

Protecting Scotland's wildlife for the future

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A Biodiversity Metric for Scotland's Planning System – Key Issues

I am writing to you to on behalf of the Scottish Wildlife Trust in response to A Biodiversity Metric for Scotland's Planning System – Key Issues consultation.

Scottish Wildlife Trust are not specifically responding to each of the nine key issues identified but we have some general comments we wish to put forward:

1. The mitigation hierarchy must be rigorously enforced before any thought is given to overall Biodiversity Net-Gain (BNG) or similar approaches and this must be emphasised, even in consultations such as this.
2. We have considerable concerns regarding the level of expertise and resources within local authorities to properly implement BNG or similar approaches. This applies both to planning and biodiversity teams, as well as to local councillors who will be required to make planning related decisions without the necessary biodiversity and nature literacy. Our concerns are supported by evidence gathered by CIEEMⁱ.
3. We need to see an improvement in data collection, management, and availability in order to implement a functioning overall BNG or similar approach.
4. We want to see points 1,2,3 addressed before we move forward to operationalising net-gain approaches in Scotland.
5. We strongly believe that planning permission must not be given for developments on protected areas. Regardless of reported biodiversity net-gain, degraded protected areas must not justify development.
6. We have concerns regarding the ability of the metric used in England to account for local loss of ecological connectivity at the point of loss. We would like to see steps taken to assess this local loss of connectivity and then have this reflected in an overall increased net-gain requirement. Requiring local authorities to use Nature Network mapping to direct net-gain credits to projects closest to the point of loss will help address the loss of connectivity and ensure that a landscape scale approach is taken.

Thank you for your engagement on this important topic. We look forward to hearing about further progress and would be happy to meet to discuss.

Yours faithfully,

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ⁱ CIEEM (2022). [Report on Survey of Scottish Local Planning Authority Ecological Capacity and Expertise. Survey issued by CIEEM in collaboration with the Association of Local Government Ecologists \(ALGE\).](#)