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9 May 2024

To Whom It May Concern,

Response to: A Biodiversity Metric for Scotland's Planning System – Key Issues Consultation

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 350 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainability heat and power Scotland's homes and businesses.

SR welcomes the opportunity to provide the views of our members to NatureScot on the creation of a Scottish Biodiversity Metric.

Our members agree with the key issues identified in this consultation and have highlighted the following key points, which are covered in further detail below:

- We want to ensure that, through this process and through the creation of a Scottish Biodiversity Metric, the Scottish Government, NatureScot and planning authorities will all have the same expectations and understanding with regards to approach and Biodiversity Net Gain (BNG) percentages.

- We encourage NatureScot to use development footprints as opposed to red line boundaries, which may overestimate potential biodiversity losses, in how a Scottish Biodiversity Metric is implemented, in particular for onshore wind.

- We encourage further characterisation of different types of peatland habitat to distinguish between blanket bog, wet modified, dry modified, etc. and assign different habitat 'distinctiveness' categories to these habitats.

- The inclusion of habitat connectivity in the output calculation may encourage a more holistic approach to BNG delivery. It allows for the identification of an important ecological feature which contributes significantly to BNG, which is currently not present in the English Metric.

We would appreciate more clarity on NatureScot's timeline for undertaking the necessary steps required to develop a Scottish Biodiversity Metric and provide the necessary training before it can be implemented. We would appreciate any dates you could provide that would indicate the initial steps of this process.

We look forward to working with NatureScot to develop a Scottish Biodiversity Metric fit for purpose in Scotland and engaging in this conversation as it progresses.

Sincerely,

Megan Amundson
Head of Onshore Wind and Consenting
Scottish Renewables

A Biodiversity Metric for Scotland's Planning System

Key Issues consultation

2.1 The principles and rules underpinning the metric's approach

i. Do you agree with the issue(s) identified?

Yes. The English Metric seems more suitable for small-scale developments such as housing. It does not work well when dealing with larger-scale developments like wind farms.

This is particularly true when dealing with habitats of high distinctiveness where the habitats can only be replaced with the same habitat type. For example, heathland habitats cannot be replaced by woodland habitats despite being a woodland understory.

Habitats of 'high' and 'very high' distinctiveness are far more common in Scotland than England, therefore 'condition' may be a better measure of habitat improvement.

We agree that the planning application's red line boundary must be addressed for the reasons outlined in the consultation, but also because red line boundaries are not habitat boundaries or boundaries for ecological connectivity. This is particularly true when considering peatland habitats and peat macrotopes.

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

1. The use of the term 'Biodiversity Net Gain' (BNG) in relation to the English Metric is problematic as the English Metric does not guarantee an increase in biodiversity. This issue is a result of the English Metric using broad habitat types as a proxy for biodiversity. This approach can result is a 'quantity over quality' approach that may not result in an increase in species diversity.
2. The metric would be more effective if it did not just focus on broad habitats, but also took account of structural heterogeneity or species diversity.

   To illustrate the consequences of this, large expanses of a 'high' distinctiveness habitat may offer limited value to maximise biodiversity if managed the same way across the site. Leaving some areas unmanaged or less intensively managed might mean the habitat reverts to one of lower distinctiveness. However, the increase in structural differences across the habitat could result in an increase in biodiversity.

Unfortunately, this approach to holistic land management is disincentivised in the English Metric as the trading rules mean that you can't trade down on distinctiveness. For example, a 'medium' distinctiveness habitat cannot be created in place of a 'high' distinctiveness habitat as would be the case in the example above.

It is noted in 'Rule 4' that the trading rules in England do not necessarily have to be followed under certain circumstances. For example, under certain ecological and hydrological conditions or where expertise exists within the restoration team. These criteria may be met more often in Scotland where higher distinctiveness habitats already exist and where there is a growing base of experience in restoration of such habitats, like in peatland restoration. Amending or removing the trading rules will also allow NatureScot to drive the priority habitats for enhancement to meet national policy and target objectives.

3. In England, a minimum 10% biodiversity net gain is required. While no indication of a similar BNG threshold requirement has been made by NatureScot or the Scottish Government, some local councils in Scotland have indicated that they will require a percentage BNG threshold. We would want to ensure that the Scottish Government, NatureScot and planning authorities are moving forward using the same expectations and understanding.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

1. The Scottish Metric should address the issue caused by the English Metric treating 'Habitat Net Gain' and 'Biodiversity Net Gain' as synonymous. The focus within the Scottish Metric should be on Biodiversity Net Gain.
2. Trading down on distinctiveness should be permitted if it can be demonstrated that there is an overall benefit to biodiversity.
3. The approach to requiring a percentage Biodiversity Net Gain threshold should be standardised across Scottish Government, NatureScot, and all planning authorities in Scotland.
4. Wind farm red line boundaries can often be larger than the area of the site developed. This can inflate the baseline biodiversity value leading to artificially increased compensation requirements that risk rendering onshore wind developments economically inviable and an unattractive proposition for landowners. The red line

boundary should be amended for certain developments to only consider the 'footprint' of the wind farm and associated development.

5. With regards to Principle 3, we would draw NatureScot's attention to other professional codes, for example the peatland code, and funding mechanisms that are prohibited under the current definition of 'additionality'. We would encourage NatureScot to look at the definition of 'additionality' in Scotland and allow bundling or stacking of ecosystem benefits to promote habitat restoration.

6. Principle 8 should link to climate resilience. There is an opportunity to interlink work on the new Scottish Government Carbon Calculator to consider land carbon (sequestration and storage). SSE Renewables has done so and can provide a model. This approach allows decisions to be made in the best interests of biodiversity and land carbon, and this approach is the first step towards a Natural Capital approach in the planning system.

7. Principle 9 does not enforce a minimum ratio for habitat lost vs habitat to be restored. Instead, the toolkit relies on several measures of habitat quality (habitat quality is also an important consideration in EIA), which is an approach that is far more site specific than a blunt multiplier.

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

We agree this is a good place to start and would encourage NatureScot to consult with industry to understand how these issues impact developments.

We would request further guidance on whether, despite potential drawbacks, the English Metric (amended or otherwise) is considered an acceptable tool for assessment. While a long-term approach is welcome and necessary, there is still a discrepancy between how NatureScot and planning authorities view approaches to assessing and measuring BNG, with no clear consensus.

2.2 The habitat classification system

i. Do you agree with the issue(s) identified?

Yes. The national vegetation classification (NVC) and Phase 1 are more commonly used in Scotland, and there are skills shortages around UK Habitat Classification (UKHab) and European Nation Information System (EUNIS) habitat classification systems.

The Phase 1 conversion table is a useful resource, but it can be subjective. Often a habitat can span two distinctiveness categories, which causes issues in quantifying biodiversity units correctly. Experience with the English Metric leads to the conclusion that UKHab and the 'Metric' specific habitats have the advantage in urban habitat classification (which may be a reflection of habitats more frequently encountered in the south of England), but Phase 1 approaches natural and upland habitats differently. It is possible to standardise the approach across habitat classifications, which both the English Metric and SSE Renewables Metric have achieved.

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

Yes. The MoRPh rivers assessment is not widely used in Scotland, so there is a significant skills shortage. A different river habitat condition assessment system may be more appropriate in a Scottish context, or an extensive training programme should be developed in the MoRPh approach.

The recent consultation by NatureScot on the Pre-Application Guidance for Solar Farms specified that EUNIS codes should be provided for all habitat surveys. This approach should be standardised across all NatureScot guidance including the new Scottish Biodiversity Metric.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

We would encourage the creation of more training opportunities for ecologists on UKHab and conditions assessments, particularly for upland habitats. Opportunities to work with the Chartered Institute of Ecological and Environmental Management (CIEEM) Scottish Committee on this should be explored.

We would also recommend the training of Ecologists on UKHab include stakeholders (inc. NatureScot and planning authorities) so they can understand and interpret the data when it is provided. Some developers have already started undertaking UKHab surveys, in expectation of needing it for a Scottish Metric, and have met some uncertainty from stakeholders when they were consulted on survey methods as they are more familiar with Phase 1.

We also encourage the standardisation of all required habitat classifications across all developments, surveys, assessments, and the new Scottish Metric.

The quantified approach to biodiversity assessment aims to set a minimum standard across the industry in the planning system. One of our members, SSE Renewables, has adjusted this by converting UKHab habitat classification into Phase 1 and Fossitt. Where there is crossover between habitat distinctiveness categories, we have provided a Phase 1 or Fossitt habitat with two 'distinctiveness' categories and detailed when to use them.

An example of this is 'purple moor grass and rush pasture', which in UKHab has as 'Very High' distinctiveness in the English Metric. The distinctiveness in the English Metric is likely a reflection of possible deep peat in this habitat type or potential groundwater dependent terrestrial ecosystems (GWDTE). However, in most cases, the ecological value is not that high, and valuing it the same as irreplaceable ancient woodland or blanket bog is incorrect in most instances.

Two distinctiveness categories can resolve this, or it could be resolved by breaking habitats out into Level 5 in UKHab. Using Level 5 definitions is required in the assessment of peatlands so that the degradation/modification of peatlands can be assessed.

The English Metric currently classes all peatland as 'Blanket Bog', regardless of whether it has been cutover or modified. We would recommend splitting out blanket bog, wet modified, dry modified, etc. and assigning different habitat 'distinctiveness' categories to these habitats in order to accurately assess the baseline condition and potential habitat improvement opportunities to incentivise peatland restoration.

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

No.

2.3 Irreplaceable Habitats

i. Do you agree with the issue(s) identified?

Yes. Irreplaceable habitats should be considered in a Scottish context (habitat extent, rarity, etc.,) rather than replicate the list of irreplaceable habitats in England. There should also be a provision to assess irreplaceable habitats within the Scottish Metric that can be used as a starting point for bespoke compensation and to reduce workload. Irreplaceable habitats should be considered with net-zero in mind and the need for onshore wind and associated grid development to achieve net-zero.

The inclusion of blanket bog as an irreplaceable habitat and how irreplaceable habitats are addressed in the Scottish Metric has serious implications for wind farm and solar development. Wind farm development in Scotland offers significant opportunities for private investment in peatland restoration and this must not be disincentivised.

While we agree that peatlands are inherently irreplaceable and that project design should be steered away from the highest value habitats, the list of irreplaceable habitats in Scotland should be carefully considered and the benefits that can come from onshore renewables developments, such as carbon reductions, private investment in habitat restoration, community funding, etc., should be taken into account.

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

In the Scotland's Rural College (SRUC) report[1] there is a recommendation that all Annex 1 and Scottish Biodiversity List habitats should be allocated a 'Very High' distinctiveness score. This would make these habitats 'Irreplaceable', result in the Scottish Metric being impractical to implement and would significantly disrupt all development. This recommendation should not be implemented.

Condition or UKHab classification Level 5 should come into the decision-making process on irreplaceable habitats. For example, blanket bog in any condition should not be considered

[1] Research into Approaches to Measuring Biodiversity in Scotland: Research into Approaches to Measuring Biodiversity in Scotland (www.gov.scot) (SRUC 2023).

irreplaceable. As an example, the SSE Renewables biodiversity net gain toolkit has made this change to better account for degraded peatlands.

The concept of irreplaceable habitats is particularly concerning for the repowering of onshore wind farms in Scotland. Many of these sites have large Habitat Management Plans that have delivered significant areas of peatland restoration, most of which extend up to existing turbine infrastructure. In these cases, repowering may be impossible without having an impact on 'irreplaceable' restored peatland habitats.

Our members have many examples of wind farm developments that have delivered large-scale peatland restoration. Some of our members have applied both the English Metric and the SSE Renewables Metric to identify key issues and areas of concern. Both metrics run the risk of disincentivising developers to deliver large-scale peatland restoration, and they both have the potential to deliver skewed numbers of biodiversity units.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

Biodiversity net gain toolkits consider one ecosystem service: biodiversity. When considering irreplaceable habitats in Scotland, we would urge NatureScot to consider the impacts of climate change and social impacts. The climate crisis and nature crisis are of equal importance. Climate change is one of the drivers of nature loss and therefore we would highlight the importance of renewable energy and achieving net-zero for a sustainable future.

It is not disputed that peatland habitats are inherently irreplaceable within the timescales of Biodiversity Net Gain. However, the Scottish Metric should fully consider the nuances of peatland habitats, particularly in relation to condition/modification. And it should incentivise developers to deliver peatland restoration projects at scale.

A Scottish Metric should either not be applied to repowering projects on peat, or, alternatively, it should fully take into account the various issues with repowering wind farm sites situated within large peatland Habitat Management Areas that have already been restored.

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

No.

2.4 Habitat Distinctiveness

i. Do you agree with the issue(s) identified?

Yes. Generally, the approach to assigning habitat distinctiveness will be appropriate. At present, the English Metric assesses distinctiveness in an English context. Habitat distinctiveness in certain habitats should change in Scotland, based on several factors, even if the general approach to determining distinctiveness remains the same.

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

Yes. The distinctiveness categories as they currently stand are not always appropriate in a Scottish context. Further thought is required regarding the type of habitat improvements that are likely to occur, for example woodland planting on 'high' distinctiveness habitats or heathlands.

In most cases, the value of these habitats cancel each other out or result in a net loss of biodiversity units. The closeness of distinctiveness categories can be a significant issue for determining actual losses and gains.

Again, we recommend further thought to Level 5 UKHab classifications and splitting out habitats like blanket bog, wet modified bog, etc.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

Issues may be resolved by including a separate multiplier (positive) within the Scottish Metric to boost certain habitats that are ecological gains but are closely matched to the baseline habitat value. Equally, the precaution within the risk factors for establishing such habitats could be assessed and reduced. The allowance of succession and carrying over the baseline value is also an important prerequisite of this approach.

In some instances, habitats at UKHab Level 5 may be reflected better with a different 'distinctiveness' category than at Level 4. Such as blanket bog – 'Very High': wet modified bog – 'High'.

Wind farm developers can bring about large-scale habitat improvements in already 'High' or 'Very High' distinctiveness habitats that are present in Scotland. At present, this benefit is under-valued in the English Metric and should be addressed in the Scottish Metric to incentivise large-scale habitat improvement like peatland restoration.

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

No.

2.5 Habitat Condition

i. Do you agree with the issue(s) identified?

Yes. We agree that habitat condition sheets require adjustment to reflect Scottish habitats. This could be minor changes to indicator species or distribution. The shortage in MoRPh accredited surveyors likely means that the river assessment strategy should be reconsidered in Scotland to prevent delays. It would be interesting to include more species information in the condition sheets to incentivise the provision of species prescriptions associated with onshore wind developments.

A review of the current approach to habitat condition assessment should be undertaken, with a particular emphasis on upland habitats.

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

Yes. There is no guidance within UKHab or the English Metric on whether coniferous plantation woodland planted on peat should be considered degraded blanket bog or coniferous plantation. Without clear guidance on this, there is a risk that a metric could de-incentivise forest-to-bog restoration.

We encourage NatureScot to consider the frequency of condition assessment. The English Metric requires a condition sheet per polygon. This is likely easily achievable on a small site but on a large site, for example a large onshore renewable development, this could introduce a burdensome level of survey effort.

Furthermore, thought is required for habitats that are to be incentivised via the Metric, for example new woodland planting is disincentivised in the current English Metric due to the condition sheets being unrealistic about what parameters are required to reach 'good' condition status. Assessment criteria for the presence of deadwood, veteran trees, canopy structure, etc., are all elements that take a long time to establish. Therefore 'good' condition cannot realistically be achieved under the English Metric rules in the timeframes available, which decreases the number of available biodiversity units. Habitats with a shorter time to target condition, like grasslands, may be favoured in this scenario, although they may not be as ecologically desirable or as beneficial to carbon storage and sequestration.

Further consideration should be given to a minimum cutoff width at which a condition assessment is required / a watercourse should be included in the BNG assessment. An upland site could result in a large number of watercourse crossings, which may be small in width or have sheet bedrock/unpassable fish barriers. The BNG assessments and resources available should be prioritised to the areas where they will be most beneficial and successful. The rivers assessment approach is likely to require significant amendments to be appropriate in a Scottish context and not introduce a burdensome level of extra survey work, particularly on large upland sites.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

A representative sample for condition is likely all that is required on large upland renewable generation sites. This should also tie in with habitat condition collected during the EIA habitat surveys so as not to introduce further workload.

Certain habitat condition sheets require adjustment to incentivise improvement to those habitats, particularly those that are costly and take a long time to establish.

Clear guidance should be provided on how to deal with habitats such as conifer plantation on peat, as this could have significant implications for the delivery of large-scale forest to bog restoration.

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

No.

2.6 Strategic Significance

i. Do you agree with the issue(s) identified?

Yes. Strategic significance requires amendment in the Scottish context. For example, the SSE Renewables Metric uses local biodiversity action plans, national biodiversity action plans, and Scottish Biodiversity List habitats as a guide for strategic significance. In the SSE Renewables Metric, 'connectivity' has been retained as a measure of habitat quality and therefore is assessed separately.

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

Yes. Strategic significance is a measure of habitat quality that Defra and Natural England retained in the English Metric, however 'Connectivity' was removed. The strategic significance within the English Metric is now the proxy for ecological connectivity. However, this is broad-brush and doesn't consider the actual permeability of the surrounding habitats, even if they are priority habitats, nor the dispersal capabilities of species on site. This could hamper both the ability of species to colonise the new site or expand out of it.

The connectivity multiplier was removed from the Metric as it was deemed only feasible for high and very high distinctiveness habitats and was challenging for users to implement.

In the consultation rounds that SSE Renewables hosted during the development of the SSE Renewables Metric, 'connectivity' always came out as one of the most important measures of habitat quality amongst the attendees.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

There is an opportunity to better link strategic significance to habitats in Scotland and possibly EIA predicted impacts. Connectivity, however, is an important habitat quality measure. The connectivity multiplier should be reintegrated into the Scottish Metric to ensure that actual connectivity is recognised. It should be reinstated alongside the strategic significance multiplier. Including connectivity also allows higher biodiversity unit outputs and could be used to incentivise national objectives like nature networks.

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

No.

2.7 Technical Difficulty Risk Factor

i. Do you agree with the issue(s) identified?

Yes. We agree that the multiplier should be reviewed to ensure that it remains fit for purpose, especially as changes in technology and policy could result in the metric output being misleading or unreliable in future contexts. This risk factor is key to incentivising developers to deliver large-scale peatland restoration.

The technical difficulty risk factor requires further consideration across all habitats in Scotland. Using a fixed difficulty rating per habitat is restrictive and does not allow flexibility in the approach. In the example used, deer browsing may negatively impact the success of a woodland plantation, and this may not be reflected in a fixed multiplier. Equally, a deer fence used as mitigation may improve the plantation success and again may not be accurately accounted for.

Concerning the conclusion that further refinements to the ‘creation’ or ‘enhancement’ multiplier are required, that may or may not be true. In the English Metric 3.1, ‘Enhancing’ a site where a coniferous plantation is felled and the blanket bog restored, as wetland blanket bog, which is ‘Very High’ distinctiveness in good condition, would result in the net gain of +4.97 habitat units. Whereas if this process was calculated as the removal of coniferous woodland (-2 habitat units) and the creation of blanket bog (+0.88), the net outcome would be -1.12 habitat units. This could be due to several factors, including the Metric retaining some baseline biodiversity value due to ‘enhancement’ of the habitat, which isn’t technically

allowed in the rules because it is a broad habitat change (woodland to wetland). This may be a quirk in the Metric.

Secondly, ‘Enhancement’ and ‘Creation’ have different technical difficulty risk factors: ‘High’ and ‘Very High’ respectively. The ‘Very High’ risk factor (0.1 success rate) associated with the ‘Creation’ of blanket bog is likely leading to this scenario.

ii. Are there any other issues relating to this aspect of England’s metric that we need to consider?

Yes. The level of precaution in the technical difficulty multiplier compounds at the higher end of the distinctiveness scale, meaning that the projected biodiversity value in the English Metric is an under-estimate of the biodiversity units that will likely be achieved.

Some of our members manage significant amounts of peatland, and the difficulty of delivering peatland restoration can vary massively, depending on site-specific factors such as felling methods, topography, hydrological regime, site location, etc. Applying a simple risk-factor to peatland restoration is too simplistic and ignores the nuances of this type of habitat restoration. Peatland restoration is inherently difficult to do, however, developers should not be disincentivised from doing it as developers offer a significant opportunity to deliver large-scale privately funded peatland restoration.

We would urge NatureScot to address this issue in the Scottish Metric, as it is likely onshore renewable developments that will be most affected by this. As a result, it could render onshore development unviable and the Scottish Metric impractical to implement.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

Further work is required to accurately assess the success rates of habitat establishment in Scotland. The difficulty factor for peatland restoration should either be removed or revised to take into account the difficult nature of restoring this habitat to ensure it is not disincentivised.

Furthermore, the level of bias (noise) in the English Metric and over-precautionary approach should be addressed. The current results can be both disincentivising and unachievable, which will ultimately render the Scottish Metric impossible to implement.

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

Renewable energy is required to reach net-zero, and developers can deploy significant amounts of private money into habitat restoration. But the system must be fair and proportionate. If this is not the case, developers will be required to secure larger habitat management plan areas, which could make projects unviable.

2.8 Temporal Risk Factor

i. Do you agree with the issue(s) identified?

Yes. This risk factor is key to incentivising developers to deliver large-scale peatland restoration.

The time to target condition values requires adjustment in a Scottish context. Whilst having fixed multipliers embeds standardisation across the assessments, it can also fail to accurately reflect the nuances at a specific site.

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

The concept of delayed works reducing the number of biodiversity units is flawed and should be removed from a Scottish Metric. In the planning process, delays to projects can happen that are out of a developer's control. Therefore, the requirement to add further habitat improvements to a project that has been delayed could make that project unviable and the Scottish Metric impractical to implement.

Similar to the risk factor, timescales of delivering peatland restoration are not straight forward and it is difficult to apply one simple temporal factor in a metric. Some aspects of peatland restoration reach a 'restored' state relatively quickly (such as some key plant indicator species), but other aspects take longer to stabilise (such as water table depths in drought periods). Therefore, the time taken to reach restoration is complicated and depends on which factors you are using to determine success. Also, peatlands will inherently take a long time to

restore. However, this shouldn't disincentivise developers to undertake peatland restoration at scale and this should be reflected in the Metric.

The English Metric tries to incentivise creating/enhancing the habitats in advance of works. This is difficult to do for logistical reasons, and it also misses the most important aspect of habitat management: ensure you don't negatively impact what is already present on site by doing everything all at once.

If this advice is ignored, any habitat creation/enhancement is immediately handicapped. By applying a delay multiplier, this may encourage habitat enhancement/creation to be done quickly and in a short period that could be deleterious for the site's wildlife by ignoring the principle of restoration above.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

The removal of the delay multiplier would allow habitat creation methods to be undertaken in a phased and ecologically responsible manner.

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

No.

2.9 Spatial Risk Factor

i. Do you agree with the issue(s) identified?

Yes. The spatial risk factor needs to be fully addressed in the Scottish Metric, particularly the off-site mitigation regarding local planning authority (LPA) and national character area (NCA) boundaries.

The spatial risk factor is designed to promote onsite habitat prescriptions. However, some sites are unable to deliver the required biodiversity units, and therefore a provision for off-site biodiversity units should be secured.

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

The English Metric has no negative multiplier for off-site compensation within LPA/NCA boundaries. This is fundamentally wrong and should be addressed. LPA boundaries are arbitrary from an ecological point of view, and you could have a situation where offsite mitigation is immediately adjacent to a site but in a different local authority area.

It would be helpful to understand if the Scottish Metric will ultimately be a tradeable metric to know if landowners and developers will be able to sell biodiversity units. It would also be helpful to know if the Scottish Metric will follow the English Metric in holding Biodiversity Net Gain areas for 30 years, or if another timeframe will be used.

iii. If you have idea or solutions for addressing the issues identified, please outline your approach.

The Scottish Metric should prioritise onsite habitat improvement but not disregard off-site habitat improvement. Offsite mitigation negative multipliers should be based only on distance from site and not LPA boundaries. Some sites will require off-site provision and will still contribute significantly to uplifts in biodiversity.

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

No.