

## **IES Comments on the Draft British Standards Institution Standard - Process for designing and implementing Biodiversity Net Gain**

*These comments were submitted via the BSI's online consultation process through its website.*

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### **Comment #1: Section 3.6 - Competent Person should have understanding of environmental considerations**

#### **3 . 6 competent person**

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person who has acquired through training, qualifications or experience, or a combination of these, the knowledge and skills enabling that person to perform a specified task

[SOURCE: BS ISO 17842-1:2015, 3.6 ]

#### Comment:

As later sections require considerations about social and environmental factors to be made by competent persons, this section should include a note to clarify that these persons will need to be able to appreciate those factors in addition to what would ordinarily make a person competent.

#### Proposed change:

INSERT AS NOTE BEFORE SOURCE “Note: For the purposes of achieving Biodiversity Net Gain, relevant training, qualifications or experience should give the competent person an appreciation of all relevant social and environmental considerations linked to Biodiversity Net Gain.”

## Comment #2: Section 5.1.1.1 - Must address negative environmental impacts as well as negative social impacts

5 . 1 . 1 . 1 Document the commitment to Biodiversity Net Gain

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The project team shall record a commitment for the project to achieve BNG within key project documentation, such as the vision, purpose and/or objectives of the project.

The commitment to achieving BNG shall include implementing the BNG Good Practice Principles [N1], especially application of the mitigation hierarchy throughout the project lifecycle with an appropriate emphasis on avoiding impacts on biodiversity.

The commitment shall include a numeric or percentile target for BNG, as well as the long-term management and maintenance of the targeted BNG outcomes with resourcing and funding. The driver(s) for BNG shall be referenced, such as a company's voluntary commitment or a policy requirement.

The commitment shall describe any biodiversity features for which BNG outcomes cannot be achieved and are outside scope of BNG, but for which the project's impacts shall be avoided as far as possible.

The commitment shall also include addressing any negative impacts on people from BNG whilst maximizing opportunities for BNG to generate positive social outcomes.

The project team shall communicate the commitment to achieving BNG to relevant organizations within the project's supply chain, and to stakeholders as appropriate.

### Comment:

For coherence with Principle 9 of the Good Practice Principles and environmental objectives laid out elsewhere in the standard, this section should include a reference to ensuring environmental outcomes as well.

### Proposed change:

IN PARAGRAPH 5, INSERT "or the environment" AFTER "negative impacts on people"; INSERT "and environmental" AFTER "generate positive social"

### **Comment #3: Section 5.2.2.5 - Consultation of stakeholders should include environmental stakeholders**

5 . 2 . 2 . 5 Consult stakeholders

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Evidence shall be documented that stakeholder input informed the BNG design.

*NOTE For small-scale projects, this could be reference to local plan priorities and/or feedback from the local planning authority as part of the planning permission application.*

*For larger-scale projects, this could be including BNG as part of existing consultations on the project, or engaging local interest groups for the BNG design and its feasibility testing (see 5.2.2.6).*

#### Comment:

For coherence with Principle 9 of the Good Practice Principles and environmental objectives laid out elsewhere in the standard, the note to this section should refer to environmental stakeholders, and particularly the Nature Recovery Networks and Strategies which are likely to be an increasingly important tool for securing Biodiversity Net Gain.

#### Proposed change:

INSERT IN NOTE “including Nature Recovery Strategies and Biodiversity Action Plans” AFTER “local plan priorities”, ALSO INSERT “and environmental” AFTER “or engaging local”

## Comment #4: Section 5.2.2.6 - Sustainable drainage as an example of incorporating climate change resilience into BNG

### 5.2.2.6 Design BNG

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If more than one design is appropriate for achieving the BNG targets, the decision on the final design for BNG shall be documented and justified.

Design measures to achieve the BNG targets shall be documented and justified with reference to published good practice for:

- a) enhancing the specific biodiversity features and then their long-term management, maintenance and monitoring; and
- b) designing BNG.

*NOTE Design measures for BNG and their justification could include the following:*

- a) Achieving BNG by enhancing the condition of existing habitat

*The baseline assessment of habitat condition is presented with details as to why the condition was not optimal and/or degraded, and the specific interventions proposed to improve condition. Users of the Natural England Biodiversity Metric could present the habitat condition baseline assessment, highlighting the "failed" criteria and setting out interventions to address these "failed" criteria so that condition improves over time.*

*Justification is given if the BNG target is achieved but there is a loss of habitat cover, for example a project results in the loss of woodland and achieves BNG by enhancing existing woodland nearby.*

- b) Achieving BNG by creating new habitat

*Achieving BNG by creating new habitat can be the optimal design for habitats that are geographically scarce or rare.*

- c) Achieving BNG on-site, nearby or further away

*The location of BNG measures is described and justified based on good ecological practice. For example, the location could depend on the home ranges of species affected by habitat loss at the project site or a place-specific ecological function. Alternatively, a project's BNG measures could be located off-site where they generate landscape-level conservation benefits or when the net gains for biodiversity could be better secured off-site because on-site habitat creation will be within a highly used public space.*

- d) Other enhancement measures

*Biodiversity enhancement measures that contribute towards meeting the project's BNG targets, but are outside the scope of a metric, are described and quantified. For example, installing nesting boxes and hibernacula within a newly created woodland to encourage wildlife.*

- e) Climate change resilience

*Measures to incorporate climate change resilience into the BNG design are presented.*

- f) Addressing direct impacts on people from losses and gains in biodiversity

*Losses and gains in biodiversity from a project can directly affect people, both negatively and positively. For example, when people incur negative impacts from habitat loss at the project site (such as loss of green space) but live too far from the biodiversity offset to benefit from it, or, when BNG is achieved within the footprint of a new housing development and the residents benefit from enriched natural surroundings. Direct impacts on people from the design of BNG should be accounted for, with the negative impacts addressed and the positive impacts realized where possible.*

- g) Adding BNG measures as extras to mitigation measures

*Where measures to mitigate a project's biodiversity direct or indirect impacts are undertaken, it can be practically and ecologically suitable to include the BNG measures at the same site (but only when the BNG measures are clearly additional, see 5.2.2.9).*

### Comment:

For consistency with other examples given throughout the section, and to assist in clarifying this example in particular, note (e) should refer to sustainable drainage

systems as one type of enhancement which also incorporates climate change resilience.

Proposed change:

INSERT AT END OF NOTE E): “For example, the inclusion of sustainable drainage systems in some projects may create habitat and increase resilience to the effects of climate change.”

## Comment #5: Section 5.2.2.7 - Loss of habitat should explicitly be justified from an environmental perspective

5 . 2 . 2 . 7 Account for change in habitat cover

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Losses and gains in cover of habitat shall be presented alongside the results from a biodiversity metric. When BNG is expected to be achieved but habitat cover is reduced, this shall be justified from ecological, social and environmental perspectives.

*NOTE 1 For example, when a project causes the loss of habitat and achieves BNG by enhancing existing habitat, this reduction in habitat cover within the locality shall be justified.*

When BNG is expected to be achieved and habitat cover is increased, this shall also be justified from ecological, social and environmental perspectives.

*NOTE 2 For example, when a project causes the loss of woodland and achieves BNG by creating new and larger areas of woodland nearby the site of habitat loss, in order to support targets in the local Biodiversity Action Plan to increase woodland cover within the locality.*

### Comment:

To clarify the comment so that it fully reflects the detail of the clause above, the note should include explicit reference to what the justification will include.

### Proposed change:

INSERT AT END OF NOTE 1: "including reference to other relevant ecological, social, and environmental objectives."