



Department
for Environment
Food & Rural Affairs

Consultation on the Biodiversity Metric

Government response and summary of responses

Date: March 2023

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities, and supporting our world-class food, farming, and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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Executive summary

An 8-week public consultation on the biodiversity metric ran from 2 August 2022 to 27 September 2022. This consultation collected views on how we should update the biodiversity metric before mandatory biodiversity net gain.

We anticipate that this next version of the biodiversity metric, including the small sites metric, will form the basis of the statutory metric, for the purposes of Schedule 7A of the Town and Country Planning Act 1990 as introduced by Schedule 14 of the Environment Act 2021, once published by Defra's Secretary of State. This will become mandatory to use once it is laid before Parliament, expected to be November 2023.

Biodiversity metric changes

As a result of responses and key themes, the following key changes have been made to the biodiversity metric:

- changing the formula of the spatial risk multiplier
- providing a summary of the results on each tab in the calculation tool making it easier to follow the progress towards net gains as changes are made
- improving the formatting and user experience with additional error flags, colours, and notes within the tool to inform users of the implications of inputs
- fixing minor errors that were present in the biodiversity metric 3.1 calculation tool

We will consider the following suggestions from the consultation response within the next major update of the biodiversity metric:

- review species inclusion
- any significant changes to condition assessment sheets and methodology
- changes that would affect the biodiversity unit values in the small sites metric
- how Nationally Significant Infrastructure Projects can apply the spatial risk multiplier
- review habitat value, multipliers and trading rules using evidence as well as industry and academic findings

Themes

There were several key themes within responses to all questions in the consultation:

- supporting the creation of high-quality habitat and high standards of delivery
- ensuring metric changes are in line with existing environmental policy
- making suggestions for specific changes to the metric multipliers, including the spatial risk multiplier
- additions to metric guidance
- improving the formatting and user experience of the calculation tool
- improving how results can be summarised and reported from the calculation tool

- ensuring a consistent, and standardised approach to measuring biodiversity net gain

Overview of responses

There were 8 technical questions about short and long-term changes to the biodiversity metric. We received 220 responses to the consultation, although not all respondents answered each question. Further detail on each question can be found in Section 4: Question by question analysis.

There were 211 responses to question 1. Almost half of respondents supported changes to the spatial risk multiplier. We have made a change to the spatial risk multiplier formula.

We received 207 responses to question 2. Most respondents supported additional guidance for the considerations of habitat interventions. This guidance will not be provided within the biodiversity metric. We will work with professional bodies and training providers to support this guidance.

In question 3, we asked respondents for biodiversity metric case study suggestions. We grouped suggestions into those specific to the biodiversity metric, and those suited to general guidance. Overall, there were 208 responses, but only 162 were biodiversity metric specific case study suggestions. We will use the biodiversity metric specific suggestions to inform new metric case studies.

There were 191 responses to question 4 asking about minerals developments. Most respondents said they did not have experience working with minerals developments. We will clarify how mineral developments should apply metric multipliers through a case study.

Question 5 asked about short-term changes to components of the biodiversity metric. We received the following number of responses for each individual component:

- question 5a received 117 responses
- question 5b received 102 responses
- question 5c received 61 responses
- question 5d received 24 responses
- question 5e received 47 responses
- question 5f received 43 responses

We received 196 responses to question 6. This asked about the use of other metrics alongside the biodiversity metric. Most respondents said they wanted a standardised approach for mandatory biodiversity net gain. They felt that the biodiversity metric was the best mechanism to do this.

Question 7 covered species inclusion in the biodiversity metric. There were 205 responses to question 7a and 198 responses to question 7b. We have considered whether habitat condition criteria could be updated to take species into consideration. We will review species inclusion within the biodiversity metric for future major updates. We will consider

how the biodiversity metric can currently account for protected and locally important species.

In question 8, we asked whether users should require training or accreditation to complete the biodiversity metric. We received 206 responses. There were 137 responses supportive of either training, accreditation, or both. We will not require biodiversity metric users to have received formal training or accreditation. We would recommend biodiversity metric users are qualified in a suitable way to allow them to meet the competency requirements of using the biodiversity metric. We would also encourage biodiversity metric users to familiarise themselves with the latest version of the biodiversity metric, published by Natural England, and its associated guidance documents.

Section 1: Introduction and context

This consultation set out the purpose of consulting (Part 1), proposals for the next biodiversity metric update (Part 2), and longer-term plans (Part 3). We consulted on biodiversity metric 3.1 to inform decisions on changes to make for the next major biodiversity metric update.

Natural England will publish the next version of the biodiversity metric, including the calculation tool for biodiversity metric 4.0, the calculation tool for the small sites metric, and the associated guidance documents following this government response. At the time of publishing biodiversity metric 4.0 and this consultation response, the relevant provisions in the Environment Act will not yet be in force. Therefore, at this time, biodiversity metric 4.0 will not be mandatory to use.

We anticipate that this next version of the biodiversity metric, including the small sites metric, will form the basis of the statutory metric, for the purposes of Schedule 7A of the Town and Country Planning Act 1990 as introduced by Schedule 14 of the Environment Act 2021, once published by Defra's Secretary of State. This will become mandatory to use once it is laid before Parliament, expected to be November 2023.

This government response summarises the consultation responses and current policy positions. We have set out any changes to policy or technical aspects of the biodiversity metric.

Natural England provided technical advice for changes to the biodiversity metric and guidance. Forestry Commission and the Environment Agency provided technical advice for the tree and woodland, and river features of the biodiversity metric respectively.

Section 2: Methodology

This consultation, hosted on Citizen Space (Defra's online consultation tool), included 8 questions on short and long-term proposals for the biodiversity metric. Respondents also had the opportunity to provide feedback on the online consultation tool. Four questions

provided background information to assist with the analysis of responses. There was an additional option to submit a written response by email to the consultation team.

To analyse the consultation responses, a thematic analysis framework was developed. Analysts conducted manual coding of each response. Emerging themes were grouped for each question. The most common themes for each question were used to guide the summaries.

Section 3: Breakdown of respondents

We received 236 responses comprising 161 responses submitted through Citizen Space and 75 through email. There were 16 email responses corresponding to a duplicate Citizen Space response. Once all responses were consolidated, the final number of responses was 220.

Respondents by organisation

Table 1 shows a breakdown of respondents by organisation. There were 25% of respondents categorised into the 'Other' category, where they did not fit into one of the organisations shown in Table 1. The 'Other' category included: Government agencies and public bodies, broadcasting, campaign groups, education, law, utility companies, and wildlife conservation organisations. Developers, local authorities, and consultancies each had 15% of respondents respectively. Development industry included commercial and industrial, housebuilding and mixed. Consultancy included ecological, engineering, environmental, landscape and planning.

Table 1 Breakdown of respondents by organisation

Type of organisation	Number of respondents	Percentage of respondents
Academic	13	6%
Consultancy	32	15%
Development industry	32	15%
Digital	1	less than 1%
Individual	12	5%
Land agency	5	2%
Non-governmental organisation	27	12%

Type of organisation	Number of respondents	Percentage of respondents
Other	55	25%
Planning authority	32	15%
Professional body	11	5%
Total	220	100%

Defra held 4 stakeholder events in September 2022. Attendees gave feedback on the proposals for the biodiversity metric. There were 2 events on the consultation content, 1 on the small sites metric and 1 focusing on intertidal elements. There were attendees from local planning authorities, non-governmental organisations, developers, consultancies, professional institutes and academics. Natural England, the Environment Agency and the Forestry Commission provided technical input at the stakeholder events.

Section 4: Question by question analysis

Part 1: Overview

Part 1 of the consultation contained no questions. We set out biodiversity metric policy points and clarifications here.

Purpose of this consultation

We set out our proposed timeframes and consultation requirements for major and minor biodiversity metric updates.

A major update would be any change that affects the biodiversity metric formula, multipliers or biodiversity unit values. Following the publication of the statutory biodiversity metric in November 2023, we do not intend to make further major changes to the biodiversity metric before 2026. Further major updates will then occur every 3 to 5 years. Major changes will not be made without prior statutory consultation.

A minor update would be any change to fix any errors. These updates would not relate to the substance of the metric formula, multipliers or biodiversity unit values. We will undertake minor updates to the calculation tool to fix any errors when needed. We will communicate when we have made minor updates to ensure users are aware of the most up to date biodiversity metric.

When the mandatory requirement for biodiversity net gain is commenced, planned for November 2023, new applications in scope of the requirement will need to be submitted

with the statutory biodiversity metric. Projects in an advanced stage of the consenting process are not required to update their calculations with the latest major update of the metric. We will put in place transitional arrangements when publishing the statutory biodiversity metric in November 2023.

What is the biodiversity metric?

We clarify what constitutes the biodiversity metric. We anticipate the following package of documents, published by Natural England, will form the basis of the statutory biodiversity metric, published by the Secretary of State, for the purposes of calculating biodiversity net gain:

- commencing November 2023:
 - biodiversity metric calculation tool
 - biodiversity metric user guide
 - short data input guide
 - biodiversity metric – Technical annex 1: Condition Assessment
 - biodiversity metric – Technical annex 2: Technical information
 - small sites metric calculation tool
 - small sites metric user guide

Metric users will need to use the biodiversity metric calculation tool, or the small sites metric calculation tool where relevant, to demonstrate that they have correctly applied the biodiversity metric. By submitting a completed calculation tool, this will provide local planning authorities with confidence that the calculations presented to them comply with the biodiversity metric.

The following documents provide additional information for metric users and are for supporting purposes only:

- Frequently asked questions
- Case studies
- QGIS template
- QGIS tool
- GIS data standard

The biodiversity metric and small sites metric calculation tools are currently in spreadsheet format. We aim to make these online tools in the long term.

Small sites metric

When to use the small sites metric

We reiterate our plan to allow for a simplified small sites metric to ease the process for small site developments. Developers can choose to streamline the process for calculating biodiversity net gains for small sites by using the small sites metric calculation tool instead of the main biodiversity metric calculation tool.

Developers should note that the following criteria need to be met to use the small sites metric calculation tool:

- for residential development:
 - fewer than 10 residential units on a site area (no more than 9 units) less than 1 hectare
 - when the number of residential units is not known, the site area is less than 0.5 hectares
- for non-residential development:
 - the site area is less than 1 hectare

The biodiversity metric calculation tool must be used, instead of the small sites metric calculation tool, in all cases where:

- priority habitats (high and very high distinctiveness habitats) are within the development site:
 - this does not include the presence of some hedgerows and arable field margins – these are medium distinctiveness habitats
- protected sites are within the development site
- European protected species are within the development site

If when using the small sites metric calculation tool, there is a need for off-site units or, as a last resort, statutory credits, complete the calculation instead using the main biodiversity metric calculation tool.

Who can use the small sites metric?

Competency is aligned with the British Standard 'Process for designing and implementing biodiversity net gain: BS 8683:2021.'

The developer is responsible for selecting the competent person for completing the small sites metric. The competent person does not need to be an ecologist for the small sites metric. The Local Planning Authority does not need to verify the competent person.

A competent person is someone who can demonstrate they have acquired through training, qualifications or experience, or a combination of these, the knowledge and skills enabling that person to perform specified tasks in completing and reviewing metric calculations.

We are not proposing that training or accreditation is required for the small sites metric. As there is a limited range of habitats and scenarios in which it can be used, we believe there is much less risk of trying to include inappropriate on-site habitats.

Part 2: Proposals for the biodiversity metric

Highlighting unit shortfall

We committed to include headline results in all tabs of the calculation tool. The calculation tool will show a running total of results so metric users can see changes as edits are made.

Question 1: Spatial risk multiplier and wider value adjustments

The spatial risk multiplier incentivises off-site habitat interventions to be close to the development site impact.

Key themes in response to question 1

We received 211 responses to question 1 which asked, 'Do you think that the spatial risk multiplier values need reconsidering to better incentivise high value off-site delivery?' 106 respondents answered 'Yes', 49 respondents answered 'Do not know', 30 respondents answered 'No', 26 respondents answered 'Other.' The key themes for question 1 are set out below.

Supporting creation of high-quality habitat

There were 58 respondents supportive of incentives for creating high-quality habitats. Some respondents said that the spatial risk multiplier currently incentivises low-quality habitats further from the development site. A further 21 respondents wanted more local habitat delivery in line with the mitigation hierarchy.

Review any changes in line with existing policy

Thirty-seven respondents wanted changes to the spatial risk multiplier to be linked with other environmental policies. Four respondents specifically wanted changes to be reviewed against the trading rules. In contrast, some respondents that did not want changes to the spatial risk multiplier said that this was because existing environmental policies could be utilised instead.

Suggestions for changes to the spatial risk multiplier

As the size of local authorities varies, potentially a 'distance from site' multiplier may be more helpful. Others suggested that the spatial extent where the multiplier occurs could be broadened. The distance could also be based on empirical distances from the development.

Incentives for community access and funding for nature

Fifteen respondents that were against making changes to the spatial risk multiplier wanted any compensation to have consideration for the local area. One respondent suggested that 'the communities that pay for the compensation and experience the loss are not deprived of a nature rich environment.'

Government response to question 1

Respondents were both supportive and unsupportive of changing the spatial risk multiplier. We have changed the formula of the spatial risk multiplier in the biodiversity metric.

It was agreed that the spatial risk multiplier should be applied as a constant to the off-site unit change (the difference between the gains and the losses). Table 2 shows the how changes to the spatial risk multiplier in the biodiversity metric were made. In this example, the baseline unit value is 10, and the post-intervention unit value is 12.

Table 2 Off-site unit change journey for the spatial risk multiplier

Off-site unit change	Formula	Example formula	Example off-site unit change	Example percentage change
Without spatial risk multiplier	Post-Intervention minus the Baseline	12 minus 10	2	20%
Biodiversity metric 3.1	(Post-Intervention multiplied by the SRM) minus the Baseline	(12 multiplied by 0.5) minus 10	-4	-40%
Biodiversity metric 4.0	(Post-Intervention multiplied by the SRM) minus (Baseline multiplied by the SRM)	(12 multiplied by 0.5) minus (10 multiplied by 0.5)	1	10%

The new formula for biodiversity metric 4.0 applies the spatial risk multiplier to the overall off-site unit change by requiring the user to enter the spatial risk category for each baseline entry. By applying the formula on a line-by-line basis, any variability in spatial risk category is accounted for. In hidden cells, the calculation tool automatically applies a spatial risk multiplier to each row of the data (on a line-by-line basis, using the selected spatial risk category). This is done in the post-intervention and baseline tabs of the calculation tool. It is applied in the same way as any of the other biodiversity metric multipliers. The post-intervention and baseline tabs of the calculation tool then generates a total which will be used by the headline results page to calculate off-site net unit change.

Question 2: Supporting users in proposing realistic on-site habitats

Key themes in response to question 2

We received 207 responses to question 2 asking, 'Do you think that providing guidance on considerations for what habitats can be typically achieved on-site would be helpful?' There were 173 respondents that answered 'Yes', 20 respondents answered 'Other', 9

respondents answered 'No', and 5 respondents answered 'Do not know.' The key themes for question 2 are set out below.

Supporting higher standards of habitat delivery

One-hundred and thirty-seven respondents wanted considerations for what habitats can be typically achieved on-site included in guidance. Some respondents felt that this guidance would improve standards of habitat delivery and that nature recovery targets would more likely be met. Other respondents said that current biodiversity net gain proposals are ambitious and unrealistic. They wanted guidance to help reduce disagreements between developers and local planning authorities.

Suggestions for what to include in guidance

Some respondents wanted professional bodies to produce detailed guidance in consultation with Defra. This guidance could cover long term habitat creation, restoration, and enhancement. Any guidance should link to the biodiversity metric multipliers and trading rules. Forty-five respondents specifically mentioned the inclusion of minimum size thresholds in guidance. This is where the minimum area or length for that habitat to be successfully delivered is specified. Several academics proposed that these 'minimum size thresholds should be based on empirical analysis of the biodiversity value of habitat patches of different sizes, and that studies are currently in progress.' Other respondents said that providing this information would 'avoid lots of ineffective small parcels or island habitats.'

Considerations for producing on-site habitat guidance

- 11 respondents said it should consider local perspective
- 10 respondents said it should align with existing and proposed environmental policies such as Local Nature Recovery Strategies
- 9 respondents said it should highlight the need for expert ecological advice when considering what habitats could be achieved on-site
- 9 respondents said that research and evidence should support guidance
- 6 respondents highlighted that there was a skills shortage within the ecology sector

Others wanted the practicalities of habitat interventions to be considered. Particularly those that should not be considered if they would not deliver effective biodiversity in certain settings. Some respondents provided issues to look for when designing and scrutinising proposals to ensure optimal benefit for biodiversity in practice.

Building guidance into the calculation tool

Thirty respondents wanted guidance built into the calculation tools. Some wanted the calculation tool to flag minimum viable areas of habitat creation. Others requested a habitat degradation factor within the calculation tool. Academics also said that the calculation tool should address the impacts of recreation disturbance. Others wanted the calculation tool to favour larger areas of habitat, rather than summing smaller areas.

Government response to question 2

We want to help metric users propose realistic on-site habitats. We also want local planning authorities to be confident that proposed interventions are likely to succeed.

We will not use the biodiversity metric to share guidance for on-site habitats. The biodiversity metric is not designed to provide ecological advice for habitat interventions. The calculation tool can highlight what could be possible based on habitat type and condition. Ecological knowledge, existing best practice and guidance should be used to indicate what habitat interventions are actually feasible. We will work with professional bodies, training providers, and industry to create additional guidance, separate to the biodiversity metric. We intend to make this guidance light-touch, user friendly and streamlined.

Biodiversity metric guidance

There have been updates to the biodiversity metric guidance documents. The new documents are based on existing guidance for biodiversity metric 3.1. We have removed duplication within and across documents and condensed information where necessary. The updated documents will provide the same level of support to metric users and reviewers.

To effectively apply the biodiversity metric, we would recommend users familiarise themselves with the following guidance documents:

- biodiversity metric user guide
- short data input guide
- biodiversity metric – Technical annex 1: Condition Assessment
- biodiversity metric – Technical annex 2: Technical information
- small sites metric user guide

Question 3: Case studies

Key themes in response to question 3

We received 208 responses to question 3 asking, 'Do you have any suggestions for additional case studies that we should produce?' Out of the responses, 162 respondents answered 'Yes', 35 respondents answered 'No', and 10 respondents answered 'Do not know.'

All suggestions we received are set out below. Suggestions are grouped into:

- case study suggestion to consider producing (Table 3)
- case study suggestion more suitable as general guidance (Table 4)

Table 3 Considerations for biodiversity metric case studies

Case study suggestion	Suggestion group	Number of suggestions
Urban	Habitat type	23
Solar farms	Development type	22
Forest gardens and underplanted orchards	Habitat type	21
Minerals	Development type	18
Rivers and streams	Habitat type	17
Schemes covering multiple local planning authorities	Development type	15
Phased development	Development type	14
Intertidal	Habitat type	12
Small sites metric	Development type	10
Nationally significant infrastructure projects	Development type	9
Estuary	Habitat type	7
Habitat banking	Biodiversity net gain process	6
Residential development	Development type	6
Other renewable energy development	Development type	6
Roof gardens	Habitat type	5
Strategic significance	Biodiversity net gain process	4

Case study suggestion	Suggestion group	Number of suggestions
Open mosaic habitat	Habitat type	4
Brownfield sites	Development type	3
Like-for-like replacement of farmland and open space habitat	Habitat interventions	3
Rewilding and reintroduction	Habitat interventions	3
Trading rules	Biodiversity net gain process	2
Commercial	Development type	2
Change of use applications	Development type	2
Underground and overhead development	Development type	2
Sustainable farming systems	Development type	2
Restored landfill sites	Development type	2
Industrial development	Development type	2
Rural commercial development	Development type	2
Coastal habitats	Habitat type	2
Marine	Habitat type	2
Soils	Habitat type	2
Arable	Habitat type	2
Pasture	Habitat type	2
Woodland	Habitat type	2

Case study suggestion	Suggestion group	Number of suggestions
Garden village and communities	Development type	1
Water industry	Development type	1
Household applications	Development type	1
Modified grassland	Habitat type	1
Rural trees	Habitat type	1
Hedgerow	Habitat type	1
Peatland bog	Habitat type	1

Table 4 Considerations for general biodiversity net gain guidance

Guidance suggestion	Suggestion group	Number of suggestions
Additionality	Policy	18
Irreplaceable habitat (and high or very high distinctiveness habitat)	Habitat type	16
Good versus bad practice	Policy	6
Creation or enhancement of habitats that are difficult to create	Habitat interventions	6
Stacking	Policy	3
Mitigation hierarchy	Policy	1
Minimum thresholds	Habitat interventions	1
Species features	Habitat interventions	1
Locally specific case studies	Habitat interventions	1

Government response to question 3

Suggestions suitable for case studies (Table 3) will be considered and published by Natural England periodically. Other suggestions that were not relevant to the biodiversity metric, but useful for biodiversity net gain implementation, will be considered by Defra when drafting biodiversity net gain implementation guidance (Table 4). We intend to make this guidance light-touch, user-friendly and streamlined.

Question 4: Minerals developments

Key themes in response to question 4

We received 191 responses to question 4 asking, 'Do you agree with the described measures and proposals to help with applying the metric to minerals developments?' Out of the responses, 99 respondents answered 'Do not know.' Most stated that this was because they did not work with or have experience working on minerals developments. Fifty-two respondents answered 'Yes', 20 respondents answered 'No', and 19 respondents answered 'Other.' The key themes for question 4 are set out below.

Providing additional guidance for minerals

Eighteen respondents provided considerations for additional guidance. Most wanted any guidance to be included within the biodiversity metric user guide or planning practice guidance. Some respondents suggested that this guidance should accommodate a phased approach. Others wanted changes to the trading rules to accommodate other natural capital considerations.

Minerals specific changes to the calculation tool

Some respondents wanted to change the calculation tool rather than guidance. This included agreeing alternative multipliers or specific mineral habitat values with local planning authorities. One respondent felt that 'the existing metric, with the delay function is fit for the minerals industry, with the addition of a delay in destruction multiplier to better align with phasing.' In contrast, 3 respondents had concerns about the scope a local planning authority could agree different multipliers for certain applications.

Against a specific method for minerals developments

Some thought that the existing multipliers could already work for minerals. Fifteen respondents did not support a specific minerals method. One respondent stated that 'these habitats have the same degree of difficulty to create on mineral sites as they do in other development.' For the biodiversity metric to be robust, others thought it should have the same application for all habitats and developments.

Biodiversity net gain should be additional to minerals restoration

Fourteen respondents made general comments about the additionality of minerals restoration. Several academics said that 'minerals developments already remediate their

land as ordinary practice, and many of the UK's best wildlife sites are remediated minerals sites.'

Government response to question 4

We said we would provide greater scope for deciding appropriate multipliers for minerals. There is an existing biodiversity metric rule that may permit deviation of the biodiversity metric methodology in exceptional ecological circumstances, by the relevant consenting body or planning authority. The requirements for this rule are set out in the biodiversity metric user guide. We will also set out how mineral developments should apply the biodiversity metric using the calculation tool in a separate case study.

Question 5: Further improvements for biodiversity metric 4.0

We received 137 responses for question 5 asking, 'Are there any improvements you would make to the following components in the short-term, regarding user friendliness, simplicity, or function?' Respondents set out which component of the calculation tool they were providing feedback on:

- question 5a: The metric calculation tool
- question 5b: The user guide
- question 5c: Condition assessment sheets
- question 5d: Geographic Information Systems import tool
- question 5e: Case study changes
- question 5f: Small sites metric

Natural England will publish a document summarising the changes made from biodiversity metric 3.1 to biodiversity metric 4.0.

Key themes in response to question 5a

There were 117 responses providing feedback on the biodiversity metric calculation and tool.

Proposed changes to habitat values

Thirty-three responses suggested specific changes to habitat values including:

- clarity of what category to use on certain habitats (for example, tall ruderal)
- changing distinctiveness categories for certain habitats by either increasing or decreasing
- introducing a rural tree calculator alongside the street tree calculator
- capturing mosaic and ecotone habitats better
- ensuring all habitats to align with UK Habitats Classification definitions
- clarity on whether habitat interventions are enhancement or creation

Formatting and ease of use

Thirteen respondents wanted the current calculation tool moved to an online platform. A further 33 respondents provided suggestions on formatting the tool to make it easier to use:

- add a 'freeze cell' function to view habitat information
- add column names to reference specific cells
- add a conversion tool for units of measurement
- add the option to add or delete rows
- add the option to export to PDF
- change the condense rows function to show all input information

Reporting and results

Some respondents wanted better summary information within the results pages. This would help with local planning authority reporting. Suggestions included:

- showing retained and enhanced units compared to the baseline to help planning officers check whether users have followed the mitigation hierarchy
- showing the number of units required to achieve the relevant biodiversity net gain percentage within the 'headline results' tab
- adding a 'summary for reports' tab to the results options

Government response to question 5a

We prioritised suggestions of short-term updates to formatting and ease of use. Other suggestions for habitat multipliers and values were added to long-term considerations. We are working with the UK Habitat Classifications team to ensure that habitats are aligned with the biodiversity metric.

Impacts to irreplaceable habitats cannot be accounted for in the biodiversity metric. Where there are no losses and deterioration of irreplaceable habitats, their enhancement may contribute towards BNG delivery. Further detail on how to consider irreplaceable habitats within your development is provided in [Protected sites and areas: how to review planning applications](#).

There will be secondary legislation that sets out which habitats are considered irreplaceable for the purposes of BNG, and therefore not subject to the BNG requirement. We are planning to publicly consult on the definition of irreplaceable habitat and whether the National Planning Policy Framework should be updated in line with this proposed definition. This consultation is expected to be published within the same timeline as the draft secondary legislation.

We are aware that some local authorities and other metric users think it is helpful if the biodiversity metric acknowledges the presence of any irreplaceable habitats upfront. The biodiversity metric calculation tool includes a new tab which will require metric users to

record all irreplaceable habitats present on-site. The habitat type, extent (area or length), and post-intervention status (retained, enhanced, impacted) will need to be recorded.

Key themes in response to question 5b

There were 102 responses providing feedback on the biodiversity metric user guide.

Clarifications to existing information

Thirty respondents made suggestions for clarifications to be made to existing information, including requests to:

- define what 'sufficiently local' means for the spatial risk multiplier
- clarify that any deviations from biodiversity metric methodology should be agreed with the consenting body
- clarify whether high and very high distinctiveness habitats are irreplaceable
- clarify mapping requirements

Additions to the updated user guide

Twenty-two respondents made suggestions for additions that could be made to the user guide, including requests to:

- include troubleshooting guidance for common calculation tool errors
- make use of the mitigation hierarchy clearer in guidance
- include more emphasis on retaining medium and high distinctiveness habitats over unacceptable losses
- introduce the ability to merge habitats of the same type and condition
- include diagrams and flow diagrams to break up information
- provide further detail on trading rules
- provide information on how to undertake non-urban tree assessments

Further suggestions for biodiversity net gain guidance

Thirteen respondents provided suggestions that were better suited for general guidance rather than biodiversity metric guidance, including:

- habitat fragmentation and why it is important to avoid
- when professional judgement can override the results generated by the calculation tools

Government response to question 5b

We have updated the guidance documents to improve formatting, remove duplication, and provide clarifications where required. To effectively apply the biodiversity metric, we would recommend users familiarise themselves with the guidance documents set out in Part 2: Biodiversity metric guidance.'

Key themes in response to question 5c

Sixty-one respondents provided feedback on the condition assessment sheets.

Comments on specific habitats

Thirty-two respondents provided general comments on specific habitats:

- include light spill as a condition consideration
- consider how invasive species management can impact condition scores
- provide better options for low distinctiveness ruderal habitats
- separate urban habitats into separate condition assessment sheets
- explain the difference in native and naturalised species and whether both can count towards condition criteria
- explain how combined features can achieve good condition (for example, hedges with an adjacent ditch in shade)
- clarify how some habitats criteria may lead to double counting and a higher condition criteria being achieved

Condition assessment sheet formatting

Eighteen respondents provided comments on the condition assessment sheet formatting:

- improve functionality to use as on-site survey proformas
- provide a drop-down or free text option to add habitat type into
- include hyperlinks from the calculation spreadsheet to the technical supplement

Government response to question 5c

Condition assessment sheets have been based on several established methodologies. These include technical discussions with steering groups. These are not a replacement for ecological professional judgement.

We have clarified when 'fairly poor' and 'fairly good' condition categories can be used in the updated biodiversity metric guidance documents. In the condition assessment sheet, it states that these categories 'should not be used except in extenuating circumstances.' The error flag in the calculation tool has been mirrored to reflect this update. The metric user should provide justification and reference any additional criteria achieved.

Following this consultation, we have made minor changes to the condition assessment sheets. Suggestions that would need significant changes to habitat categories, values and the condition assessment methodology require additional habitat information to be collected over 3 to 5 years. We will therefore consider any significant changes in the next major update.

Key themes in response to question 5d

Twenty-four respondents provided feedback on the Geographic Information Systems (GIS) data import tool.

Formatting and ease of use

Fifteen respondents provided comments on how easy the GIS data import tool is to use as well as formatting. Several respondents wanted the GIS data import tool to be applied to the small sites metric.

Known consolidation errors

Some respondents highlighted existing errors with the GIS tool that should be fixed. Some respondents said that the import tool comes up with an error when consolidating some habitat data. Others highlighted that the consolidate data function erases data when carrying information over to the biodiversity metric calculation tool.

Government response to question 5d

We have fixed known errors with the consolidate function within the GIS data import tool.

Key themes in response to question 5e

There were 47 responses providing feedback on case studies. Further suggestions were made for additional case studies which have been combined with responses to question 3.

Formatting of case studies

Eight respondents made comments on how the case studies are formatted and how they are currently used. Respondents wanted more images to make case studies more accessible.

Government response to question 5e

Natural England will consider the suggestions from this consultation when producing new biodiversity metric case studies. Suggestions for formatting from question 5e will be considered before new case studies are published.

Key themes in response to question 5f

Forty-three respondents provided feedback on the small sites metric.

Changes to how habitats are input

Six respondents made comments on improvements for how habitats are input into the small sites metric, including:

- adding a new error flag for when the same number of trees lost as retained is input

- correcting certain multipliers (including difficulty of creating hazel scrub)
- ensuring that any automatic generated aspects of the small sites metric calculation tool align with the biodiversity metric calculation tool

Others asked for the condition of any habitat creation to be set at 'poor' or 'moderate' only. This is to make sure that habitat creation for small sites is precautionary.

Formatting and ease of use

Six respondents made specific formatting comments. Some wanted text to be fully visible within the relevant cell. Others wanted clarification on whether the calculation tool automatically rounds figures to one decimal place.

Clarity on development requirements for using the small sites metric

Many respondents wanted clarification on when to use the small sites metric, including clarification on how to interpret the residential development requirements.

Clarity on competency requirements

Some respondents wanted clarification that the need for training or accreditation is not required for the small sites metric. Some responses suggested that an experienced user of the biodiversity metric calculation tool does not need separate training for the small sites metric calculation tool. A failure to clarify this may result in local planning authorities insisting on users of the small sites metric to be fully trained even though ecological expertise is not required.

Government response to question 5f

We have clarified when and who can use the small sites metric in Part 1. This is also clarified in the small sites metric user guide.

We have made minor changes to the small sites metric. Any automatically generated aspects of the small sites metric calculation tool now align with the biodiversity metric calculation tool. Suggestions for changes that would affect the biodiversity metric formula, multipliers, or biodiversity unit values will be considered for the next major update.

Question 6: Other biodiversity metrics

We received 196 responses to question 6 asking 'Do you think there are other biodiversity metrics that should be considered alongside biodiversity metric 3.1 for measuring mandatory biodiversity net gain?' There were 20 campaign responses using standard text. Eighty-four respondents answered 'Do not know', 46 respondents answered 'No', 34 respondents answered 'Yes – for both Town and Country Planning Act 1990 and Planning Act 2008 developments', 30 respondents answered 'Other', 3 respondents answered 'Yes – for Town and Country Planning Act 1990 development.'

Key themes in response to question 6

Preference for a consistent biodiversity net gain approach

Forty-eight respondents supported the current biodiversity metric and for there to be one standardised approach. Some respondents said that using alternative metrics would be confusing for users and reviewers. It could also impact the market and affect the confidence from market stakeholders. One respondent suggested that ‘there should be freedom in future updates to add other habitats and change multipliers.’ Twelve respondents said that having one metric would ‘reduce the burden on developers.’

Support for working with other metrics

Twenty-nine respondents supported the use of other metrics alongside the biodiversity metric. Respondents suggested the following existing metrics could be used alongside the biodiversity metric:

- The Biodiversity Intactness Index
- The North Somerset and Mendips bat Special Area of Conservation Metric
- Woodland Carbon Code
- Environmental Benefits from Nature Tool
- Sustainable Food Trust Global Metric
- Urban Greening Factor

Government response to question 6

Other metrics that measure other aspects of biodiversity, such as species, can supplement but not replace a completed biodiversity metric calculation tool or small sites metric calculation tool. Examples provided in response to this question will be helpful for future biodiversity metric updates in line with ecological evidence. However, they were not considered to be a suitable replacement for biodiversity metric 3.1 (consulted on at the time).

We will publish the Defra Secretary of State’s statutory biodiversity metric for biodiversity net gain when the relevant provisions of the Environment Act come into force in November 2023. This will be applicable for Town and Country Planning Act 1990 development.

The statutory biodiversity metric will also be applicable to Nationally Significant Infrastructure Projects (NSIPs) when the requirement for these projects commences in 2025. We recognise there is a concern on how to apply the biodiversity metric for NSIPs, and other large, linear schemes that cover multiple local authorities. It is not our intention to alter the biodiversity metric multipliers or produce an alternative biodiversity metric specifically for NSIPs. We will be creating guidance for these types of projects and would like to work directly with these projects to produce specific case studies.

There may be flexibility, as with all developments, to use the biodiversity metric rule that may permit deviation of the biodiversity metric methodology in exceptional ecological

circumstances, by the relevant consenting body or planning authority. The requirements for this rule are set out in the biodiversity metric user guide. We may review this decision if we receive feedback that this does not accurately apply to NSIPs. Any changes required would only be applied in the next major update.

Part 3: Proposals for future major updates

Timeframes for updates

The proposed timeframes for biodiversity metric updates are summarised in Part 1: Overview.

We will consider the following suggestions from the consultation response within the next major update:

- review species inclusion
- any significant changes to condition assessment sheets and methodology
- changes that would affect the biodiversity unit values in the small sites metric
- how NSIPs can apply the spatial risk multiplier
- review habitat values, multipliers and trading rules using evidence as well as industry and academic findings

Habitat value, multiplier, and trading rule adjustment

We set out in the consultation that we will use ecological evidence and feedback to ensure the biodiversity metric continues to deliver for nature's recovery and metric users. We will continue to use ecological evidence as well as industry and academic findings to review the formulae and values of the biodiversity metric. We have also considered suggestions from responses to question 5 that we felt were more suitable as long-term changes. These will be considered over the next 3 to 5 years before the next major update.

Questions 7a and 7b: Species

Key themes in response to question 7a

We received 205 responses to question 7a asking 'Do you have any practical suggestions on how we could use species or other ecological data to improve the measuring of losses and gains in the metric?' Eighty respondents answered 'Yes', 42 respondents answered 'Do not know', 38 respondents answered 'Other', and 32 respondents answered 'No.'

Creating an additional metric multiplier for species

Some respondents suggested that a habitat that is essential for a particular species could score higher than an equivalent habitat that does not have this associated species interest. Some felt that species could be factored into the condition assessment criteria. One respondent said that 'it seems illogical that a habitat site can be 'poor' or 'moderate' condition when protected species are present.'

One respondent suggested using survey data to influence the strategic significance score. Some respondents suggested using a similar approach to the international development concept of 'critical habitat' for habitat distinctiveness. Other ecological data suggested were species abundance data (for example environmental DNA from soils and water) and modelled and sample species distributions.

Did not want changes to the calculation tool to incorporate species

Others felt no changes to the calculation tool were required. Eleven respondents thought changes could be made to biodiversity metric guidance to highlight how it could already be applied for species. Eight respondents felt that existing environmental policy could be used alongside the biodiversity metric to incorporate species.

Key themes in response to question 7b

We received 198 responses to question 7b asking 'Do you have any practical suggestions on how we could use species or other ecological data to improve designing habitat enhancements?' Out of these responses, 102 respondents answered 'Yes', 30 respondents answered 'Other', and 26 respondents answered 'No' and 'Do not know' respectively.

Suggestions for ecological data to use

Some respondents provided examples of ecological data that could be used to improve the design of habitat interventions. One respondent mentioned 'the mosaic approach' to contribute towards habitat structure, complexity, and condition. Other respondents referenced a separate requirement for ecological enhancement like the Building Research Establishment Environment Assessment Method (BREEAM) approach.

Changing guidance rather than the calculation tool

Similarly, to question 7a, 14 respondents felt that using the existing biodiversity metric would be better than making specific changes. Six other respondents said that existing guidance and policy would be better than changing the calculation tool. Others said that producing habitat intervention guidance would be a more viable approach. They stated that habitat enhancement could be tailored for protected and notable species.

Government response to question 7a and 7b

We want the biodiversity metric to be able to measure biodiversity gains and losses easily. We think that using habitat as a proxy measure would provide the best practical option to do this.

We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric. We are instead looking at how we could require information on these through the biodiversity gain plan. Incorporating the reporting of these features into biodiversity gain plans will allow local planning authorities to consider what conditions in relation to those features may be appropriate.

Within the scope of the biodiversity metric, we have considered whether habitat condition criteria could be updated to take species into consideration, and how it can account for protected and locally important species. We will review species inclusion for future major updates.

Question 8: Competency

Key themes in response to question 8

We received 206 responses to question 8 asking ‘Do you think that metric users should be required to attend a verified training course or be accredited before completing the calculation?’ There were 137 respondents supportive of training or accreditation, which was further broken down into the following:

- 101 respondents wanted both (training and accreditation)
- 25 respondents wanted a verified training course
- 11 respondents wanted accreditation only

Twenty-nine respondents answered ‘Other’, 28 respondents answered ‘No’, and 12 respondents answered ‘Do not know.’

Providing a consistent approach

Out of those that were supportive of training or accreditation, 11% felt this would provide a consistent approach for completing the calculation tool. It could provide confidence for local planning authorities when reviewing calculation results. Others suggested that completing a certain number of biodiversity metric calculation tools could lead to accreditation.

Different competency requirements for metric users and reviewers

The different competencies required for metric users and reviewers and the different training requirements this presents was noted by 9% of respondents. Some respondents preferred that metric users attend a training course, and that the final calculation tool is signed off by an accredited reviewer. This would therefore not require all users to be accredited which may be unreasonable.

Involvement of professional bodies or other providers

Respondents also wanted professional bodies, including the Chartered Institute of Ecology and Environmental Management (CIEEM), to be involved. Some respondents suggested that any training or accreditation should not be limited to one body. Many universities already offer surveying courses which can be studied alongside a part-time job. This was related to other comments about ensuring training and accreditation is as accessible as possible. We suggested that a similar approach to BREEAM could be used for training or accreditation. One respondent said that CIEEM may be better placed to set this out.

The need for habitat skills which cannot be taught in a short training course

Twenty-five respondents said that whilst a training course for use of the biodiversity metric calculation tool would be helpful, they recognised that there were certain habitat skills that cannot be taught from a training course alone. Other considerations were the ecology skills gap, skills required for undertaking habitat surveys, and designing habitat interventions.

Feasibility of mandating training or accreditation

Some said improving guidance would be better than mandating training or accreditation. There were 5% of respondents that said use of the calculation tool could be self-taught. This was a similar view to others that thought making it optional would be more suitable. Another consideration was that requesting training or accreditation may not be feasible for small businesses. Some felt that attendance should be free if mandated.

Proposed timeframes for training

There was support from several respondents for a phased approach based on a realistic timeframe for introducing verification. This would aim to avoid any additional burden or delaying implementation of planning permissions. Some respondents noted the time lag between mandatory biodiversity net gain and a requirement for training or accreditation. Some mentioned the support and funding that local authorities will need for calculations to be checked with the right ecological expertise between mandatory BNG and a training and accreditation scheme being in place.

Government response to question 8

We want local planning authorities to be assured when reviewing calculations that the proposed habitat interventions are realistic. We also want a consistent approach for completing the biodiversity metric calculation tool.

We will not require metric users to have received formal training or accreditation. We would recommend metric users are qualified in a suitable way to allow them to meet the competency requirements of using the metric. We would also encourage metric users to familiarise themselves with the biodiversity metric guidance documents, set out in 'Biodiversity metric guidance.'

We have clarified the competency requirements for the biodiversity metric and small sites metric. These have also been set out in the user guides. We have aligned the biodiversity metric definition of a competent person with the British Standard on 'A process for designing and implementing biodiversity net gain' (BS 8683). A competent person is someone who can demonstrate they have acquired through training, qualifications or experience, or a combination of these, the knowledge and skills enabling that person to perform specified tasks.

The rivers and streams condition assessment has existing training and accreditation requirements. We are not intending to change these requirements. Therefore, for the

rivers and streams condition assessment, a competent person is defined as someone who has both of the following requirements:

- completed the necessary training
- achieved the necessary accreditation