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13th May 2022

Bournemouth, Christchurch & Poole Local Plan – Issues and Options Consultation

Response addendum: Biodiversity Net Gain

Following the submission of Dorset Wildlife Trust's response to this application, we would like to provide an addendum which may be helpful when it comes to considering the recommendations made, particularly regarding Biodiversity Net Gain and the need to be ambitious in the vision for sustainable development within the BCP Council area.

Viability of greater Biodiversity Net Gain

In 2020, Swale Borough Council in Kent commissioned a Viability Assessment as part of the evidence base informing their Local Plan. This looked at the additional cost associated with increasing biodiversity net gain (BNG) requirements to 20% compared with the legally required 10% under the Environment Act 2021. Their assessment found that an uplift from a target of 10% BNG to 20% BNG resulted in an increased cost to developers of only £180 per dwelling¹.

This was based on figures calculated in DEFRA's 2019 *Biodiversity net gain and local nature recovery Strategies Impact Assessment*² (see Table 16, p47 and para. 6.11.2, p62). This report provides a detailed analysis of the costs and benefits to approaches used in mandating BNG and concludes *'that net gain delivery costs are likely to be low as a proportion of key variables such as build costs and land prices.'*

In addition, the DEFRA Impact Assessment also states that *'the majority of costs associated with net gain are incurred to correct for the initial loss of biodiversity through development'*. It also recognises that *'advice to the department from some Natural Capital Committee members [...] in line with evidence from academic literature, that a level of net gain at, or ideally above, 10% is necessary to give reasonable confidence in halting development's role in biodiversity loss.'*

In order to ensure that net gain is actually delivered in practice, a higher level of ambition secured through planning policy would demonstrate that your authority is serious about tackling biodiversity loss.

¹ [180504 Report Template V24 \(swale.gov.uk\)](#) (p 24, accessed 12th April 2022)

² [Net gain impact assessment \(publishing.service.gov.uk\)](#) (accessed 12th April 2022)



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Registered Charity No. 200222
Registered Company No. 688439
VAT Registration No. 785 7124 96
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Good practice in Local Planning Authorities

Chapter 4 of the document *Biodiversity net gain. Good practice principles for development. A practical guide* (CIEEM, 2019)³ provides guidance on how BNG can be incorporated into local plans and strategies.

There are a number of local authorities who have chosen or are working to be more ambitious and some examples are provided below:

- Since 2015, Lichfield District Council have had a requirement for a development to deliver habitats of measurably greater biodiversity value than will be lost through the development and stipulate a 20% increase on the value of the habitats lost. This is detailed in their Biodiversity & Development Supplementary Planning Document (SPD).⁴
- As mentioned above, Swale Borough Council have concluded that a 20% BNG requirement would result in negligible extra cost following a viability study. They have used this study as part of their Local Plan evidence base. This ambition is included in the more recent Regulation 18 (Issues and Options) consultation in late 2021.⁵
- Kent County Council has also recently sought tenders for a local viability assessment looking at 10, 15 and 20% BNG for some Kent authorities, an approach driven by the Kent Nature Partnership to help provide the evidence required for Kent LPAs to jointly aim for 20% BNG in their local plans to mitigate the very high level of development pressure in Kent and address concerns around effects on viability.
- South Cambridgeshire District Council's Doubling Nature Vision (adopted February 2021) reflects their growing awareness of biodiversity loss and increasing concerns to protect the natural environment, habitats and species. The vision seeks a 20% level of Biodiversity Net Gain above pre-development baseline conditions. This aspiration is reflected in the Greater Cambridge Shared Planning Biodiversity SPD (adopted February 2022) and the First Proposals for the new shared Local Plan for Cambridge City and South Cambridgeshire Councils⁶ where a policy of 20% BNG is proposed and was consulted on in December 2021.
- The ambition to deliver 20% BNG for all developments is one of the regional environmental principles agreed by Local Authorities within the Oxford-Cambridge Arc intended to reflect the Arc's world leading environmental ambitions and desire to be an exemplar for environmentally sustainable development.⁷

All these examples show how local authorities can strive for greater commitment to the restoration of biodiversity. Although all are at different stages of securing these aspirations, it is clear that 20% BNG is considered to be a viable option and worthy of consideration given the potential for delivering greater benefits for biodiversity and allowing the environment to be left in a better condition for wildlife and future generations.

I hope this information is useful; please do not hesitate to contact me if you would like to discuss further.

Yours Faithfully,

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³ [Biodiversity net gain. Good practice principles for development. A practical guide \(cieem.net\)](#) (Accessed 13th April 2022)

⁴ [Biodiversity and Development SPD \(lichfielddc.gov.uk\)](#) (Accessed 13th April 2022)

⁵ [Swale Borough Local Plan \(October 2021\). Issues and Preferred Options \(Regulation 18\)](#) (Accessed 13th April 2022)

⁶ [Greater Cambridge Local Plan First Proposals \(greatercambridgeplanning.org\)](#) (Accessed 13th April 2022)

⁷ [Appendix 3 - Arc Environment Principles.pdf \(whitehorsedc.gov.uk\)](#) (Accessed 13th April 2022)