

Title:	GNCF Biodiversity net gain principles and spatial operating strategy
Author:	Lenane, Rachel
Date:	20/12/2022

Summary

Introduction

The secondary legislation for BNG is not yet published, and operating process and different business models for biodiversity net gain are still under development. This paper sets out how the Gloucestershire Nature + Climate Fund will operate as a viable trading business and meet its goals of strategic placement of biodiversity net gain, transparency and equitability.

The principles for biodiversity net gain are generally agreed on and well understood and GNCF will adopt the principles and guidance from 'CIEEM, CIRIA, IEMA (2016). BNG Good practice principles for development' (figure 1).

Biodiversity Net Gain - Good practice principles for development _____

Principle 1. Apply the Mitigation Hierarchy

Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere

Principle 3. Be inclusive and equitable

Principle 4. Address risks

Principle 5. Make a measurable Net Gain contribution

Principle 6. Achieve the best outcomes for biodiversity

Principle 7. Be additional

Principle 8. Create a Net Gain legacy

Principle 9. Optimise sustainability

Principle 10. Be transparent

Figure 1. CIEEM, CIRIA, IEMA (2016). BNG Good practice principles for development

Implicit within the way that BNG legislation is written and can be applied is that habitat which is entered into and protected by a BNG scheme for 30 years is likely to be required to be protected in perpetuity (principle 8: create a net gain legacy)

In developing a strategy for site selection and prioritisation we will need to acknowledge the potential 'perpetuity' of the schemes within GNCF conversations and contracts, or at least the uncertainty of what comes after the 30 year contract has ended; and secondly ensure that we have a mixed portfolio of sites that helps to mitigate any potential social and economic inequity arising from this legislation (section 1.1).

In addition to the *CIEEM, CIRIA, IEMA (2016). BNG Good practice principles for development* it is proposed that GNCF:

1. Reviews the 10% minimum requirement for BNG in 2024 and opens discussions with Local Planning Authorities about whether 10% is sufficient.
2. Ensures that GNCF operates an independent risk-based monitoring and compliance programme for the BNG schemes it has brokered.
3. Puts due diligence procedures in place to ensure quality information is provided from developers and that metrics (both onsite and offsite) have been completed by competent and qualified individuals.
4. Adopts a 'biodiversity comes first' approach when applying BNG policy. Biodiversity gain should take precedence and not lose out to public space, developer concerns, proximity to development, etc.
5. Is precautionary in BNG predictions to ensure the uplift potential is not over-estimated.
6. Avoids good quality agricultural land being used for BG (except where clear rationale e.g. connecting corridor).
7. Agrees an approach to Open Mosaic Habitat (OMH). OMH on previously developed land is classed as 'Highly Distinctive' in the Defra 3.1 metric. While there is no doubt that this is an important habitat, it is arguably the type of habitat most often created, as urban sites are left derelict. Trading rules in the metric suggest that the loss of OMH should be compensated for by the gain of the same habitat. However, securing a site appropriate for OMH creation is problematic from a price perspective as nearly all will be appropriate for development. Additionally, creating OMH on land that has never had a hard surface is likely to involve the introduction of aggregate or substrate and removal of topsoil etc. Introducing man-made elements into a "green" habitat is inappropriate. A policy could be adopted to compensate for losses of OMH with the creation of other habitat classified as highly distinctive by the metric e.g. lowland meadow, lowland mixed deciduous woodland or lowland heathland.

Section 1. The GNCF site prioritisation process and spatial strategy

To be a functioning and solvent business the Gloucestershire Nature + Climate Fund must have a pipeline of land from which to sell BNG units. In the first couple of years of trading GNCF will need to prove itself as a business by reputation and word of mouth between peers and neighbours. To do that we need a pipeline of BNG units to trade and to outcompete competitors in the market. Given the restrictions on landowners that are able to sign up to a BNG scheme (see separate paper on BNG Landowner profiles) it is likely that GNCF will not have the luxury of selecting our BNG units entirely from the Nature Recovery Network, at least in the first couple of years. We must also note that the NRN, while based on the best available evidence, is not ground-truthed and needs to be considered alongside evidence on habitat/site suitability from a site visit.

We may be able to build selected sites into the new LNRS and because neighbours talk to one another and provide a word-of-mouth route into environmental stewardship schemes, use schemes to create connectivity and join up with the NRN in the medium to long term.

1.1 GNCF Spatial strategy

The GNCF strategic spatial prioritisation process is built on the premise of Lawton's principles of improving the condition of priority habitats for nature, expanding suitable sites for biodiversity and connecting up existing biodiverse sites (Figure 2.)

In addition to the Lawton principles, GNCF needs to ensure transparency in the site selection process and equal opportunities for access to the BNG market, within the limitations of the legislation. GNCF will work to ensure that:

- BNG receptor sites are in proximity to development sites (in proximity within the planning authority district);
- BNG receptor sites fall within the Local Nature Recovery Strategy, and until the LNRS is in place, within or in proximity to the Gloucestershire Nature Recovery Network (created by Gloucestershire Wildlife Trust);
- Each Planning Authority in Gloucestershire has a mixed portfolio of BNG receptor sites to support equal opportunity to access. This includes:
 - Green infrastructure (GI) around the more urban areas of the PA, preferably with public access;
 - Rural habitat creation and restoration;
 - A mix of privately owned and publicly owned land in each PA.

Guided by:

- Lawton's principles, from 'Rebuilding Nature'

(enhancing the resilience and coherence of England's ecological network: more, bigger, better and joined; reducing pressures)

- Local Nature Recovery Strategy (and Nature Recovery Network and NC mapping)

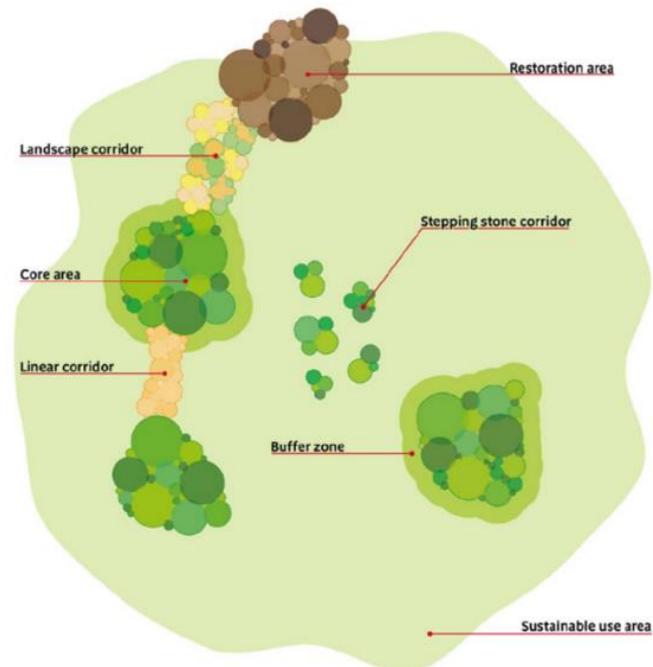


Figure 2. The GNCNF strategic spatial priority is based on Lawton's principles

1.1 GNCNF prioritisation process

- Call for sites from privately owned land from beginning of October to end of February each year, because this fits with the need to survey sites in Spring/Summer. GNCNF will be open to enquiries throughout the year, but a marketing push will happen Oct - Feb.
- Work throughout the year with Gloucestershire Local Planning Authorities to identify any suitable land holdings of theirs for BNG schemes which sit within or adjacent to the Nature Recovery Network
- GNCNF should have a target number of hectares for BNG sign up each year, corresponding to the business case – and adjust these dynamically according to how the market responds each year; a minimum 3 different landowners per PA; and different BNG receptor site characteristics per PA.

1.2 Steps for identifying privately owned land for BNG schemes

Step 1. Expression of interest in a BNG scheme – landowners submit an email with the following BNG baseline criteria check:

- Landowner permission for participation, and willingness for land use to be changed in perpetuity (30+years)
- Economy of scale – we are initially looking for sites of ~7+ hectares per landowner (if in an urban area smaller land parcels may be considered)
- Potential for significant improvements in existing habitat
- Commitment of proposing organisation and other partners to contribute time to the development of the project
- Previous experience in successful habitat creation, or willingness to engage experts to do so

Step 2.a. GNCF BNG land prioritisation criteria check:

GNCF will check to see whether the proposed site falls within the existing Nature Recovery Network (or the future Local Nature Recovery Strategy) and/or is in proximity to a priority habitat.

Step 2.b. Additional GNCF BNG land prioritisation criteria check per Planning Authority (see annexe I).

These have been suggested by Gareth Parry, former Strategic Nature Director, GWT). These checks are going to the LNP Nature Recovery Group for any amendments and sign off on 13th December.

Step 3. Site assessment (by GNCF Manager) (see separate pdf pro forma 'Stage 1_BNG scheme proposal' for site assessment form)

Step 4. Confirm site selection by GNCF Board and sign off by LPA representative

GNCF recommends sites to the GNCF Board and confirms they meet the spatial strategy. BNG receptor sites must then be signed off as suitable by a representative from the Planning Authority, (BNG units are bought/sold to resolve planning conditions and therefore the Local Planning Authority must agree that each site meets their BNG requirements).

Step 5. After sign off by GNCF Board and LPA – take site forward to investment readiness

At this point where the Planning Authority has agreed that they are happy with the placement of the BNG receptor site, the landowner can commission the BNG surveys for their land and begin to get land 'BNG investment ready' (following the GNCF BNG process).

Annexe I

Additional GNCf BNG land prioritisation criteria check per planning authority. These have been suggested by Gareth Parry, former Strategic Nature Director, GWT). These checks (text below) are going to the LNP Nature Recovery Group for any amendments and sign off.

Strategic gaps in the Gloucestershire Nature Recovery Network

Based on current data this is where enhancement is likely to deliver the biggest ecological benefits for the county.

- Woodland network from the Wye Valley/Forest of Dean of Dean to the Malvern Hills
- East west woodland and grassland network across the central Severn vale, Stroud Valleys up to the escarpment
- Major wetland stepping stones along the River Severn and Vale into Worcestershire.
- An arc of grassland and wetland network from Barnsley Warren SSSI heading south the Water Park and Cricklade and east into Oxfordshire
- Wetland and grassland network along the Windrush Valley.

District level priority opportunities (Blue = NRN strategic priority)

Stroud

- [Wetland network along the River Severn and Vale \(north-south\)](#)
- [Woodland and grassland network east-west from the Severn, along the Stroud Valleys to the escarpment.](#)
- New GI provision close to urban areas to reduce recreational pressure on the Cotswold Commons and Beechwoods and Severn Estuary.

Cheltenham

- New GI just to reduce recreational pressure on Cotswold Beechwoods SAC, Crickley Hill, Leckhampton Hill, Cleeve Common and Coombe Hill SSSIs e.g. Crickley Hill and Leckhampton Hill extension or within west of Cheltenham development (Tracey accepts there is not much room left in the town)
- Woodland/grassland network between Leckhampton Hill and Cleeve Common
- GI 'fingers' linking the town with surrounding landscapes

Gloucester

- New multifunctional wetland/ recreational space at Severnside Nature Park.
- [Wetland network along the River Severn and Vale \(north-south\)](#)

Cotswolds

- New GI just to reduce recreational pressure on Cotswold Beechwoods SAC, Crickley Hill SSSI – Crickley Extension.

- Arc of grassland and wetland network from Barnsley Warren SSSI heading south to the Water Park and Cricklade and east into Oxfordshire
- Wetland and grassland network along the Windrush Valley (Bourton to Buford via Sherborne)
- Cross border woodland network connectivity with South Gloucestershire, going through Lower Woods to Westonbirt
- Alternative GI provision for recreation close to Water Park

Tewkesbury

- Wetland network along the River Severn and Vale (north-south).
- Enhanced GI around Tewkesbury Garden Town to reduce recreation pressure on land functionally linked to the Severn Estuary SPA.

Forest of Dean

- Woodland network from the Wye Valley/Forest of Dean of Dean to the Malvern Hills
- Wetland network along the River Severn and Vale (north-south). Key opportunities around Chaxhill, Westbury and Lydney and improving condition of Leadon catchment.
- Network of woodland/heathland mosaics across the District (most of Gloucestershire's heathlands are in the District and much is in poor condition)
- Expanding, enhancing and connecting species rich grassland around Blakeney
- Traditional orchards moving north from Cinderford and Chaxhill