

33. A score based on whether the location of the development and/ or off-site work has been identified locally as significant for nature. It recognises that there is a risk for biodiversity from a change in location of a habitat (Natural England, 2019). The strategic significance multiplier has a positive effect on the biodiversity unit score, giving extra value to habitats that are located in optimum locations for biodiversity and other environmental objectives. For example, if the area identified is within a Local Policy/Plan Nature Recovery Areas the biodiversity unit value is multiplied by 1.15. If the area is not identified as in a desirable location in local plans or related projects the multiplier is 1.

22.6.4.1.6 *Connectivity*

34. Connectivity is a measure of the functional availability of the habitats needed for a particular species to move through a given area. Examples include the flight lines used by bats to travel between roosts and foraging areas, or the corridors of appropriate habitat needed by some slow-colonising species if they are to spread. There is greater natural connectivity in the intertidal environment related to dispersal through coastal waters. Like strategic significance, the connectivity multiplier has a positive effect on the biodiversity unit score, giving extra value to areas of habitat that are close to or connected to related habitats facilitating flows of species and ecosystem services. Connectivity is on a scale from High, Medium, Low and Not Applicable.

22.6.4.2 *Project biodiversity calculations*

22.6.4.2.1 *Baseline biodiversity calculation*

35. This section of the tool allows you to describe the habitats as they are before the planned development or other intervention takes place.

Biodiversity Units Pre-Intervention = Area x Distinctiveness x Condition x (Strategic Significance x Connectivity)

36. It can include a biodiversity calculation of the area impacted by the development alone or added to a calculation of an area of habitat identified for improvement and compensation.

22.6.4.2.2 *Calculation of post-impact biodiversity*

Biodiversity Units of Proposed Action = Area x Distinctiveness x Condition x (Strategic Significance x Connectivity) x RISKS (Difficulty x Temporal x Location)

37. The calculation of post-impact biodiversity is the same as calculation of the baseline but with additional factors used to describe the risks associated with enhancing or creating a habitat. These are:
- **Spatial risk:** In delivering compensation for habitat loss, the further a habitat is recreated is from the site of the loss, the greater the risk.
 - **Delivery risk:** The level of difficulty involved in creating or restoring habitat.
 - **Temporal risk:** To what extent the timing of compensation delivery could result in a temporary loss of biodiversity. This risk includes the time it takes for a habitat to reach its target condition
38. Again, this will include a biodiversity calculation of the area impacted by the development post-intervention and any area(s) of habitat identified for improvement and compensation, factoring in the biodiversity compensation target to calculate the number of post-intervention biodiversity units (i.e. taking into account the predicted impact of the project plus the effect of any proposed intervention).
39. This can include recovery of biodiversity at the impacted site, the calculation of which is included in the temporal risk (time to recover).

40. Calculation of Biodiversity Net Gain As described previously, BNG will be attained to the required level when the post-intervention units (i.e. taking into account the predicted impact of the project plus the effect of any proposed intervention) are at least 10% higher than the original (pre-intervention) habitat biodiversity units.

Net Gain = Proposed action biodiversity units - Pre-intervention biodiversity units

22.6.5 Biodiversity Net Gain Opportunities

41. This section lists examples of BNG 'measures' to consider that may be applicable to DEP and SEP.

22.6.5.1 Onshore biodiversity net gain opportunities

42. Onshore biodiversity net gain opportunities to consider include:
- woodland planting integrated into wider landscape.
 - creation of woodland rides/woodland edge to provide a structurally diverse, graduated woodland edge with a series of bays/scallops and a natural meander to baffle the wind.
 - planting of tall herbs, scrub and woodland of varying heights to provide mosaic habitat for invertebrates, reptiles, badgers commuting/foraging habitat for bats.
 - retention of removed vegetation (e.g. brash) as deadwood (compatible with wildfire management) for the creation of hibernacula.
 - inclusion of bird (e.g. barn owl) and bat (and other small mammal) boxes / creation of artificial badger setts where required.
 - conservation of veteran trees including pollarding if necessary.
 - Identification of hedgerow improvements (e.g. replanting of gaps), subject to landowner agreement;
 - consideration of planted boundary options taking reference from native hedgerows; and
 - integrated sustainable drainage system, including natural attenuation feature(s) integrated into biodiverse landscape design.

22.6.5.2 Marine and intertidal biodiversity net gain opportunities

43. Many marine and some coastal habitats cannot be recreated and in some cases enhancement will also be difficult. Chalk, peat and clay intertidal and subtidal habitats have been identified as irreplaceable habitats impacts on them and will need to be avoided (Natural England, 2019).
44. Measures that might be expected to improve habitat condition and biodiversity can be considered, even if it is not possible to quantify any gain at this time. Habitat creation in the marine environment is difficult and its success largely unproven in the UK, although creation of mussel bed biogenic reefs has been considered for Norfolk Vanguard. However, measures to improve the condition and biodiversity value of existing habitats are worth consideration. Such measures might include:
- Removal of marine litter, debris and fishing gear;

- Working with EIFCA to manage other activities having a negative impact on marine biodiversity. However, the Cromer Shoal Chalk Beds MCZ is, or soon will be closed to the most intrusive fishing (trawling);
- Removal of existing infrastructure such as the disused telecommunications cable; and
- Improving the condition and possibly the extent of the Zostera (eelgrass) beds, an internationally scarce and declining habitat located in the Wash and North Norfolk Coast SAC. Note that BNG principles state that compensation measures for loss of a habitat should be of the same broad type unless there is a good ecological reason to do otherwise.

22.6.6 DEP and SEP BNG Implementation

22.6.6.1 Terrestrial

45. The DEP and SEP have made a 'voluntary' commitment to achieve BNG for terrestrial habitat impacts.
46. Once the Bill receives Royal Assent will need to ensure monitoring/maintenance of enhancement is secured for at least 30 years after the completion of works (site to be included in the biodiversity gain site register).

22.6.6.2 Intertidal

47. There is now an expectation that BNG will be applied to intertidal habitats down to the mean low water mark for development covered by the Town and Country Planning Act. However, DEP and SEP are exempt because they are NSIPs. BNG is challenging for intertidal habitats because:
 - Re-creation and enhancement are difficult;
 - There appears to be a requirement to achieve BNG even for temporary impacts;
 - Chalk, peat and clay intertidal habitats (which may be present in the landfall corridor) have been identified as irreplaceable habitats impacts on them and will need to be avoided,
 - There is arguably an overly high (distinctiveness) weighting to habitats which are not that distinctive.
48. The DEP and SEP have not made a 'voluntary' commitment to achieve BNG for intertidal or subtidal habitat impacts. Assuming HDD is used there will be no impacts in the intertidal zone. Given the challenges of achieving BNG for intertidal habitats it would be advantageous to avoid project impacts on intertidal habitats, even though there is currently no mandatory requirement to achieve BNG in this context.

22.6.6.3 Subtidal

49. At the time of writing there is no requirement to achieve BNG for fully marine subtidal habitats and the biodiversity metric has not been developed to include them. Furthermore, DEP and SEP are exempt from any requirement on the basis that they are NSIPs. However it is possible that the requirement will change within the project consenting timeframe.

50. BNG in being disused during the monthly meetings with Natural England and relevant ETG meetings.

22.6.7 References

Defra (2020) The Defra Metric v2.0
CIEEM (2019) Biodiversity Net Gain
IAN CROSHER, SUSANNAH GOLD, MAX HEAVER, MATT HEYDON, LAUREN MOORE, STEPHEN PANKS, SARAH SCOTT, DAVE STONE & NICK WHITE (2019). The Biodiversity Metric 2.0: auditing and accounting for biodiversity value. User guide (Beta Version, July 2019). Natural England
JNCC (2010) Extended Phase 1 Habitat Survey
Natural England (2020). Biodiversity Metric 2.0: Technical Guidance for Intertidal Habitats. Natural England Joint Publication JP029. First published January 2020
Natural England (2019). Net Gain for intertidal environments. Overview paper (Draft). Version 3.2. 13 May 2019.
RenewableUK (2020a). Biodiversity Net Gain Note - Trial of Biodiversity Metric 2.0. EOZ9996 Version Rev01. A report by RPS Group. 09 March 2020
RenewableUK (2020b). Response to Net Gain Method for Intertidal Habitats. 28 March 2020.