TECHNICAL CONSULTATION ON THE BIODIVERSITY METRIC - WRITTEN RESPONSE TEMPLATE			
Part 2		**Response (delete as appropriate)**	**Provide details of your reasons for this answer**
Question 1 (Question 5 in Citizen Space (CS))	Do you think that the spatial risk multiplier values need reconsidering to better incentivise high value off-site delivery?	No (provide details of your reasons for this answer)	It is likely to be politically unfavourable for development impacts within one local authority area to fund the creation of habitats outside of that local authority area. The current weighting of the spatial risk factors encourages local delivery of compensatory habitats. However, there may be some scope to integrate/link up this risk factor with the 'spatial significance' multiplier with regards to forthcoming LNRS. If compensatory habitats are delivered outside of the local authority area, but explicitly within and consistent with the LNRS that the LPA is member of, then this could be valued the same as being delivered within the local authority area.

Question 2 (Question 6 in CS)	Do you think that providing guidance on considerations for what habitats can be typically achieved on-site would be helpful?	Yes (if you have ideas on how this would work, provide us with details)	Guidance and accepted standards would be very useful. These could be revised in the same way the metric is revised, as new evidence becomes available. Guidance on typical habitat management prescriptions and notable confounding factors that can influence the successful delivery of different habitat types (e.g. recreational pressure, soil chemistry) would be extremely useful. Example situations could be provided where the delivery of a certain type of habitat is likely to be successful (e.g. no public access, no previous agricultural improvement), and examples where habitat delivery is unlikely to be successful.

Question 3 (Question 7 in CS)	Do you have any suggestions for additional case studies that we should produce?	Yes (provide details of your reasons for this answer)	It would be useful to have additional case studies on piped/culverted watercourses under existing sites which are then restored to open watercourses (linear river units), particularly with regards to the application of the riparian zone when culverted. How to account for the deterioration of retained habitats (i.e. through increased recreational pressure, nutrient deposition).

Question 4 (Question 8 in CS)	Do you agree with the described measures and proposals to help with applying the metric to minerals developments?	Yes (provide details of your reasons for this answer)	Additional guidance and detail on how to assess longer-term, phased proposals would be welcomed - not just for mineral proposals but also multi-phase residential schemes, Local Development Orders, etc. Templates and guidance could be provided for monitoring relevant planning conditions/obligations for these longer, more complex projects. Additional support and guidance on each stage of assessment (i.e. how the LPA should review/approved a Biodiversity Gain Plan) or governance should be provided, to ensure a consistent approach.

Question 5 (Question 9 in CS)	Are there any improvements you would make to the following components of biodiversity metric 3.1 in the short-term, regardingin terms of user-friendliness, simplicity or function?a) the metric calculation and tool (the spreadsheet, valuesvalues, and calculations) b) user guide (including the rules and principles for using the metric) c) habitat condition sheets (included in the technical supplement) d) GIS data import tool (currently not part of the small sites metric) e) case studies f) small sites metric	Yes (f)	We acknowledge that small development sites can make tangible contributions to local wildlife and biodiversity net gain. However, we remain concerned over the appropriateness and benefit gleaned by utilising the Small Sites Metric, in addition to the full Biodiversity Metric. Consistency of approach and assessment is important for upskilling the sector and the use of multiple similar metrics would likely deleterious to this aim. The Small Sites Metric is, in practice, no less complicated than the full Biodiversity Metric. If training and accreditation is to be provided (see question 8) then this 'simplified' metric would not be needed for untrained/unaccredited users or create additional training and accreditation burdens.
Question 6 (Question 10 in CS)	Do you think there are other biodiversity metrics that should be considered alongside biodiversity metric 3.1 for measuring mandatory biodiversity net gain?	No	Consistency across the sector is vitally important. Having to adapt and train on multiple metrics will add to the burdens of the already stretched sector.

Part 3		Response (delete as appropriate)	Provide details of your reasons for this answer
Question 7a (Question 11a in CS)	Do you have any practical suggestions on how we could use species or other ecological data to improve:a) the measuring of losses and gains in the metric?	No	Species impacts need to be assessed on a case-specific basis as a distinct planning consideration (separate from BNG and the metric). There could potentially be some overlap between species conservation strategies feeding into LNRS, which could link with strategic significance (see answer provided for question 1). It may be appropriate to consider assigning a nominal habitat unit value (0.01 units) to faunal enhancements (e.g. bat boxes, bird boxes, etc.) to encourage their provision in developments and allow for minor net losses to be addressed pragmatically onsite.

Question 7b (Question 11b in CS)	Do you have any practical suggestions on how we could use species or other ecological data to improve: b) designing habitat enhancements?	Yes (provide details of your reasons for this answer)	If identified as part of a LNRS, habitats of a known value to an identified locally important species, when delivered in a suitable location, could have added strategic significance weight when accounted for in the metric.

Question 8 (Question 12 in CS)	Do you think that metric users should be required to attend a verified training course or be accredited before completing the calculation? Explain why and what these should cover	Yes, both (training course and accreditation)	There is significant scope for the metric to be misused to achieve a desired outcome. Close scrutiny of metric assessments and associated documents (habitat surveys, landscape management plans) is likely to be a notable burden on LPAs when approving Biodiversity Gain Plans. Taking steps to give confidence in metric assessments is supported, but the LPA will still need to check documents. This approach may reduce the incidence of Biodiversity Gain Plans being rejected and amendments being sought. I would support an accreditation approach to metrics, where professionals are trained to standard and accountability is improved on the way that the metric assessments are undertaken. There is likely a skill separation between being able to use the metric correctly as a tool, and having botanical and habitat identification skills. I think that metric accreditation should be focused on the use of the metric. There are other training courses and competency frameworks which focus on field skills and botany.