

BNG in Practice

Dominic Woodfield



Quantifying the unquantifiable

- In order to understand whether BNG is delivered by land-use changes, biodiversity needs to be measured and quantified.
- An ecosystem, being the complex interaction of potentially millions of biotic and abiotic factors, does not lend itself readily to this.
- Ecological impact assessment has traditionally been the preserve of educated guesswork and no small amount of gut feeling.
- In the context of planning decisions, this does not lend itself to repeatability, consistency and transparency.

Enter the Metric!

- ❑ Biodiversity metrics first formally used in UK around a decade ago and have become more and more influential in development design and planning decisions since that time.
- ❑ 2019: Environment Bill proposes delivery of 10% net gain as a mandatory requirement of development.
- ❑ This underlined the need for standardisation. The release of the Beta Test 'Metric 2.0' in July 2019 together with the progress of the Environment Bill towards law, saw a further acceleration of uptake.
- ❑ Metric 3.0 published July 2021 and now expected to be the system used by developers and planning authorities going forward to measure compliance with both policies and future legislation requiring the delivery of net gain in biodiversity.

HOW IT WORKS:



A-1 Site Habitat Baseline

Condense / Show Columns

Condense / Show Rows

Main Menu

Instructions

Ref	Habitats and areas			Distinctiveness		Condition		Ecological baseline
	Broad habitat	Habitat type	Area (hectares)	Distinctiveness	Score	Condition	Score	Total habitat units
1	Grassland	Modified grassland	5	Low	2	Poor	1	10.00
2	Woodland and forest	Other woodland; broadleaved	2	Medium	4	Moderate	2	16.00
3								
4								
5								
6								
7								
8								
9								
10								
11			7.00					26.00

HOW IT WORKS:



A-2 Site Habitat Creation

Condense / Show Columns

Condense / Show Rows

Main Menu

Instructions

Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness		Condition		Habitat units delivered	
			Distinctiveness	Score	Condition	Score		
Urban	Developed land; sealed surface	2.5	V.Low	0	N/A - Other	0	0.00	
Urban	Vegetated garden	2	Low	2	Poor	1	3.86	
Urban	Allotments	0.5	Low	2	Good	3	2.90	
Total area		5.00					Total Units	6.76

Headline Results

Return to results menu

Oops!

On-site baseline	<i>Habitat units</i>	26.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00

On-site post-intervention <small>(including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	22.76
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00

On-site net % change <small>(including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-12.48%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%

Off-site baseline	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00

Off-site post-intervention <small>(including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00

Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-3.25
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00

Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-12.48%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%

Trading rules Satisfied?	No - Check Trading Summary
--------------------------	----------------------------

Options

Sacrifice on-site



Compensate off-site



On-site delivery of BNG



Offsite approaches



Delivery mechanisms

NOW....

- Planning conditions (on-site)
- S106 agreements
- Independent legal agreements
- CIL
- Habitat banking initiatives

AFTER EB BECOMES LAW....

- Conservation Covenants
- Planning conditions?
- Independent agreements?
- S106?
- CIL?
- Habitat banking initiatives?

Issues for LPAs and developers

- Will the supply be there to meet a rush of demand?
- Is there enough land relative to housing need?
- Will this drive up agricultural land prices?
- Where supply is short, driving up the purchase price of conservation credits/biodiversity units.
- Ownership/lease models.
- Monitoring who will pay/enforce?
- Competition between offset sites and other land uses.
- Land banking risk in housing stressed areas?
- Ransom risk?
- LPA resourcing – £9.5m/yr

Issues for landowners

- Potentially bound in for 30+ years.
- What happens then?
- How does this affect rural payments / agri-environment grant eligibility?
- Will I be able to return the land to farming?
- What happens if my land is designated?
- Land banking opportunity in housing stressed areas?
- Habitat banking systems – problems with delay.

And what about us?!



Low value/high value?



Ranscombe Farm



- Site of Special Scientific Interest
- IPA (Important Plant Area)
- Plantlife Reserve
- Nationally rare species
- Legally protected plant species
- BUT.....
- Very low score on BNG Metric!

Thoughts to take away

- Mandatory 10% net gain looks good on paper, and it could be a game changer, but who's measuring, and who's checking the measurements?
- The statutory and policy framework cannot be relied upon to ensure that weight placed on ecological resources in decision making is always proportionate to their actual importance.
- The Environment Bill doesn't suddenly change that and nor does the use of metrics.
- Being cognisant of these problems helps to ensure that development designs and planning decisions have the best chance of securing BNG in reality, not just 'on paper'.
- Do not assume that metrics, statutory bodies or *even experts!!* always have the right answer.
- Don't be afraid to get that second or third opinion! Stay sceptical!

Thank you

