



Recommendation for adoption of 20% minimum biodiversity net gain across Surrey's planning sector: *a Surrey Nature Partnership Position Statement*

Summary:

- The **Surrey Nature Partnership** recommends that Surrey's local planning authorities adopt a policy for **Biodiversity Net Gain** that will require developers using **Biodiversity Metric 2.0** (or as subsequently amended) to demonstrate the post-development achievement of a minimum **20%** increase in biodiversity units, in support of their planning application(s).
- This can be justified using government research on this matter as well as the findings of the **State of Surrey's Nature** document. Surrey's relative dependency on its high value natural environment for economic prosperity and employment, and the health & well-being of its population, also contributes to this justification.

I. Need for a position statement.

Surrey's 11 local planning authorities (LPAs) are all currently at various stages in the process of adopting new Local Plans, most of which are guided by the National Planning Policy Framework (March 2019) and related National Planning Policy Guidance. The NPPF advises at paragraph 174(b): *“To protect and enhance biodiversity... plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing **measurable net gains for biodiversity.**”*

The government consulted on the introduction of mandatory biodiversity net gain into the planning system in late 2018 and confirmation of this was announced in spring 2019. The emerging Environment Bill will set-out the statutory obligations of this decision in detail. The consultation has suggested that legislation will set the minimum gain required in biodiversity units at 10% over base value. However, several leaders in this policy area have already adopted a 20% minimum gain, with robust justification for doing so¹.

As the recognised local specialist consultant in this policy area, the Surrey Nature Partnership is of the opinion that similar justification applies locally in Surrey and will consequently promote a recommendation for adopting 20% minimum biodiversity net gain here. It is important that this position is made clear to Surrey's LPAs at this timely stage in their plan-making, and ahead of any

¹ See; Lichfield District Council [Biodiversity & Development: Supplementary Planning Document 2016](#), (p.17) & Oxfordshire's Biodiversity Advisory Group [proposals for the Oxfordshire Plan 2050](#).



more prescriptive guidance from Defra that could undermine our policy position and its associated recommendation.

LPA's might also consider local policy on the issue of potential development exemptions to the requirement for Biodiversity Net Gain, which is currently proposed as a way of retaining economic viability of smaller plots. LPA's could consider a local variation of the suggested minimum threshold size of 10 housing units if, for example, an authority anticipates the majority of its future housing need will be realised within developments below this threshold.

2. Local justification for recommending minimum 20% Biodiversity Net Gain.

2.1 Evidence from national Cost/Benefit Analysis.

Within the evidence presented by Defra consulting on the introduction of Biodiversity Net Gain into the planning system (December 2018-February 2019), it was made clear that an increase of 10% would be the *absolute* minimum necessary to ensure confidence that a net loss in biodiversity would be avoided, and that any gain would actually be realised as an outcome of a development-related biodiversity 'enhancement' project.

Relevant findings from Defra's **Impact Assessment** document² (21/11/2018) include (our emphases):

- “..In simple terms, [10%] is the lowest level of net gain that [Defra] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.”
- “..Advice from some Natural Capital Committee members suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses.”
- “..The department therefore favours as high a level of net gain as is feasible... The analysis undertaken in this Impact Assessment indicates that the level of requirement makes relatively little difference to the costs of mitigating and compensating for impacts.”

2.2 Surrey's rate of biodiversity loss.

In 2017 the SNP published **The State of Surrey's Nature**³, which followed closely the publication of the national **State of Nature 2016** report⁴ and provided an opportunity for some comparisons. Our report concluded the likely local extinction of an estimated 11.5% (or around 1 in 9 species) native to the county since 1985, with a further 4.4% threatened with local extinction. In contrast the national extinction rate in 2016 was concluded at 2% extinct and 13% threatened.

Even without a coastline the Surrey administrative area is recognised as ecologically capable of supporting a relatively diverse flora and fauna (ie. its biodiversity). It may be predicted therefore that our rate of species loss in response to pressures applying universally will be higher than average. This

² See; [Biodiversity Net Gain Consultation Impact Assessment](#), Defra 2018

³ See; [The State of Surrey's Nature](#), SNP 2017.

⁴ Since this, a new national State of Nature 2019 report has been published, which predictably shows a worsening situation.



is indeed the evidence of the *State of Surrey's Nature*. Furthermore, county extinction events result from a steady attrition and final loss of all local populations of a species and there is ample evidence of this in process on many important sites across Surrey. The impacts of historic habitat loss and fragmentation alongside routine wildlife persecution, compounded by more modern and ongoing impacts associated with intensification of agriculture and eutrophication of soils and water, have clearly had particularly negative consequences for the biodiversity of Surrey. It can therefore be concluded quite reasonably that national goals for recovery of biodiversity will in Surrey demand a somewhat elevated approach from our LPAs toward both policy-setting and regulation of mandatory BNG via development management, in order to ensure an uplift beyond that to apply as standard.

2.3 Natural Capital.

One further argument relates to the fundamental role of Surrey's natural environment in its economic prosperity as well as its positive impact on the health and well-being of its residents. These considerations are now collectively appreciated and valued monetarily as 'natural capital', and the evidence for the importance of this in Surrey is growing⁵. We enjoy and indeed are envied for our beautiful, signature countryside, which encourages domestic and foreign tourism, attracts significant business start-ups and relocations, and features strongly in local product branding and endorsement. In recognition of this role an enhanced focus on investment in our natural environment over and above the norm would appear to be justifiably sound. Biodiversity Net Gain is the only current measurable proxy for the level of such investment.

3. Conclusion.

These factors, both general and pertinent to Surrey, commend us to the position of support and active encouragement for universal adoption of a required minimum 20% biodiversity net gain within relevant policy by all of our local planning authorities. The necessary justification is clearly laid out above and may be used by LPAs to underpin their policies.

There is already some information available on the practical achievement of biodiversity net gains on the SNP website⁶. In time, the SNP intends to issue further guidance to aid both developers and planners in the interpretation and regulation of biodiversity net gain, and remains able to assist Surrey's LPAs in whatever way on this matter in the interim.

⁵ See; [Natural Capital Investment Plan for Surrey](#), SNP 2018.

⁶ See; [Biodiversity & Planning in Surrey](#), March 2019 (p.35-36, section 4a), and [Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network](#), September 2019 (p.5, section 1.3).