Biodiversity Metric for Scotland's Planning system - Key issues

1. Your Contact Details

What is your name?

Jamie Corletto

What is your email address? It will be helpful if you can provide us with your contact details in case there are points in your response that we wish to follow up on.

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Are you responding as an individual or an organisation? If responding on behalf of an organisation, please enter the organisation's name.

Organisation

Name of Organisation:

Neighbourhoods, Regeneration and Sustainability (NRS)

Glasgow City Council

NatureScot would like your permission to publish your response if required. Please indicate your publishing preference.

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2. The principles and rules underpinning the metric's approach

a) Do you agree with the issues identified?

Agree with most aspects and welcome progress.

However, it is noted that this consultation implies that the Scottish metric would not be required prior to determination. NPF4 states the following for Policy 3b that development 'will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management'. Therefore if the information has to be demonstrated before anything can be supported, this information is required prior to determination.

The way to effectively ensure that any meaningful application of Policy 1 is through requiring the relevant information prior to determination as this is the key time to meaningfully incorporate biodiversity etc.

The concerns noted about renewables in reference to wind farms require further clarification because conversely if only small areas within the red line boundary are being developed this ultimately leaves lots of habitat that can be enhanced and could be seen as easier to achieve a net gain than - for example - a housing development.

Key stakeholders need to include the Scottish Biodiversity Network as well as others.

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

The following require to be included:

The English Biodiversity Net Gain approach looks to deliver a 10% biodiversity enhancement, but no specific requirement is yet proposed for Scotland. The consultation document states that 'there will be further opportunities to contribute to the development of the Scottish metric as the work progresses. These future opportunities include … contributing to testing application of the metric across a range of development types'. Acknowledgement of different development environments would be beneficial. A potential example would be looking for significantly in excess of 10% enhancement on a recently cleared city centre development site (where 10% enhancement could mean very little biodiversity in practice) than we might on a site where there are significant existing habitats and 10% enhancement would be more meaningful. Additionally, NPF4 references 'significant biodiversity enhancements' which could and should be defined (for example, by adopting statistical significance definitions) following the development of the metric. Clarification on the definition will be better for consistency, efficiency and to avoid prolonged debate with resource implications. Additionally, for particularly difficult sites or sites with multiple material issues to deal with there should be flexibility in relation to a % net gain. It is important to consider the context of Glasgow, trying to regenerate a post-industrial city and the viability of dealing with these kinds of sites.

Consideration needs to be given to weighting habitats in different geographic locations including considering inclusion of aspects of the Urban Greening Factor.

Consideration needs to be given to the species that the habitats support. In Glasgow some grasslands with water voles are botanically species poor but also support a nationally significant population of a protected species (on occasions at the highest density recorded in the country). There will be other examples of important invertebrate populations on habitat this might not score highly on botanical diversity/naturalness (e.g., brownfield sites).

Expansion of the irreplaceable habitat definition is required to include greater representation across habitat types. For example, lowland raised bog is irreplaceable because of timescale and key grassland sites are also irreplaceable. The Surrey Nature

Partnership have developed criteria for this. There is also the question of how 'irreplaceable' deals with the animal assemblages such as inverts, mammals, birds.

For urban areas, and other areas with limited land/competing uses, small developments can potentially make large impacts on biodiversity/habitat connectivity, so consideration should be given to applying the Scottish metric to 3c developments too, or (as per England) a simpler metric could be specified for small developments.

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

Potential solutions include:

- Status of metric - state that it is required prior to determination in guidance.
- Weighting for locations/species- devise a weighting criteria based on Local Biodiversity Action Plan (LBAP) priorities/Scottish Biodiversity List for habitats to include geographic variation. Develop similar for species assemblages based on LBAP/Scottish Biodiversity List.
- Apply metric to 3c developments or create a simpler metric.

Irreplaceable habitats could be expanded based on LBAPs/Scottish Biodiversity Lists and consultation with key stakeholders.

3. The habitat classification system

a) Do you agree with the issues identified?

Habitat fragmentation could be considered in relation to the metric. If the aim is to enhance biodiversity then the metric should be considering how fragmented the habitats are (could they be reconnected) and also how isolated the species that rely on the habitat are. It would not benefit biodiversity if development created new habitats or safeguarded existing habitats but they are located in a way that they are fragmented and isolated from the wider green network. Equally, opportunities may be missed to reconnect habitats. This could apply whether the habitat is seen as a priority habitat or not. For example, in urban areas sometimes small areas of woodland are the only habitat in the wider area for miles. Road projects have a real potential to fragment habitats (both inside the red line boundary and outside). The metric could take this into consideration.

If the metric only calculates the biodiversity value of the site on length and area it may not be taking into account the value of that biodiversity as an important part of a habitat mosaic/where that habitat sits within the wider green network.

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

4. Irreplaceable Habitats

a) Do you agree with the issues identified?

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

The abundance, rarity etc. of species could be part of working out the biodiversity baseline as well as habitats.

The vision in the Scottish Biodiversity Strategy (which councils have a statutory duty to deliver in all its functions) includes by 2045 "Our natural environment, our habitats, ecosystems and species, will be diverse, thriving, resilient and adapting to climate change".

Therefore for the Council to deliver its statutory duties towards biodiversity species should be considered in relation to the metric. Glasgow also has many sites where there are legally protected species on site and species of high conservation value. It is important to consider their presence as they are even more important on particular sites. There is a danger that developers could disregard the habitat needs of important species and create other habitats that have little or no value to their conservation and for this to be considered as enhanced biodiversity. It would be concerning if a development was placed on an area that the important species relied upon because the metric didn't take account of their presence.

5. Habitat Distinctiveness

a) Do you agree with the issues identified?

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

6. Habitat Condition

a) Do you agree with the issues identified?

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

7. Strategic Significance

a) Do you agree with the issues identified?

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

8. Technical Difficulty Risk Factor

a) Do you agree with the issues identified?

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

Risk factors could take into account all the habitats on the site (and beyond the site boundary). "unchanged" is open to interpretation and it would be a challenge for planners who lack a detailed understanding of ecology to interpret if they really were unchanged.

In England the risk factor about whether to create new habitats is a big current issue. This is not an issue that has come to Scotland yet and it is good that it is included as it may become a growing issue in Scotland. However, the metric should give as much weight to the Scottish

situation and issues relating development sites rather than reflecting the English situation. Biodiversity is very important in Glasgow and in NPF4 to deliver other objectives including the council's climate mitigation, quality of place, heath etc. In Glasgow it would be a concern if biodiversity improvements were delivered far away from the neighbourhoods where biodiversity currently delivers ecosystem services, place quality, recreation opportunities climate mitigation etc. already. Perhaps the metric could build the need for interventions to be in the same place into the post intervention values.

How will the metric deal with the cumulative impacts of more than one development application within a small ecological area or where sides are next to one another? In urban areas and neighbourhoods that have a lot of vacant land several sites may be located next to each other. The metric could also act to secure cumulative gains for biodiversity. For example, if a developer is bringing forward a package of several sites in an area, they could be encouraged through the metric to relate the sites to one another e.g. connections, a mosaic of new habitats and ensuring there is a diverse more resilient variety of habitats in the area, especially if there are several vacant sites right next to each other.

In urban areas or across large cities biodiversity is often supported on vacant land or derelict land. This makes areas of scrub and open mosaic habitats even more important. These areas have considerable ecological importance in their own right e.g. for insects and breeding birds. One of the criticisms of the English metric is that arguably it discounts these areas as having value for biodiversity which is not the ecological reality for urban areas. On the ground in Scotland, particularly in cities and the suburbs these areas can have high value and play a considerable role in supporting biodiversity (and are often the last refuge of biodiversity). The insects they support are particularly important for the whole food chain. Particularly for urban areas where there is a considerable amount of long-term vacant land, scrub and more successional type vegetation may be very important for maintaining biodiversity in the area.

9. Temporal Risk Factor

a) Do you agree with the issues identified?

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

10. Spatial Risk Factor

a) Do you agree with the issues identified?

b) Are there any other issues relating to this aspect of England's metric that we need to consider?

c) If you have ideas or solutions for addressing the issues identified, please outline your approach.

11. Our approach to developing a Scottish Metric

a) Do you have any comments on the phased approach set out, and priorities indicated?

Due to the complexity of the topic a phased approach is required. However, it would be beneficial if updated Scottish government guidance could be developed in parallel and issued in stages also. This guidance would benefit from including best practice measures for urban areas. An example of where this would be beneficial is for a city centre site where the ultimate policy and political imperative will be redevelopment of a site but through time and neglect of sites we are seeing examples of naturalisation. Guidance is required on ways to develop these sites with care rather than creating potential additional barriers to the economic recovery of our local centres.

As the Scottish metric is now to be based on the BNG metric (subject to this consultation), it would seem reasonable to issue guidance to state that current applications should use the BNG metric. This has the added benefit of allowing local authorities to be consistent and prepare for the Scottish metric (as it will be similar). This would also give an opportunity for upskilling (e.g. training Planning/Biodiversity staff in advance) as the principles will be similar also allowing for more efficient assessment of current applications. It should be noted that currently accepting any metric puts a lot of pressure on local authorities due to the requirement for knowledge on a wide range of metrics which is not possible for many to resource.

The inclusion of regular updated guidance, as new information is available, is essential as NPF4 was approved in February 2023 and it is now over a year later, with another year to develop the metric resulting in concerns about country-wide consistent implementation of NPF4. Therefore, as noted Scottish Government guidance stating the BNG metric is to be used/this preference would be beneficial in the interim.

b) If you have any further comments on the development of a biodiversity metric for Scotland's planning system, please provide them here.