

Mr A Walker  
Development Manager Team Leader  
Wiltshire Council

Nina Garner  
Environmental and Planning Specialist  
National Grid

15 February 2024

**Planning Reference: PL/2022/09258**

SENT VIA EMAIL

Dear Mr Walker,

**RE: Biodiversity Net Gain for Full Planning Application: Proposed Works at Minety Substation, Minety, Wiltshire, SN16 9DX.**

### Project Background and Needs Case

The Minety development proposal comprises of an extension of the existing substation comprising installation of 400/132kV 240MVA SuperGrid Transformer, 3 number 400/33kV 150MVA SuperGrid Transformers, circuit breakers, construction of retaining wall and 33kV switch room, formation of access road, culverting of watercourse, erection of fencing and associated works.

National Grid has a statutory duty to offer a customer a connection and to be economic and efficient in developing and operating the transmission system whilst also having regard to the preservation of amenity when developing the network. In developing the scheme at Minety, National Grid has sought to balance these requirements and meet its statutory duties.

The works are required to;

- facilitate connection of nine customers that will provide 450MVA of battery energy storage system (BESS) and solar generation to the grid system,
- achieve greater reliability of the existing substation to enable the increase in embedded generation within the local Distribution Network Operator (DNO), Southern Electric Power Distribution plc (SEPD).
- 240MVA of additional capacity for the DNO to enable meet increased energy demand from businesses and consumers in the wider region.
- All these aspects will enable the decarbonisation of the electricity supply network.

The background "Needs Case" for the development is set out in more detail in the report attached with this letter.

### National Grid's Biodiversity Net Gain Commitments

National Grid have an internal policy, underpinned by a formal and adopted business procedure, to deliver a minimum target of 10% biodiversity net gain on all schemes. To ensure National Grid fulfil these obligations, net gain commitments and evidence (including ecological surveys, BNG reports etc.) are reported to the regulator, Ofgem.

During project development ecological surveys and a BNG assessment were undertaken in line with best practice. Following comments received from the Council's Ecologist in March 2023, National Grid commissioned additional ecological surveys and an updated BNG report which was then submitted to the Council on 11 July 2023, along with a Habitat Creation Strategy. These documents outline National Grid's approach to BNG at the existing Minety substation site.

Due to the site constraints, including existing electrical infrastructure, ancient woodland and surrounding approved planning applications, resulting in limited available land, it is not feasible to achieve no net loss or deliver 10% net gain within our own land ownership at the site. Therefore, in order to deliver our BNG commitments, we have recognised that a combination of onsite and off-site compensation would be required to achieve 10% net gain (see onsite strategy in Figure 1 below).

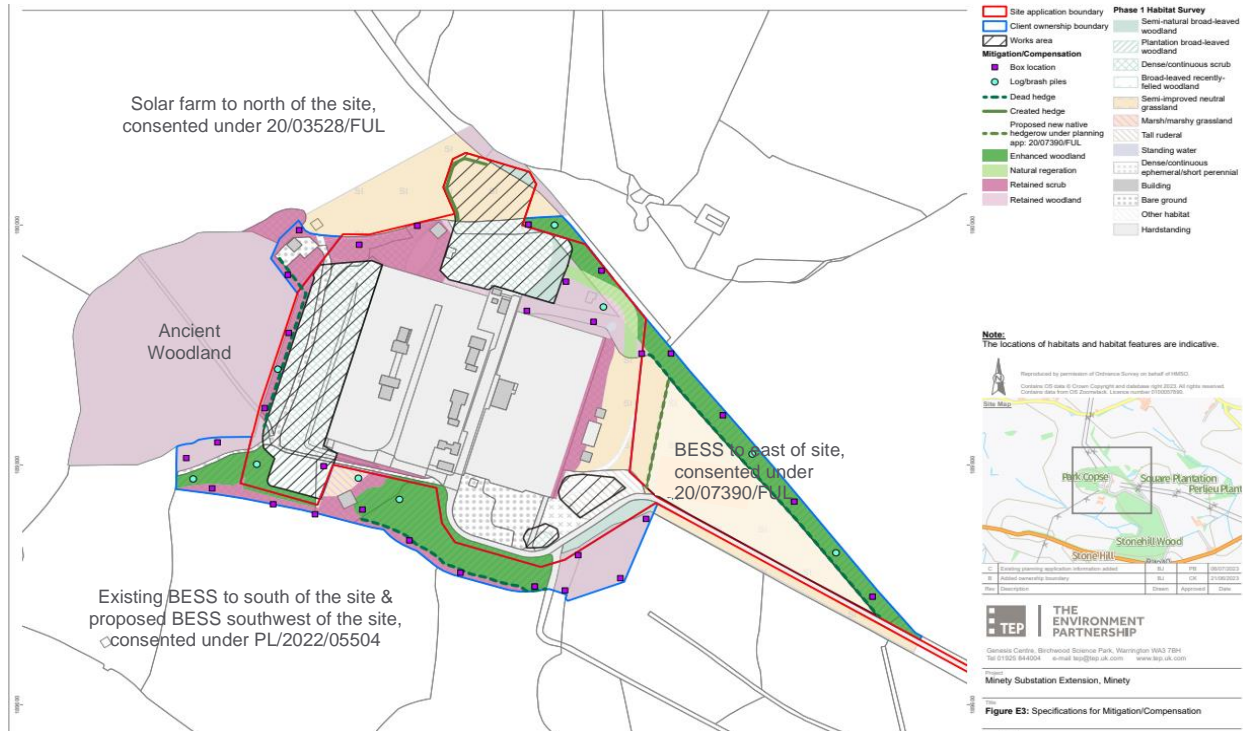


Figure 1. Onsite compensation strategy, extracted from the Habitat Creation Strategy submitted to the Council on 11 July.

Whilst we appreciate that offsite compensation is viewed as a last resort, Core Policy 50 of the Wiltshire Core Strategy does recognise that, offsite compensation “*will be necessary in some instances where other approaches cannot guarantee no net less and avoidable losses are outweighed by other sustainability considerations*”.

National Grid have explored alternative options and have had ongoing BNG discussions with local delivery partners including the Wildlife Trust, Environment Bank, Bristol Avon Catchment Market and the Council to explore options for offsite net gain, however none of these had available the type of Biodiversity Units required. See Appendix A – D for correspondence. As a result, National Grid have agreed to make a financial contribution to Wiltshire Council for securing of biodiversity net gain within Wiltshire, subject to completion of a legal agreement.

I hope the above is helpful in clarifying the position and will enable the Council to proceed to consider NGET’s application at the next committee. Should you require any further information, I am happy to arrange a call.

Yours sincerely

Nina Garner

**Environmental and Planning Specialist (Consents)**

**National Grid**

## Appendix A – Environment Bank Correspondence

**From:** [Helen Wyman](#)  
**To:** [Christopher Plester](#); [BNGSales](#)  
**Subject:** RE: [EXTERNAL] RE: BNG Unit requirements - Minety - Wiltshire  
**Date:** 27 February 2023 17:58:17

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Hi Chris

Thank you, we have just been through all our current sites in detail, and unfortunately, the site we have in that area, the units are all reserved. We are actively looking for another site; however, I don't think that will work with your timescales.

I'm sorry we can't provide you with a solution for this site. However this will become less and less as more sites come online.

Any questions, you know where I am.

Thank you

Helen

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**From:** Plester, Chris [REDACTED]  
**Sent:** Monday, February 27, 2023 3:24 PM  
**To:** Helen Wyman [REDACTED]; [BNGSales](#)  
[REDACTED]  
**Subject:** RE: [EXTERNAL] RE: BNG Unit requirements - Minety - Wiltshire

Hi Helen

Wiltshire Council is the LPA in this area - we are considering a range of options at the moment neighbouring LPA/NCA could be considered but this would up our unit requirements quite significantly

Regards

Chris

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**From:** Helen Wyman [REDACTED]  
**Sent:** 27 February 2023 14:49  
**To:** Plester, Chris [REDACTED]; [BNGSales](#)  
[REDACTED]  
**Subject:** [EXTERNAL] RE: BNG Unit requirements - Minety - Wiltshire

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email is malicious, please use the 'Report Phish' button.

Hi Chris

Thank you very much for your email.

Can I ask you to confirm the LPA for these units? Also if we do not have anything within the LPA, is neighbouring LPA/NCA of interest?

Thank you

Helen

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**From:** Plester, Chris [REDACTED]  
**Sent:** Monday, February 27, 2023 12:53 PM  
**To:** BNGSales [REDACTED]  
**Cc:** Helen Wyman [REDACTED]  
**Subject:** BNG Unit requirements - Minety - Wiltshire  
**Importance:** High

Good afternoon

Following discussions with Helen regarding National Grids commitment to enhance the Natural Environment and the potential opportunities to work with the Environment bank including the provision of BNG units via your network of offset sites.

National Grid are planning a construction project at our Electricity Substation in Minety – as a result this construction activity we will be having a permanent impact on some Medium distinctiveness woodland and scrub habitats around the substation.

There is limited space available on site to fully mitigate and deliver 10% BNG and meet our Corporate Net Gain commitments of 15% therefore are looking to identify opportunities offsite for the provision of BNG units in close proximity to our site.

Please could you advise on the potential availability of ~ 15 (Medium Distinctiveness) Biodiversity units – Ideally a mix of woodland and scrub units.

Timescales are very tight for this development so would appreciate an indication of readiness so we can put suitable arrangements in place, or seek alternatives asap

If you require further information at this time please get in touch

Many thanks

Chris

## Appendix B – Wiltshire Wildlife Trust

**From:** Lucy Bates <[REDACTED]>

**Sent:** 28 February 2023 09:27

**To:** Hales, Mike [REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** [EXTERNAL] RE: Minety Substation Development - Biodiversity net gain requirements

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Hi Mike.

Following your enquiry to Wiltshire Wildlife Trust concerning Biodiversity Unit sales, I can confirm that we don't have any units for direct sale from Trust projects quite yet. It could be good timing though to put you in touch with my colleagues in the Bristol Avon Catchment Market.

Over the past 18 months, the BACM has developed a pipeline of supply from nature-based projects across the catchment area, including high integrity Biodiversity Units which may be appropriate to meet regulatory planning requirements for the projects you are working on in Wiltshire. Wiltshire Wildlife Trust are one of three collaborating organisations developing this pilot platform.

You can have a read about the BACM on their [webpage here](#).

The Buyer Registration phase of the project is due to open soon, so as you still have a Biodiversity Unit requirement to discuss, please directly email [REDACTED]. More information will also be available at a buyer webinar.

I hope this is of use- do stay in touch with us directly too as future projects develop.

Best meanwhile,

**Lucy**

**Lucy Bates (MSc, MBPR (FACTS, Env. Reg.))**

**Nature Recovery Champion**  
[REDACTED]

Wiltshire Wildlife Trust | Elm Tree Court | Long Street | Devizes | Wiltshire | SN10 1NJ

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**From:** Hales, Mike [REDACTED]  
**Sent:** 27 February 2023 17:09  
**To:** Lucy Bates [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [EXTERNAL] Minety Substation Development - Biodiversity net gain requirements

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Lucy,

Hi,

When we last discussed the Minety Substation development, you were going to consider whether WWT would be in a position to offer some of the BNG units we require to offset our works at site. We are hopefully going to enter into agreements with other providers soon, however we would be keen to consider some local offsetting if it is available.

Please could you advise if WWT have developed their position since we last talked.

I'm happy to arrange a call to discuss if you think that would be beneficial.

Regards,

Mike Hales  
Connection Engineer  
Customer Connections  
nationalgrid

[REDACTED]

Advance notice of holidays:

## Appendix C – Bristol and Avon Catchment Market

**From:** [Amy Coulthard](#)  
**To:** [Christopher Plester](#)  
**Cc:** [Mike Hales](#); [Senior, Edward](#)  
**Subject:** [EXTERNAL] RE: URGENT: National Grid BACM - Planning Permission  
**Date:** 11 April 2023 19:10:47  
**Attachments:** [image001.png](#)

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Dear Chris

Thank you for making the time to speak with me this evening and for your time and interest in securing Biodiversity Gain Units from the Bristol Avon Catchment Market.

As we discussed this evening, EnTrade have been reviewing all the requirements for buyers interested in registering as participants in the Bristol Avon Catchment Market and it is with regret that we will be unable to meet your needs at this time.

Your Credit requirements have been reviewed by the Bristol Avon Catchment Market Board and the Minety development does not meet our Ethical Buyer requirements for the following reasons:

- The development includes a proposed loss of 0.014ha lowland deciduous woodland which is a high distinctiveness habitat. In the Arboricultural Impact Assessment Report reviewed by the Catchment Market Team, this habitat type is listed as an 'irreplaceable habitat'; in the absence of Defra's recognised irreplaceable habitat list, this must be considered as high value and of ecological importance.
- The assessment also identified that the proposals are not currently fully compliant with Wiltshire Council Policy relating to trees and woodland, for example Policy NE14 states permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features.
- The metric calculation provided also contains an error in the Assessors comments section in reference to the loss of the Lowland Deciduous Woodland which would need clarification

The Board acknowledge that there are measures in place to avoid and mitigate damage, however there remain aspects of the Minety development that require further consideration by National Grid before the Bristol Avon Catchment Market Ethical Buyer requirements can be met. The key requirements for buyers of Biodiversity Units are:

Buyers that are in the market for biodiversity gain or nutrient mitigation credits to offset development impacts should:

- demonstrate that proposals are in an adopted or proposed Local Plan, or approved by the LPA, or pending approval subject to nutrient mitigation and biodiversity gain requirements that can be appropriately met through the Bristol Avon Catchment Market;
- demonstrate development will not result in the loss of irreplaceable habitat such

as ancient woodland;

- confirm development is not resulting in the direct loss of land designated specifically for the purposes of nature conservation e.g. Site of Special Scientific Interest (SSSI).

Should you be able to provide evidence of changes to your proposals that address these issues we would be happy to reconsider your credit needs in future Market Rounds.

Please contact me if you would like any further information.

Kind regards  
Amy



Amy Coulthard, Director of Operations

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**From:** Plester, Chris [REDACTED]  
**Sent:** 11 April 2023 09:07  
**To:** Amy Coulthard [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** URGENT: National Grid BACM - Planning Permission  
**Importance:** High

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognise the sender and know the content is safe.

Hi Amy

With the registration window closing later this this week , we could do with some advice and guidance around the questions raised below regarding planning permissions and payment processes.

Any insights would be appreciated

Regards

Chris

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**From:** Plester, Chris  
**Sent:** 05 April 2023 13:49  
**To:** Amy Coulthard [REDACTED]



**Subject:** FW: National Grid BACM - Planning Permission

**Importance:** High

Hi Amy

Are you able to advise on this question regarding planning permission?

Any help would be appreciated

Thanks

Chris

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**From:** Plester, Chris

**Sent:** 28 March 2023 16:08

**To:** Amy Coulthard [REDACTED]

**Subject:** National Grid BACM - Planning Permission

**Importance:** High

Hi Amy

Following the Webinar earlier this week we have been reflecting on what we need to do and when to participate in the Market.

There is some concern about how the market works in parallel with our planning submission and hopefully our subsequent approval. In Nov 2022 we submitted our planning application to the LPA, and are still awaiting a determination, however this is unlikely to happen before Easter and the opening of the market etc.

If we commit to participate in the market, make a bid, and get a settlement - and then fail to get planning permission, are we then duty bound to pay in full for the habitat units agreed in the settlement?

It would be good to understand in more detail how this scenario may play out,

Any clarity would be appreciated as soon as possible

Regards

Chris

**Chris Plester** (*Pronouns: he/him*)

Sustainability Technical Lead

Safety, Risk & Compliance (SRC)

**nationalgrid**

[REDACTED]  
[REDACTED]