

## Net Gain Consultation Proposals

*Consultation Response from the Institution of Environmental Sciences (IES), February 2019*

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### 1. Background

1.1 The Institution of Environmental Sciences is a membership organisation that represents professionals from fields as diverse as air quality, land contamination, ecology and education, wherever environmental work is underpinned by science. The organisation leads debate, dissemination and promotion of environmental science and sustainability, and promotes an evidence-based approach to decision and policy making. The Institution stands up for science, scientists and the natural world. Many of its members are Chartered Environmentalists, Chartered Scientists or both.

1.2 The IES is also the parent organisation to two communities of specialists, the Institute of Air Quality Management (IAQM), for scientists and practitioners engaged in the monitoring, modelling and management of air quality, and the Committee of Heads of Environmental Sciences (CHES) which serves as the Institution's Education Committee.

### 2. Response

2.1 The Institution of Environmental Sciences has already joined several other professional bodies who have submitted a joint response to this Consultation, under the auspices of the Environmental Policy Forum. However, in addition to that response, the Institution wishes particularly to respond further on several aspects.

2.2 In general terms, the Institution welcomes the proposals to try to halt the decline of biodiversity in the United Kingdom by requiring improvements in biodiversity whenever new developments are proposed. Through the application of sound science at every stage of a development – master planning, detailed design, construction and associated planting, and maintenance, it should be possible to benefit ecology and wildlife, to conserve and extend existing high quality habitats and to improve those in poor condition. This is essential as these natural resources underpin a healthy society and economy. The achievement of this net gain will require partnerships between *inter alia* landowners, developers, environmental specialists, local and national government.

2.3 The Institution particularly welcomes the intention to standardise the approach to Biodiversity Net Gain across different Local Authorities, as this will assist in preventing the fragmentation of valuable habitats that has characterised some recent initiatives. It should militate against adverse biodiversity and other impacts simply being unintentionally exported to adjacent geographical areas. It is also consistent with the approach established in the UK's Twenty-Five Year Environment Plan. Some further attention needs to be

paid to the treatment of development proposals that span two or more local authorities, but overall the proposal for a national approach is welcomed.

2.4 The Institution is particularly keen to see further exploration of the concept of Environmental Net Gain, rather than an emphasis only on biodiversity net gain. Reference to this is included in the consultation. The Institution promotes an holistic approach to our natural and managed environment, where consideration of ecology and conservation is accompanied by reflection on the proposed development's impact on the state of soils, surface and groundwater, air quality and climate change. Waste and energy management is also important. Such complex impacts can play out at local, regional, national and international level. This will require development of more sophisticated metrics, where the Biodiversity metric is matched by other metrics covering the full range of environmental parameters. Such consideration is required to ensure the long term sustainability of our agricultural systems, protected areas (including SSSIs and National Parks) and health and human wellbeing.

2.5 The Institution would welcome more detail on how relevant environmental data will be made readily accessible to all stakeholders in the planning system, including environmental scientists. Many local authorities currently lack the scientific expertise to manage this type of work at an appropriate level, even in assembling appropriate environmental information for local planning consultations, and there is a danger that appropriate information will be overlooked in attempting to consider what are innately complex environmental systems. We would be pleased to work with you on exploring further this aspect of the proposal.

2.6 Reference is made to the potential costs of implementing this approach to biodiversity. As evidence is now building on the benefits of a high quality and 'green' natural environment to human health and wellbeing, the Institution is of the view that any consideration of overall costs for 'biodiversity net gain' should consider wider gains, such as the potential improvements in air quality on human health (including mental health), and consequent reductions in the economic and societal burden on health and wellbeing services.

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On behalf of the Institution of Environmental Sciences

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