

Technical Clarification on Biodiversity Net Gain

Dear The Highland Council,

Electricity Act 1989

Town and Country Planning (Scotland) Act 1997

**The Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017**

**Glen Earrach Energy Pumped Storage Hydro (PSH) Project
Technical Clarification THC Ecology Team – September 2025
ECU Ref: ECU00005121**

The Highland Council (THC) Planning Case Officer received an internal consultation response from THC Ecology Team on 18 August 2025. It is noted that the consultation response includes a holding objection to the Proposed Development on the grounds of *“Biodiversity Enhancement – clarity on some aspects of calculation of biodiversity units and on the grounds of confidence of peatland enhancement being delivered.”*

The Applicant recently responded to the Planning Case Officer regarding the above via email of 27 August. The email correspondence providing technical clarification relevant to the following points:

- Peatland ecology and enhancement (confidential offsite peatland restoration proposal); and
- A response to wider ecology comments noting the Applicant is committed to completing further survey work prior to commencement of works in line with the Energy Consents Unit (ECU) standard ‘prior to commencement ecology survey conditions’.

Further to the above, this document provides technical clarification regarding the THC Ecology Team query as follows:

THC Ecology Team stated that "Further detail is required in order to fully assess whether the enhancement is sufficient to satisfy NPF4 Policy 3 and Highland Council Guidance" and specifically raised three matters regarding biodiversity enhancement:

1. Metric Selection THC Ecology Team noted: *"The Highland Council Biodiversity Enhancement Planning Guidance recommends the use of the DEFRA metric to demonstrate biodiversity values, we note that the SSER Toolkit has been used to calculate the Biodiversity Units."*

2. Baseline Biodiversity Unit Calculations for Offsite Areas THC Ecology Team stated: *"It is unclear from the submitted information, if the proposed areas outwith the proposed development area (broadleaved tree planting areas) have been included in the baseline biodiversity unit calculations. It is expected that any areas proposed for delivering enhancement are fully assessed in terms of ecological value. The value of the existing offsite habitats (and species) must be included in any calculations."*

3. Enhancement vs Creation Classification THC Ecology Team stated: *"Furthermore, we do not agree with the proposal that the native woodland is considered enhancement of the existing heathland, as although it is the intention to keep the heathland as the ground flora, the structural and ecological function would shift significantly and therefore we would consider this as creation of a woodland, which would have implications on the current calculations of biodiversity units."*

This document provides technical clarification below in response to this query.

1. Metric Selection

At the time of preparing the EIAR, there was no formal guidance in Scotland from NatureScot¹ to advise on how to undertake a quantitative BNG assessment as part of the planning process for infrastructure developments. However, on 20 September 2023, Scottish Government published an independent research report (McVittie, A., Cole, L., McCarthy, J., Fisher, H, and Rudman, H. (2023) Research into Approaches to Measuring Biodiversity in Scotland, Final Report to Scottish Government) which supports the development of a Scottish metric for measuring biodiversity, to allow for consistent and comparable assessment of losses or gains in biodiversity.

NatureScot was instructed by Scottish Government to commence work on developing a biodiversity metric that will be suitable for use in supporting the delivery of the Biodiversity (Policy 3) and Natural Places (Policy 4) policies in National Planning Framework 4² (NPF4), which, respectively, contain the following statements of policy intent: "To protect biodiversity, reverse biodiversity loss, deliver positive effects from development and strengthen nature networks" and "To protect, restore and enhance natural assets making best use of nature-based solutions". NPF4 also states that major development will only be supported where nature networks "are in a demonstrably better state than without intervention" using best practice and including future monitoring and management where appropriate.

With regards major, national and Environmental Impact Assessment development, The Highland Council (2024) Biodiversity Enhancement Planning Guidance (online) states at section 4.40 *"Until a Scottish metric is available, applicants may wish to use*

¹ NatureScot, 2025 [Developing with Nature guidance | NatureScot](#)

² Scottish Government, 2023 [Introduction - Biodiversity: draft planning guidance - gov.scot](#)

an alternative metric, adapt or amend England's Statutory metric or utilise a different methodology. Where these or other alternative approaches have been taken the rationale must be clearly justified and set out in a supporting statement."

The 'Biodiversity: draft planning guidance' published by the Scottish Government on 30 November 2023 states that in the absence of a universally adopted Scottish methodology/tool 'a flexible approach will be required'.

In the absence of a formal requirement for Biodiversity Net Gain (BNG) assessment in Scotland, the Scottish and Southern Energy Renewables (SSER) Biodiversity Toolkit ('SSER Toolkit') has been utilised to provide a metric for BNG assessment for the Proposed Development. The SSER Toolkit has been utilised on projects across Scotland and is considered more effective in a Scottish context, with allowance for greater use of professional judgement to better cater for extensive upland environments in Scotland. It was agreed prior to the application with NatureScot that the SSER Toolkit would be used.

2. Baseline Biodiversity Unit Calculations for Offsite Areas

Habitat Surveys and Data Sources

Some of the areas identified for enhancement fall outside of the large area subject to detailed baseline habitat survey. For these areas, the baseline habitat information is derived from desk-based information and existing knowledge rather than field surveys. This limitation is acknowledged in Section 2.4 of EIAR **Appendix 7.5: Biodiversity Net Gain**.

However, as also stated in Section 2.4, desk-based sources were used to identify likely locations of blanket bog outside the detailed survey area. Any such likely blanket bog zones have been excluded from planting, as have areas of existing planting.

Habitat Assumptions

The terrain and habitat outside the detailed survey area are similar to those within it. Therefore, habitat not excluded from planting, but beyond the detailed survey area, has been assumed to be upland heathland in the same condition as the majority of upland heathland within the detailed survey area. This assumption is considered to be robust, given the ubiquity of upland heathland, and specifically wet heath, which is the dominant habitat outside of blanket bog zones on open moorland in this region.

Therefore, the majority of planting zones outside the detailed survey area are likely suitable for planting, and it is unlikely that these areas have been undervalued.

Ground-Checks and Planting Design

Notwithstanding the above assumptions, ground-checks will be carried out before planting to ensure that unsuitable habitats remain unplanted. This includes:

- Pockets of blanket bog not identified by the desk studies; and
- Acid or base-rich flushes occasionally found within upland heathland.

Noting that woodland condition criteria do include a requirement for openings, glades, and clearings, leaving small habitat patches unplanted will not detract from woodland provision. Instead, they will help create a more natural woodland structure and promote green networks. The provision of such clearings, in combination with the intention to thin the density of planted woodland in an uphill direction, would also provide a more naturalistic woodland.

In some cases, larger areas may be found unsuitable for planting. However, with an estimated 22% net gain, there is enough flexibility to allow for some reduction in planting while still easily achieving the target of 10% net gain.

Overall, this approach is considered reasonable and proportionate given the scale of proposed enhancements.

3. Enhancement vs Creation Classification

Planting of Native Woodland on Upland Heath

Planting open native woodland on upland heath (mainly wet heath) will still retain many heathland plant species. The intended woodland types—primarily NVC W17, occasionally W18 with Scots pine—often naturally occur as ‘trees on heathland.’ This is in fact the case for much of the existing ancient woodland beside the River Coiltie.

Whilst NatureScot's "Developing with Nature" guidance is primarily directed at local development, its principles are relevant to this approach. The guidance confirms that biodiversity measures can serve both mitigation and enhancement purposes, stating that "it is only when these measures result in biodiversity being left in a better state than before development that nature is enhanced and positive effects for biodiversity have been secured." The guidance emphasises that measures should be "locally and ecologically relevant" and consider how they "complement, substitute for or restore lost, degraded or disturbed habitats." These principles support treating native woodland establishment as enhancement of existing heathland systems, particularly where the woodland types reflect natural Scottish upland conditions and retain characteristic heathland flora.

For this reason, the planting is therefore considered an enhancement in the biodiversity metric. This approach also aligns with NatureScot guidance, which

advises that biodiversity metrics in Scotland should reflect Scottish-specific ecological conditions.

Metric Limitations

If this planting were treated purely as woodland creation in the metric (instead of enhancement of the existing upland heathland), the result would incorrectly show a reduction in biodiversity units. This would ignore ecological gains and suggest no positive outcome, which is an illogical conclusion given the ecological reality.

Scotland's uplands currently have far more heathland and far less native woodland than would exist under natural conditions. Planting native woodland on heathland, where appropriate, is widely encouraged and is already part of rewilding projects.

Examples include:

- Trees for Life projects nearby, where heathland has been planted with native woodland; and
- Areas of heathland within the Balmacaan Estate, where native woodland generation is underway.

Until NatureScot develops a new Scottish-specific metric, treating the planting of native woodland on upland heathland as enhancement remains the only practical way to achieve a fair and accurate outcome.

Conclusion

This clarification addresses the three specific concerns raised by THC Ecology Team: justification for using the SSER Toolkit over the DEFRA metric given current Scottish policy flexibility; demonstration that offsite enhancement areas have been appropriately assessed through desk-based analysis with ground-verification protocols; and ecological rationale for treating native woodland establishment as enhancement rather than creation of existing heathland systems.

The outline Landscape and Ecological Management Plan (**oLEMP (Appendix 6.4, Volume 5)**) outlines measures to conserve, restore, and enhance biodiversity, including nature networks. The final LEMP will be developed in consultation with relevant stakeholders post-consent, and prior to the commencement of the Construction phase.

The methodology for biodiversity enhancement calculation fulfils NPF4 Policy 3 requirements. From an ecological perspective, naturalistic planting of trees on upland heath represents a clear improvement for biodiversity and aligns with established woodland policy and rewilding objectives.