



Iceni Briefing Note

BIODIVERSITY NET GAIN | NOVEMBER 2022





Biodiversity Net Gain

INTRODUCTION

The UK National Ecosystem Assessment (NEA), published in 2011, found that 40% of priority habitats and 30% of priority species are declining in the UK, with at least eight species having become extinct since 2002. Biodiversity loss must be addressed in order to safeguard the huge value that nature contributes towards the UK economy and well-being of the population. The Dasgupta Review (2021) reinforced this point by emphasising the interdependence of nature and economics. To safeguard the future of our critical natural environment, the principle of biodiversity net gain will be embedded in planning policy. Biodiversity net gain is defined as “an approach to development that aims to leave the natural environment in a measurably better state than beforehand”. In this way, “any damage from human activities and development to biodiversity need to be balanced by a least equivalent gains for biodiversity”.

EMERGING POLICY CONTEXT

It is intended that the delivery of a net gain in biodiversity will be mandated through the Environment Act, which received royal assent in November 2021. The Act sets out the framework for biodiversity net gain requirements, whilst leaving some additional detail to be provided within secondary legislation, policy and guidance.

The mandatory biodiversity net gain process will be additional to existing requirements for Environmental Impact

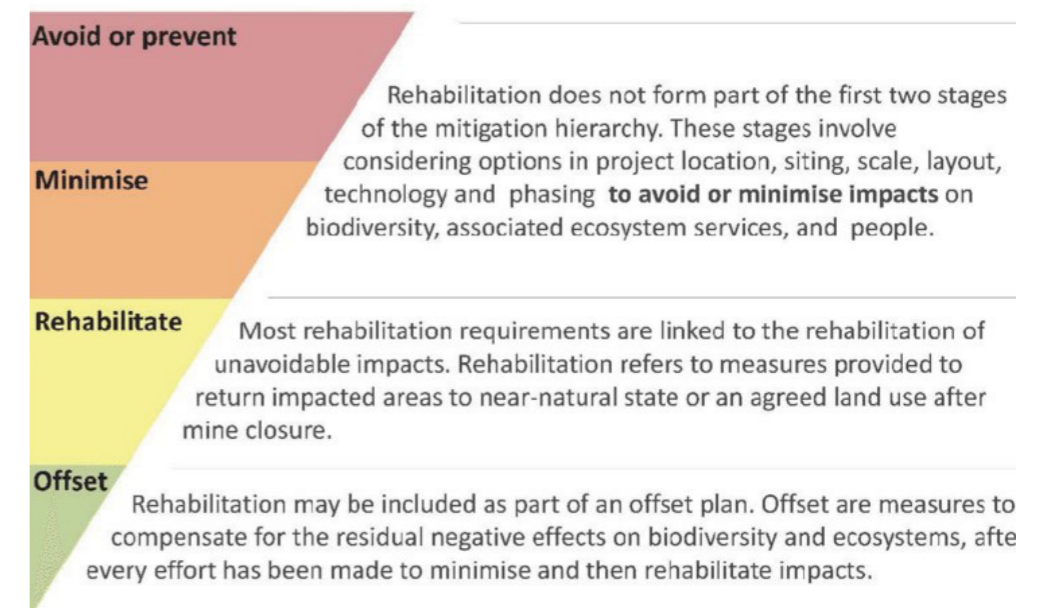
Assessment, Strategic Environmental Assessment, and Habitat Regulations Assessment. It is recognised that there are opportunities to align reporting to avoid duplication.

It is currently intended that the requirement for mandatory net gain will be applied to new development requiring planning permission from November 2023 onward. This will be implemented through the planning system, and developers will be required to demonstrate a minimum 10% net gain in biodiversity units for area-based habitats and relevant linear habitats.

A consultation ran between January and April 2022, with the aim of testing the proposals to ensure the final legislation related to the delivery of biodiversity net gains is robust, and that it provides the clarity needed to transition to a biodiversity net positive planning system. With some 180,000 comments received, it is expected that the results of the consultation will be published by the end of 2022.

WHAT THIS MEANS FOR DEVELOPERS

The mandating of biodiversity net gain means developers will be required to demonstrate strategies employed within developments that result in minimal habitat loss and biodiversity net gains, as well as quantification of the value of this increase. Failure to achieve a net gain in biodiversity on-site will mean compensation must be secured through local projects, or payment of a fee to contribute to habitat creation projects further afield.





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ACHIEVING BIODIVERSITY NET GAIN

It is intended that net biodiversity gain be achieved in a way that is consistent with the mitigation hierarchy. Approaches to achieving a net gain in biodiversity should also reflect the 'spatial hierarchy', with a preference for local enhancements, as follows:

1. Aim to avoid or reduce biodiversity impacts through site selection and layout.
2. Enhance and restore biodiversity on-site.
3. Create or enhance off-site habitats, either on land in the same ownership, or by purchasing biodiversity units on the market.
4. As a last resort, and to prevent undue delays, statutory biodiversity credits may be purchased from the UK government. This will be acceptable only where it can be demonstrated that a biodiversity net gain cannot be achieved through the available on-site and off-site options.

On-site provision will be expected to follow the mitigation hierarchy whereby damage should be avoided in the first case and minimised and remediated where this is not possible. Retention of existing habitats on sites should be a priority in achieving biodiversity net gain, though it is appreciated that this is often not achievable on new developments. As a last resort, therefore, habitat damage should be compensated for.

Compensation may be achieved on-site in the form of green infrastructure which, on top of providing new habitats and strengthening wildlife networks, can also bring about non-

biodiversity related benefits. These benefits include reduced noise pollution, reduced flood risk, reduced heating and cooling costs, improved air quality and other health benefits associated with access to nature. Systems that may be employed in these instances include living walls, green roofs and rain gardens.

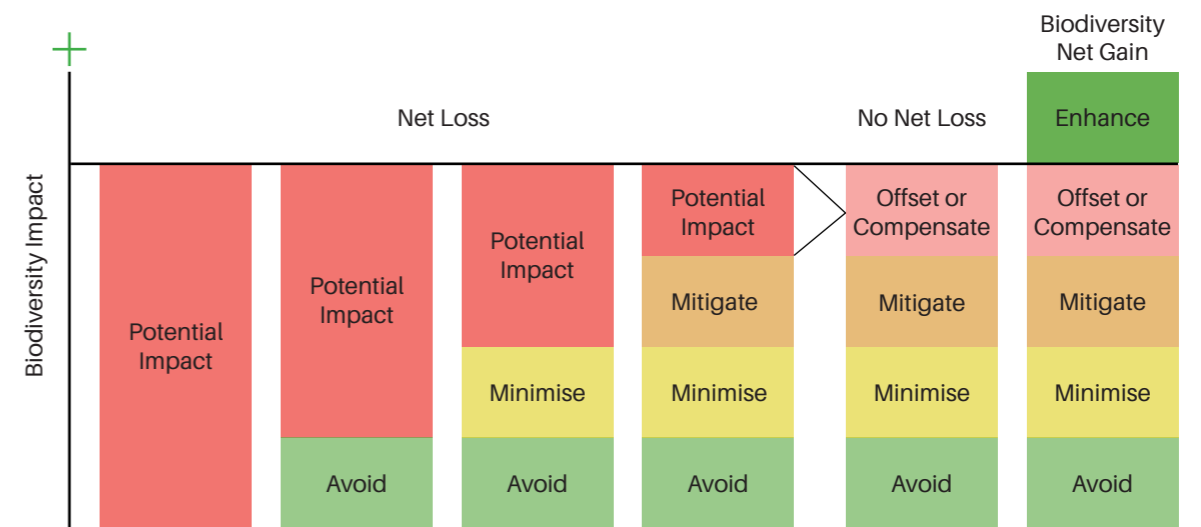
CALCULATING BIODIVERSITY NET GAIN

In preparation for the mandating of biodiversity net gains, Defra has updated the Defra Biodiversity Metric with the view that it be used for all developments to aid calculation of biodiversity net gains. The effect of a development on biodiversity can be calculated as:

$$\text{Post-intervention biodiversity units} - \text{Pre-intervention biodiversity units} = \text{Net change}$$

Pre-intervention biodiversity units are dependent on the area of the habitat parcel, its distinctiveness, condition, and strategic location. The post-development biodiversity units are calculated using these same conditions, plus the difficulty, time to target condition and spatial risk associated with the land use changes brought about by the development. The metric includes functionality to recognise that creating or enhancing habitat in advance reduces the delivery risk associated. Functionality to allow for delayed creation or enhancement of habitats and linear features is also included. Both terrestrial and inter-tidal habitats are included within the metric.

The components of the calculations above are outlined in more detail within the Defra Biodiversity Metric 3.0 user





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guide. As detailed above, a target biodiversity net gain of 10% for all developments will be mandated.

By calculating a pre-development biodiversity score for the site, a clear target for the post-development value can be set. Defra has proposed that a baseline map of site biodiversity scores may be compiled, with Local Authorities expected to keep it up to date. Should this data become available, it may be possible to bypass the need for a professional ecological assessment of the pre-development site as automated tools will be made available, thus reducing costs and lead times.

DEVELOPMENT WITHIN SCOPE

The Environment Act's biodiversity net gain requirement will apply to:

- Developments for which planning permission is granted under the Town and Planning Country Act 1990. A new planning condition for net gain will be applied, which must be met before development may commence.
- Nationally Significant Infrastructure Projects (NSIPs), consented under the Town and Planning Country Act 1990. A new requirement to meet a biodiversity net gain objective will be applied

At this stage, the proposals apply to development in England and Wales only.

DEVELOPMENT FOR WHICH PLANNING PERMISSION IS GRANTED UNDER THE TOWN AND COUNTRY PLANNING ACT 1990

For this type of development, it will be a mandatory requirement to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. This requirement will be framed as a pre-commencement condition, and this must therefore be discharged before development can begin. It is noted that local planning authorities may set higher percentage targets, and these targets should be made clear at an early stage in the planning or development process.

Discharging a biodiversity net gain pre-commencement condition will require the submission and approval of the development's biodiversity net gain plan. Applicants should also include the following core information within applications:

- The pre-development biodiversity value;
- The steps taken to minimise adverse biodiversity impacts;
- The proposed approach to enhancing biodiversity on-site; and
- Any proposed off-site biodiversity enhancements

(including the use of statutory credits) that have been planned or arranged for the development.

Provision of the core information listed above as part of applications for planning permission will be mandated through secondary legislation. A biodiversity net gain plan will not be required at this stage, due to the fact that details of landscaping may not be fully developed at this stage, or because the detail of biodiversity gain plans may be contingent on other matters, such as site investigations.

It is intended that biodiversity net gain plans may be submitted either within a planning application, before permission is determined, with the net gain condition being immediately discharged, or after planning permission is granted but before commencement of development. On-site net gains should be secured for delivery within 12 months of the development being commenced or, where this is not possible, prior to occupation.

Biodiversity gain sites associated within development under the Town and Country Planning Act 1990 will be required to be maintained for a minimum of 30 years from the time of habitat creation.

EXEMPTIONS

The UK government will not introduce broad exemptions for from delivering biodiversity net gain, with the exception of applications for permitted development and householder applications. Instead, exemptions will be introduced for the most constrained types of development which do not result in substantive habitat losses. The following development types are therefore proposed to be made exempt from the biodiversity net gain requirement:

Developments impacting habitat areas below a 'de minimis' (minimal) threshold.

Proposals that fall under this category are those that will result in negligible to minimal impacts to low or medium distinctiveness habitats. In practice, there will also be an exemption from having to provide habitat enhancements on sites where the baseline biodiversity score is zero, according to the biodiversity metric. However, it should be noted that this is separate from the de minimis exemption, which will set a threshold below which impacts to habitats are exempt from the net gain requirement. The following definitions and clarifications therefore apply:

- The de minimis threshold will apply to the sum of all habitat types within a development site, and not the size of the development site as a whole. In this context, habitat refers to areas of vegetation or bare earth, and therefore does not include sealed surfaces, such as concrete, asphalt or existing structures.



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- The de minimis threshold will apply to development which impacts low and/or medium distinctiveness habitats only, and development that results in an impact on priority habitat will therefore not be exempt.

It is intended that the exemption of developments that fall under this category will aid in ensuring the biodiversity net gain requirement is proportionate, and avoids the risk of incentivising habitat degradation on sites with habitat areas that are above the threshold.

Householder applications.

Proposals that fall under this category are those referred to as 'householder applications' and include, but are not limited to, proposals for extensions and loft conversions. It is considered that the exemption of these applications will aid in ensuring that the mandatory biodiversity net gain requirement is proportionate.

Change of use applications.

Change of use applications typically would not include physical changes with the potential to result in habitat losses. It is therefore considered appropriate to exempt this type of development. However, it is noted that some material change of use applications may result in impacts on habitats, and the government is considering how these may be defined, and whether these applications should be subject to the statutory biodiversity net gain condition.

As part of the continued development of the biodiversity net gain requirement, the government is also considering the exemption of the following development types:

Creation of biodiversity gain sites.

The government are considering whether or not to make an exemption for projects which enhance biodiversity for the purpose of discharging the mandatory net gain condition. Where an off-site biodiversity gain proposal itself requires planning permission, the enhancement may require its own planning permission and 10% net gain. This would effectively decrease the biodiversity gains created and may make such projects less attractive. This could be prevented by exempting these projects or applying a 0% biodiversity net gain (no net loss) requirement to them.

To avoid creating a loophole that could be exploited by general development delivering biodiversity net gains, it is proposed that the exemption would apply to projects which only enhance biodiversity for the purpose of net gain, though there is potential that this may be extended for a small range of other environmental impact mitigation purposes.

Self-builds and custom housebuilding.

It is considered that there is not a clear need to exempt this type of development from the biodiversity net

gain requirement, as these developments are typically ambitious with respect to delivering sustainability and, as they are typically small-scale, would likely be subject to other exemptions and process easements. However, the exemption of this development type is being considered due to the fact that self-build development is exempt from the Community Infrastructure Levy, and because this sector typically has a lower impact than volume house building and is more cost sensitive.

It is intended that net gain costs for self-build development should be passed into land prices, rather than increasing build costs. It is also noted that the government does not want to inadvertently exempt large-scale development that includes custom-build plots. Exempting this type of development should not make the application of the biodiversity net gain requirement to custom-build projects more difficult than for other development types and should complement the wider sustainability efforts within the sector.

SITE-SPECIFIC GUIDANCE

Development within statutory designated sites for nature conservation.

Protected sites are afforded a high level of protection in law and planning policy, which ensure development is delivered sustainably, and that any impacts on these sites are avoided, mitigated or, as a last resort, compensated.

It is intended that the biodiversity net gain requirement will be additional to any existing legal or policy requirements for statutory protected sites and their features, including restoration and conservation of designated features. The requirements will need to be dealt with separately, and on an individual basis, by the developer and relevant planning authority. In this way, achieving biodiversity net gains should not be seen, or claimed, as a justification for otherwise unacceptable development on statutory designated sites.

Irreplaceable habitat.

Irreplaceable habitat has such a high value in biodiversity terms, and its creation is so difficult, that meeting the biodiversity gain objective could be impossible, or extremely difficult, for any development resulting in its loss. It is understood that a net gain cannot be achieved where irreplaceable habitat is lost, and this is not adequately measures by the biodiversity metric. The Environment Act therefore makes provision for 'modifying or excluding' the application of the biodiversity net gain requirement in relation to development where irreplaceable habitat is present on-site. Secondary legislation will be used to remove development, or component parts of development, on irreplaceable habitats from the scope of the requirement for 10% biodiversity net gain.

It is proposed that any developer proposing development on



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irreplaceable habitat would still be required to submit, for the planning authority's information, a version of a biodiversity gain plan providing information about irreplaceable habitats present before and after development, and the steps taken to minimise adverse effects on these habitats. This information will be helpful in assessing impacts on irreplaceable habitats, informing decision making and may contribute in part to designing any appropriate compensation.

Where there are no direct or indirect negative impacts on an irreplaceable habitat, appropriate enhancements could be made to it as part of a net gain plan. These enhancements would be included as part of the overall biodiversity metric calculation.

Phased development and development subject to subsequent applications.

A method of securing the principles around how biodiversity net gain will be delivered needs to be in place when outline permission is granted, with a further approval process once details are submitted or permission is otherwise granted for phased development.

It is proposed that for development of this type, an explanation of the strategy to achieve the biodiversity net gain across the whole site, and on a phase-by-phase basis, will be required. It is expected that this would include:

- Key principles that will be followed to ensure biodiversity gain commitments are achieved through subsequent detailed design.
- How biodiversity net gain delivery will be tracked on a phase-to-phase basis, including the target percentage gains to be delivered at each stage. For most phased developments, it is intended that biodiversity gains should be 'front-loaded' into earlier stages to avoid the risk of net losses being caused by later stages being delayed or cancelled.
- The approach to be taken in the event that subsequent phases do not proceed or fail to achieve their targets.
- The pre-development biodiversity value for the whole site should be agreed as part of the framework plan and used as the basis for agreeing the detailed proposals.
- A mechanism to link the framework plan to subsequent applications pursuant to the approved development.

For minor non-material amendments or for variation of conditions, the net gain condition imposed on the original permission will continue to apply, and the outcome of the application cannot result in the dis-application or variation of the net gain condition.

Small sites.

Following the 2019 biodiversity net gain consultation, the definition for 'small development' has been narrowed for

when applying the simplified 'small sites biodiversity metric':

'Sites of fewer than 10 residential units or an area of less than 0.5 hectares for other types of development (unless priority or protected habitats are present).'

Version 3.1 of the Small Sites Metric was published in May 2022, and this will be subject to further consultation before Version 4, the final version, is expected to be published as a metric for use in the mandatory net gain requirement in 2023. It is also understood that efforts are being undertaken to provide services that automate elements of completing the biodiversity metric tool, which will aid in minimising the process burdens.

It is currently also intended that small sites will also be subject to the mandatory net gain requirement from November 2023. Small sites will also be required to achieve a minimum 10% net gain, as it is considered that all sites should make a proportionate contribution to net gain.

REPORTING, EVALUATION AND MONITORING

At a project level, monitoring requirements will be set by the local planning authority as part of planning conditions and obligations to secure off-site and significant on-site habitat enhancements. Where enhancements are to be secured via conservation covenants, the responsible body should ensure the appropriate monitoring proposals are also secured.

The number of monitoring assessments will depend on habitat types and extents, however it is currently expected that, for a medium sized habitat creation project, reports would be required for years 2, 5, 10, 20 and 30.

It is noted that monitoring must be proportionate, with monitoring reports required to include as a minimum, a summary of habitat type, extent and condition. This will include a comparison, where applicable, with the expected condition proposed in the biodiversity gain plan. Monitoring reports should be secured so that they are submitted to the local planning authority, the register operator if off-site habitat is included, and the relevant responsible body if a conservation covenant is used.

At a policy level, a number of biodiversity net gain mechanisms and wider policies will support the policy-level monitoring of biodiversity net gain outcomes. Public authorities will be required to periodically consider and take actions to conserve and enhance biodiversity, with an additional requirement for local planning authorities and other designated authorities to publish Biodiversity Reports every 5 years. These reports must contain a summary of the authority's past and planned action, alongside other specified quantitative data. Furthermore, information about



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any biodiversity gains resulting or expected to result from biodiversity gain plans approved by the authority during that period will also need to be published with the Biodiversity Reports. This is likely to comprise the following information:

- Quantity, composition, and location of expected biodiversity gains or losses, split by on-site, off-site and gains achieved through credits.
- Number of developments impacting irreplaceable habitat, protected sites, and protected species.
- Results of biodiversity net gain monitoring.
- Actions taken by the planning authority to carry out biodiversity net gain planning functions during the reporting period.
- Plans for carrying out biodiversity net gain planning functions over the next reporting period.

ADDITIONAL EMERGING POLICIES

To meet the ambitions of the 25 Year Environment Plan, it is recognised that additional policies, beyond that mandating net gains in biodiversity may be required. The most relevant of these policies are as follows:

- **Conservation Covenants** - a voluntary and standalone legal mechanism that may secure long-term conservation management obligations.
- **Environmental Land Management Schemes** - payments for measures such as habitat creation and restoration, as well as species management actions.
- **Environmental Gain** - building on biodiversity net gain to achieve increases in the capacity of affected natural capacity to deliver ecosystem services and wider positive impacts on natural capital.
- **Local Nature Recovery Strategies** - locally produced spatial planning frameworks, agreeing priorities for nature recovery, and mapping valuable existing areas of nature and proposals for creating or improving habitat.
- **Nature Recovery Network** - expansion and improvement of the Nature Recovery Network, including the creation or restoration of 500,000 hectares of additional wildlife-rich habitat.
- **Species Abundance Target** - a legally binding target on species abundance for 2030 to halt the decline of nature under the Environment Act.
- **Species Conservation Strategies and Protected Site Strategies** - provision of a more strategic approach to the complex challenge of protecting and restoring species and habitats.
- **Strengthened Biodiversity Duty** - ensuring public authorities consider how they can enhance biodiversity.
- **Planning Reform** - the next steps of the planning reform are expected to include biodiversity as a core objective.

CONTACT US

If you have any further queries regarding the mandating of biodiversity net gain or what this means for your scheme, please don't hesitate to get in touch with a member of our team.



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NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECTS (NSIPs)

As for development under the Town and Country Planning Act 1990, it is intended that the biodiversity net gain approach for NSIPs will be applied widely and with minimal exemptions. It is expected that the mandatory 10% net gain will be applied to all NSIPs, however it is noted that modifications may be necessary in some cases where it is not possible to achieve this target. For the majority of cases, the net gain requirement will become mandatory in November 2023, however it is noted that this may not be appropriate in some cases, particularly where unexpected delays or amendments to permissions occur.

The biodiversity net gain requirement for NSIPs will be brought forward through a 'biodiversity net gain statement(s)', which will be published as standalone policy documents, and which will be applicable to a range of relevant types of NSIPs. The statement(s) will set out the requirements for all types of NSIPs, the date from which the objective is expected to be achieved, and the stage of the project design to which commencement thresholds will apply. It is expected that the requirement will be applied across all terrestrial projects by November 2025, although some infrastructure types may be required to deliver net gains earlier than this.

The mitigation hierarchy will apply to NSIPs in the same way as for development under the Town and Country Planning Act 1990. It is intended that off-site enhancement will be registered via the biodiversity net gain register to maintain transparency and facilitate monitoring. It is noted that additional or alternative mechanisms may also be required to encourage enhancements of the developer's wider estate.

The applicant must clearly demonstrate that the biodiversity net gain objective has been met through the examination process, which will involve the submission of a biodiversity gain plan as part of the development consent application. Enhancements will be secured with Requirements included in the Development Consent Order, or through conservation covenants.

It is expected that the standalone policy documents provided for NSIPs will confirm whether a distinction should be made for NSIPs between on-site habitats in the development area and dedicated mitigation areas. This is due to the fact that NSIPs often require significant areas for environmental mitigation or compensation within their site boundaries, which may cause the achievement of the required 10% biodiversity net gain more challenging.

Habitats created as part of the NSIPs must be maintained for a minimum of 30 years from the time of habitat creation,

however it is possible that longer maintenance periods will be considered for off-site biodiversity gains allocated to NSIPs, to reflect their longevity and national significance. It is noted that increasing the length of the minimum duration may cause increased costs or result in less fluidity in the off-site gains market.

OFF-SITE BIODIVERSITY GAINS

A market to supply off-site biodiversity gain will be established, with landowners or managers who can create or enhance habitat to the required standards on their land being able to sell the resulting biodiversity units. It is estimated that approximately an annual demand for 6,200 off-site biodiversity units will be generated, and it has been concluded that the market will have the potential to meet this. However, there is a possibility that local shortages will occur in the early years of the market, however it is noted that this may be alleviated through the use of biodiversity units purchased outside the local area.

Off-site net gains must be secured through a conservation covenant or planning obligation, and registered prior to the approval of the biodiversity net gain plan. As with on-site gains, off-site works will be required to commence as soon as feasible, and no more than 12 months after the discharge of the pre-commencement biodiversity net gain condition.

It is intended that the price for biodiversity units will be agreed between buyers and sellers. The UK government is not intending to provide a centralised trading platform, nor to take on roles that may be performed by the private sector, such as brokering. However, a publicly accessible biodiversity gain site register will be established, with the expectation that, in time, the private sector will aid in collating and sharing market supply, demand and price information.

HABITAT BANKING

Habitat banking will aid in smoothing the supply and demand for biodiversity units, by making them available for sale when needed by developers. This is expected to enable the delivery of larger, more strategic sites for nature. Parcels of land associated with biodiversity units sold to a developer will need to be secured by a legal agreement and registered prior to the approval of the biodiversity gain plan. Habitat created or enhanced after 30 January 2020 will be eligible for registration and sale, provided all relevant criteria are met.

THE BIODIVERSITY GAIN SITE REGISTER

For off-site gains to be included within a development's biodiversity net gain plan, they must be registered on the biodiversity gain site register. This will involve an online application to the register operation, who will assess whether

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the application meets the relevant criteria. If a development does not require off-site units to achieve a 10% net gain in biodiversity, registering to the biodiversity gain site register will not be necessary.

For a site to be considered eligible for inclusion on the register, it must meet the following criteria:

- It is subject to a conservation covenant or a planning obligation that will require habitat enhancement:
 - on land made available by a site provider with sufficient rights to the land;
 - by a specified person or body that is considered fit and proper to undertake the enhancement works;
 - to be suitably managed to meet the required enhancement;
 - to have commenced by 30 January 2020 or later; and
 - to be maintained for at least 30 years after the completion of those enhancement works.
- The enhancement:
 - is measured using the biodiversity metric against a baseline metric assessment;
 - may be allocated to development in accordance with the terms of the conservation covenant or planning obligation;
 - complies with the rules on additionality and stacking including on protected sites; and
 - is in England.

The register will detail, at a minimum, the following:

- The location of gain sites.
- The area or length and type of habitats created or enhanced.
- The number of biodiversity units resulting from habitat creation or enhancement, calculated using the biodiversity net gain metric.
- The planning reference of the development to which the enhancement is allocated.
- Habitat Management and Monitoring Plans for gain sites.
- The enforcement body for gain sites.

It is intended that all the information listed above will be publicly accessible on the register, unless there is a legitimate reason to limit access.

ADDITIONALITY

'Additionality' is an important principle in impact compensation, and is defined as:

"A real increase in social value that would not have occurred in the absence of the intervention being

appraised".

Provided enhancements meet all other requirements for biodiversity net gain, it is proposed that:

- Measures delivered within a development boundary may count towards biodiversity net gain provided the biodiversity metric recognises an uplift in biodiversity value. This included measures delivered to comply with a statutory obligation or policy, such as green infrastructure or sustainable drainage.
- Mitigation and compensation measures for protected species may count towards biodiversity net gains, but may not account for the 10% net gain required, which should be delivered through separate activities.
- Adequate mitigation and compensation measures for any on-site and indirect impacts on statutory protected sites must be agreed with the decision maker, and should be included in the biodiversity metric calculations alongside any loss of protected habitats.
- Actions and measures within River Basin Management Plans may be used to achieve biodiversity net gains.
- Organisations subject to the Natural Environment and Rural Communities (NERC) Act 2006 may generate and sell biodiversity units.

It is currently being considered whether the additionality principle may be applied to the enhancement of non-designated features within statutory protected sites. All habitats, including designated features of protected sites, located in intertidal zones or less than 2km above the mean high water mark will be eligible for enhancement through biodiversity net gain.

At this stage, the government is minded to allow landowners and managers to combine payments for biodiversity units with other payments for environmental services, such as carbon sequestration, from the same parcel of land, provided they are paying for distinct, additional outcomes.

STATUTORY BIODIVERSITY CREDITS

The UK government will be able to sell statutory biodiversity credits to developers in order to avoid unreasonable delays in the planning system, should a developer be unable to deliver the required net gain on-site, off-site or through the purchase of biodiversity units on the market. The purchase of statutory biodiversity credits will be a last resort. It is noted that, whilst these credits may need to be available as soon as the requirement for net gains is mandated, the risk of undermining the establishment of the biodiversity unit market will need to be mitigated. A credit price will be set and published in advance of the biodiversity net gain requirement becoming mandatory.

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The preferred approach at this stage is for developers to purchase credits prior to the final approval of biodiversity gain plans and the discharge of the pre-commencement condition. The use of credits will be regularly reviewed, with a view to minimise their use, and phase out their provision at the earliest opportunity, once the biodiversity unit market has matured and there is no longer a need for them.

Revenue generated from the purchase of statutory biodiversity credits will be invested in strategic habitat creation and enhancement, which will deliver long-term environmental benefits, in line with the priorities of Local Nature Recovery Strategies. Investment will seek to address specific gaps in the market, particularly in terms of the types and locations of habitats that are impacted by development but which are not available on the market. This is expected to aid in delivering higher distinctiveness habitats.

Credit investment will demonstrate additionality, and an annual review of investments will be published to show the types and locations of projects that have been funded. Transparent and robust monitoring, evaluation and reporting will be provided, and it is intended that credit investment sites will also be included on the biodiversity gain site register.



The Sustainable Development Scorecard

The National Planning Policy Framework (NPPF) has running throughout it the 'golden thread of sustainable development'. In spite of this, there is no clear-cut, NPPF-based assessment criteria to consider a site or project's sustainable development credentials, making current assessment processes both tricky and subjective.

The Sustainable Development Commission was established to address this recognised issue with our planning system. Made up of a balanced cross-section of industry professionals, the Commission has debated the issues and found solutions, culminating in the creation of the Sustainable Development Scorecard.

The Scorecard website is free to use and accessible to anyone with a vested interest in development, including developers, architects, planners, community groups and members of the public. By crystallising the NPPF's guidance into a simple, online analysis tool, the Commission aims to provide a more consistent approach to sustainable development, leading to a more sustainable built environment.

www.thescorecard.org.uk

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