

# Biodiversity Net Gain – Webinar

Monday 6<sup>th</sup> September 2021



Scottish  
Environment  
LINK

## Purpose of the event

This event was organised for LINK members to learn more about why Biodiversity Net Gain (BNG) is important and how it contributes to an overarching nature positive framework. This webinar was an opportunity for members to gain understanding of how BNG relates to current LINK work.

## Event format

10.00 – 10.10	Welcome, introduction and context setting from <b>Deborah Long (Chief Officer, LINK)</b>
10.10 – 10.30	<b>Presentations:</b> <b>Jason Reeves (Head of Policy and Communications, CIEEM) and Hannah Williams (Principal Ecologist, WSP)</b> – Biodiversity Net Gain and Environmental Net Gain principles <b>Charlie Nathan (Head of Planning and Development, RSPB Scotland)</b> – Scottish Climate and Nature Network: a national plan for nature that can help deliver a nature positive future.
10.30 – 10.55	Discussion with audience
10.55 – 11.00	Closing remarks from Deborah Long

## Welcome and introduction

Deborah Long, Scottish Environment LINK's Chief Officer, welcomed everyone to the event.

The [Global Biodiversity Outlook Report 5](#) says '*Biodiversity is declining at an unprecedented rate, and the pressures driving this decline are intensifying*'. There is clearly a need to see urgent action to tackle ongoing changes that are gathering pace, for example the world population trends, carbon in the atmosphere trends, and remaining wilderness trends. The sense of urgency around biodiversity loss and restoration is significant now. The need to act as well as have the policies in place is overwhelming.

Deborah highlighted the 'bending the curve of biodiversity' graph in the Global Outlook 5 report. What we need to do to change the direction and restore biodiversity is deliver actions on the ground: reduce consumption, sustainable production, reducing other drivers, climate change action and conservation restoration.

The presentations will be discussing the following buzz words, biodiversity net gain, and nature networks.

## Presentations:

You can find the speaker's presentation slides [here](#).

**Hannah Williams, Principal Ecologist WSP**, discussed biodiversity net gain (BNG) and how it is a building block of environmental net gain (ENG). BNG is a process that can be used for development or land use change, that leaves biodiversity in a better state than it was before. We need to put back more than what we lose.

BNG has arisen internationally. It originates out of the [Business and Biodiversity Offsets Programme](#) (BBOP) which is a collaboration of about 70 companies, financial institutions, government agencies and civil society organisations. The aim was to get businesses to try and conserve biodiversity that was effective but also economically efficient. CIRIA, CIEEM & IEMA produced [principles](#) which the UK has now drawn on. These principles are critical to how BNG gets implemented.

BNG is based on having metrics that enable the measurement of biodiversity before the action commences and then again afterwards. There are concerns about doing ‘biodiversity by numbers’ however the principles provide a framework in which this is discentivised.

Legislation is being developed in Scotland: the [NPF4 consultation analysis](#) published in July 2021 includes securing positive effects for biodiversity but it does not explicitly say BNG. However, BNG would be considered a tool to demonstrate positive effects of biodiversity. In England, the Environment Bill is going through parliament which is anticipated to receive royal assent later this year/early next year. It will require all development to achieve BNG and a net gain of 10%. Internationally, the draft post-2020 framework suggests a milestone of a 5% net gain, and defines net gain in terms of increased areas, connectivity, and ecological integrity.

**Jason Reeves, Head of Policy and Communications, CIEEM.**

There is no single definition for environmental net gain. In Defra’s 2018 consultation on Biodiversity Net Gain (BNG) it was defined as: *“In short, this means improving all aspects of environmental quality through a scheme or project. Achieving environmental net gain means achieving biodiversity net gain first and going further to achieve increases in the capacity of affected natural capital to deliver ecosystem services and make a scheme’s wider impacts on natural capital positive.”*

In England, ENG is referenced in DEFRA’s 25-year environment plan, but BNG is not. However, BNG is referenced in the Environment Bill. Natural England is developing an Environmental Benefits Networks tool –the table in the slide shows an indication of where they are and the different benefits that it measures. The difference with ENG is qualitative. It is indicative of whether something is improving (increasing/decreasing) and the levels of confidence in that.

In Wales, this approach is being incorporated to their overall delivery of the Environment Act but there is not a specific element of BNG incorporated into the planning aspects. Not aware of this as a specific element in Scotland and NI.

There is no legal mandate for ENG, but it is being delivered. BNG will come in from the Environment Bill but there is nothing currently similar for Scotland and NI. It is already being delivered in multiple ways without a label being put on it – e.g., delivery of natural capital and ecosystem services. The element of this is it should form the part of a decision-making tool and deciding on enhancements and benefits.

There are some risks and concerns with ENG.

1. Terminology - it is easy to confuse BNG & ENG as well as the different terms used in each country within the UK.

2. Skills and resources - as ecologists, do we have the right skills to deliver this? It takes us outside of the usual nature conservation areas. Do planning authorities have resources? CIEEM have produced a [briefing paper](#) for local authorities in Scotland to help them understand BNG.
3. Trade-offs and how decision making is done: there is a concern that once something has a numerical value, some people would see it as something you can change into a monetary value. BNG & ENG are proxies and blunt tools. We need expert input into them.
4. Joined up thinking is a concern but also an opportunity.
5. Stacking and bundling is an idea if you have a piece of land, can you manage it for carbon credits as well as for BNG?

Opportunities with ENG:

1. Multi-disciplinary approach and getting other sectors is good for nature conservation.
2. Long term management and long-term maintenance: the chances of continuity increase if other sectors are involved.

### **Charlie Nathan, Head of Planning and Development, RSPB Scotland**

In addressing the twin crises in climate and nature, we need to embed nature in everything. We must act with urgency in addressing biodiversity loss and secure what nature can offer both in terms of climate mitigation and adaptation.

Increasing the resilience of places by making space for nature is not a new concept, with innovation happening now. There is however a need for it to become mainstream. We can point to examples of integrating nature into and onto development activities within Scotland and the UK and around the world.

We can also point to a raft of policies, strategies and targets that contribute toward achieving the COP26 goals - a useful frame for these discussions. These include achieving net zero, adapting and protecting communities and natural habitats and mobilising finance to support these activities, moving investment away from high carbon and high impact activities. The [Infrastructure Investment plan](#) for Scotland has recently been agreed and now embeds natural infrastructure within its definition. Our peatland restoration targets and natural flood risk management strategies across Scotland are examples of the types of things that are happening now all. We also have the pilot Rural Land Use Partnerships that are looking to make the most out of our land in a sustainable manner. However, it is with the fourth COP26 goal that more work is needed across national, and local governments and the full range of sectors. The need to collaborate and establish partnerships, aligning the shared ambitions and targets that seek to respond to the climate and biodiversity crises.

The Scottish Nature Network concept, a key ask of LINK and its members in the forthcoming National Planning Framework 4, is one element that could act as the glue to all the strategies and targets mentioned above. [Click here to watch RSPB's video on Nature Networks. Add link to LINK's film on it too.](#)

LINK is advocating for a Scottish Nature Network to be included in NPF4, as a National Development. The network offers a locus for discussions to happen, to identify the areas that could contribute to the network and help channel the means for implementing habitat restoration and creation in a strategic manner. We need decision makers to be looking through a nature/climate lens and a Nature Network can help realise this.

[Click here](#) to see a planners guide suggesting how the nature network could be adopted within the planning system.

## Panel Discussion: Q&A

### **Suzie Saunders, Woodland Trust Scotland**

**Q:** Through BNG is there a requirement for like for like replacements? For example, if you lost a calcareous grassland, would you have to replace it with the same habitat that was lost or through a scoring system where you can replace it with something which is thought to have a similar benefit to biodiversity.

*Hannah commented that there is a particular requirement to replace like for like in England. She noted that there isn't one in Scotland. There are only a few habitats classified as low biodiversity value, e.g., arable crops. Most habitats do need to be replaced like for like or enhanced.*

### **Diarmid Hearn, National Trust for Scotland**

**Q:** Question regarding quality. Referring to tree cover for example. How does the metrics factor the quality of something that has been untouched to something that has been recently planted?

Hannah noted that the way that metric works is by considering certain inherent qualities such as habitat types. It is recognised that certain habitat types would be harder to replace if you were to lose them than others. There is a label called distinctiveness e.g., woodland and peatlands are harder to replace than certain other habitats. Another factor which adds to how quality is considered is the condition of habitats. The habitat type's inherent quality and how good the habitat is. e.g., native pinewood but the condition isn't as good as it could be, e.g., the ground layer is underdeveloped. You assess that before and after the development. If the habitat is of high quality as the beginning, and it is enhanced through BNG requirements, then it becomes harder to replace.

### **Diarmid Hearn, National Trust for Scotland**

**Q:** What are thoughts on enforcement? Developers tend not to like open ended commitments. What is the responsibility for making sure the new replacement is cared for and looked after?

*Hannah commented that in England they are looking at conservation covenants. This is more secure for the longer term. If the landowner sells and someone else takes the land, they would still be bound to deliver whatever it is that the developer has built on.*

### **Clare Symonds, Planning Democracy**

**Q:** In relation to threats and opportunities. Increasing fees as a way of raising money to help our local authorities. However, developers feel more entitled to give a more efficient service. Is anyone working on this currently to ensure that any money we get from fees goes to improving the officer's understanding and implementation of BNG or getting more ecologists into local authorities. Local developers tend to engage their own ecologists which is restrictive.

*Charlie highlighted that this is a wider issue looking at investing in nature and isn't just limited to capital projects on the ground. It is looking at investing in wider expertise and building the framework to enable those things to happen at the scale we need them to happen. We are currently developing a justification for this in terms of how many jobs there are working in nature and the economic opportunity. But we also need to see specialists in local government able to understand what is presented and interpret it and contribute and influence decision making on these issues.*

Hannah noted that in England some councils have been successful in creating a model where the implementation of their BNG approach is self-funded. They have devised a way to receive contributions which they can then use to implement the creation/ management of projects as well as funding specific officers to implement the approach. Elsewhere councils are looking to implement the same approach. It is still something to be tackled but there are models that people are using.

**Bruce Wilson, Scottish Wildlife Trust**

**Q:** One of the desires in England is to use the Nature Recovery Network to map out where net gain goes on the landscape. Are there any examples of where this is happening in England?

*Jason noted that they have work coming up with Natural England on the Nature Recovery Network so can find out more information.*

**Alistair Whyte, Plantlife**

**Q:** How does the DEFRA metric count for connectivity? E.g., hectare habitat doesn't always have the same value expense. Is connectivity built into the metric in a way that we think works?

*Hannah thinks they attempted to, but it didn't work very well. The latest version hasn't included connectivity, but they haven't completely dropped it. There is another factor which accounts for where something is, called strategic significance. The metric tries to allow for creating or enhancing biodiversity in particular places that are particularly beneficial. However, this is a significant issue.*

**Darryl Cox, Bumblebee Conservation Trust**

**Q:** Have there been any international examples of BNG?

*Jason highlighted CIEEM's work on BNG. They [published principles and guidance](#) along with a number of [case studies](#) which might be of use.*

**Bruce Wilson, Scottish Wildlife Trust**

**Q:** There is potential for BNG to provide nature-based solutions. Concerned that it might be deployed to provide those NBS instead of a net gain element. We might not get the nature benefit and instead see an alleviation or carbon sequestration ecosystem service delivery. Have you covered anything around the interface of NBS and net gain?

*Jason raised concerns about how you make the decision on what to do on what piece of land. In England they are starting with BNG as the building blocks. E.g., carbon sequestration, you are starting with the BNG first.*

**Andrew Whitehouse, Buglife**

**Q:** Invertebrates have been poorly served by the planning system. Can the speakers reassure me that species without particularly protected status will be adequately protected/provided for through BNG?

*Hannah commented that BNG considers all habitats that will be affected by the development. Traditionally, you tend to look at habitats that are on the Scottish Biodiversity List or Annex 1 etc. If they don't have those designations, then they tend not to be included. However, with BNG all habitats have to be considered. Therefore, hopefully invertebrates will be better catered for than they have previously. A challenge could be brownfields, where it is not yet clear if BNG will better tackle that or not.*

*Charlie noted that NatureScot has been tasked with bringing forward a list of measures that they would consider to be positive effects for biodiversity. Expected to be part of the document being consulted on for NPF4. Will include types of development and what you can put into them that will be nature positive. Not quite the fix and ambition that is needed but within that there may be some potential to secure some measures that will be particularly supportive of insect life.*

**Andrew Whitehouse, Buglife**

**Q:** The lack of baseline services for invertebrates. Are there enough entomologists for the huge demands that will come through when BNG is delivered in the way we want it to be?

*Charlie said this goes back to investing in nature. Not at present but it could be.*

*Jason noted that they are doing a lot of training on BNG so hopefully the skills are improving and increasing.*

**Beryl Leatherland, SWLG**

Concerned about the ongoing monitoring and evaluation to see how successful plans and strategies are in delivering what you want them to to/expect. Observation that monitoring is labour intensive, and you can rely on citizen science to a certain extent, but all these plans do need some monitoring strategies to be built into them.

**Annie Robinson, CIEEM**

NatureScot is doing a review of around 100 planning applications that have happened in the last 10 years to see how successful they have been in delivering biodiversity. It will give a good baseline of where the problems are at present. Hopefully it will be a comprehensive study and will help identify these gaps and some of the consistency across local authorities. Hopefully will be an important baseline to identify where we are at, where we can take these approaches going forward and how we can link them together. Stewart is presenting at the CIEEM Scotland Conference in the first week of October so the report will come shortly after.

## **Closing remarks**

Deborah summarised the key messages from each presentation as well as the discussion with the audience.

Biodiversity Net Gain offers a mechanism to move from net loss towards net gain and putting back more than we lose. The BNG principles, developed in England, are a foundation for this and help identify what BNG can enable us to do and where some of the issues may lie within those principles and their application.

Environmental net gain (ENG) is a developing concept in England and, although it is not mandated legally yet, there are clear examples of how it is being delivered in England that will be instructive for Scotland. The ENG approach also brings concerns and opportunities. A fundamental element of ENG is however BNG., so the importance of having a robust BNG mechanism and process that delivers for biodiversity on the ground and over time is crucial. that this approach brings.

There are examples from across the world and in Scotland of how nature positive action has been embedded at scale within other actions. Nature Networks should sit as a glue between strategies and targets that are already in train in Scotland. Targets and actions coming out of both COP26 and will

become a key tool in strategies in Scotland, including NPF4, the Rural Land Use Partnerships and the Natural Environment Bill and updated Biodiversity Strategy. While nature networks can provide a spatial planning mechanism, they are also, very importantly, a tool for collaboration and a visualisation tool. They allow us to reach across sectors and across specialisms. They will be key in taking BNG forward.

Sources:

- [Briefing paper on ENG](#)
- [Principles on ENG](#)
- [Biodiversity Net Gain – Good practice principles for development \(2016\)](#)
- [Biodiversity Net Gain – A practical guide \(2019\)](#)
- [Biodiversity Net Gain – Case Studies \(2019\)](#)
- [Principles on BNG](#)
- [Blog and report](#) from the joint event CIEEM held with BES on Opportunities for Implementing BNG in Scotland
- [LINK Biodiversity Offsetting discussion paper](#)

*Scottish Environment LINK*  
*September 2021*  
[information@scotlink.org](mailto:information@scotlink.org)

## Attendees

Juliet Caldwell	Scottish Environment LINK
Deborah Long	Scottish Environment LINK
Charles Nathan	RSPB Scotland
Jason Reeves	CIEEM
Hannah Williams	WSP
Alistair Whyte	Plantlife Scotland
Andrew Whitehouse	Buglife
Annie Robinson	CIEEM
Beryl Leatherland	Scottish Wild Land Group
Bruce Wilson	Scottish Wildlife Trust
Clare Symonds	Planning Democracy
Darryl Cox	Bumblebee Conservation Trust
Diarmid Hearn	NTS
Fanny Royanez	Scottish Environment LINK
James Curran	LINK Honorary Fellow
Jamie Robins	Buglife
Janine Ballantyne	National Trust for Scotland
Juliette Camburn	Keep Scotland Beautiful
Kathy Wormald	Froglife
Natalie Stevenson	Buglife
Rachael Fairbairn	Scottish Environment LINK
Ruby Temple-Long	RSPB Scotland
Suzie Saunders	Woodland Trust Scotland