

Written evidence from the Institute of Environmental Management and Assessment on the Department for Environment, Food and Rural Affairs' Technical consultation on the biodiversity metric

About IEMA

IEMA is the professional body for those people working in environmental management and in corporate sustainability roles. IEMA's growing membership of over 18,700 professionals work at the interface between organisations, the environment and society in a range of critical roles (for example from sustainability directors through to climate change leads and in consultancy and advisory roles). We also work with a range of corporate partners. Our professional members are active across all sectors in the UK, for example from construction and manufacturing through to logistics, facilities, and across financial, retail, food, consultancy and the wider service and public sector.

Executive summary

IEMA hosted a workshop for both members and other relevant experts outside of the membership to develop this response. Based on the discussions that took place, a summary of our recommendations are as follows:

- Accredited training should be developed for metric users that is supported by the full range of relevant professional bodies
- There should be a definition of a 'competent person' in the small sites metric in regard to ecological understanding
- More case studies and guidance are needed across a range of examples to create a library of information for metric users to tap into
- There needs to be included in the metric a link with marine net gain and meanwhile guidance should be provided on using the metric at the interface of intertidal and marine areas
- The metric must align with updates happening to tools referenced in, and related to, the metric

Question 1

Do you think that the spatial risk multiplier values need reconsidering to better incentivise high value off-site delivery?

There should be more criteria for scoring - that is, more definitions within each band of scoring. This would require research and would probably be unachievable by November. However, it could be something to consider in the longer term.

It would be useful to have connectivity included.

'Local' can mean different things if you're undertaking an infrastructure project that cuts across several local authorities, such as a train line. This could be accounted for in the metric or guidance given on this.

Biodiversity offsetting sites can be part of Local Nature Recovery Strategy sites identified by local authorities. However, the current multiplier of 'high' in the category of Strategic Significance does not produce a score of sufficient value to encourage enhancement.

It is essential that developers look to provide compensation locally as much as possible and so there should be a hierarchy to be considered: onsite, offsite locally (could be within a local authority area or regional as the next level), offsite elsewhere.

Question 2

Do you think that providing guidance on considerations for what habitats can be typically achieved on-site would be helpful?

Guidance could be useful if it is not provided elsewhere already. There could be an issue if the guidance produced is general and becomes a 'tick box' exercise and validation for developers to do the minimum required by such guidance.

A series of best practice case studies that would in effect create a 'library' of examples for developers to work from would be very useful.

Question 3

Do you have any suggestions for additional case studies that we should produce?

Case studies are welcome.

There should be case studies applicable to ecologists, developers, and planners so that they can all understand and ensure the best outcomes for biodiversity are created. These might include high level, easy to access, short videos alongside more detailed documents.

Case studies:

- Mining sites
- How to use the metric at the interface of intertidal and marine areas – this is especially important as net gain in marine areas is still being developed and there is currently no understanding for metric users on how to tackle this
- Urban habitats

- A case study that accounts for the removal of habitats under different obligations
- Less straightforward and excluded aspects such as irreplaceable habitats, protected sites, veteran or ancient trees

Question 4

Do you agree with the described measures and proposals to help with applying the metric to minerals developments?

Yes, we agree these would be useful – both case studies and further guidance – especially information on dealing with the long timescales that can often be involved.

Question 5

Are there any improvements you would make to the following components of biodiversity metric 3.1 in the short-term, in terms of user-friendliness, simplicity or function?

- **the metric calculation and tool (the spreadsheet, values, and calculations)**

There is a lot about the metric where input is dependent on professional expertise and personal judgement, especially the latter which creates an uncertainty which we hope can be reduced over time.

CSM monitoring for SSSI no longer seems to match the metric. This means that professionals are working to two differing systems to inform their actions. This might not be a fix for November but alignment would be helpful.

It would be useful to have a habitat condition sheet that could be edited to allow professionals to capture their own notes.

The UK Habitat Classification System, referred to in the metric, is undertaking updates and these must be considered in V4 of the metric or the metric updated as soon as the revision is completed.

- **user guide (including the rules and principles for using the metric)**

It would be useful to have more clarity on rules and principles and general guidance including, specifically, to understand additionality.

More clarity is needed on 'competent' persons in the small sites metric.

There should be more about strategic significance – tying into, for example, Nature Recovery Networks (NRNs). However, the NRNs will not be rolled out before November, but it does need to be captured in the metric before the next 3–5-year update.

A small site is mapped to detail but for bigger sites, where data is scaled up, detail is lost. It would be useful if there were a way for this to be captured in the metric.

There must be a link to Marine Net Gain added either in the metric or guidance.

Question 6

Do you think there are other biodiversity metrics that should be considered alongside biodiversity metric 3.1 for measuring mandatory biodiversity net gain?

Aspects of the Woodland Carbon Code and the Environmental Benefits from Nature Tool could be incorporated.

Ecosystem service metrics and tools can be considered part of the mix in inputting to the metric, for example, to help with species management.

Question 7

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?

There is a challenge here that measurement and monitoring of data across different species/strands of ecological data has been absent or inconsistent. Providing a value to species can be subjective. The measurement of habitat should pick up species. An EIA can highlight species that are present.

b) designing habitat enhancements?

Mosaic habitats do not score well because their individual parts do not reflect the score of the whole. There is not anything specific that might be used but it could be that the metric is adjusted or that case studies on dealing with this could be created.

Question 8

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?

Training should be available for ecologists, planners and developers and for 'competent persons' who are small sites metric users. Training should be accredited and supported by the full range of relevant professional bodies.

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