



Biodiversity Offsetting

An overview of The Wildlife Trust position

The Wildlife Trusts cautiously welcome biodiversity offsetting, but believe that any future system must have a clear purpose and must avoid undermining the very protections for the wildlife rich places that society, our economy and environment need and value.

We do not believe that the current planning system is broken, but some things could work better, including the way in which the value of nature is factored into decision making.

Biodiversity offsetting should be done for the right reasons, in the right way and NOT for the wrong reasons, in the wrong way. We fear the current proposals are not entirely on the right side of this equation.

Right reasons

- *Purpose and vision:* There must be a clear purpose for biodiversity offsetting set within a framework for delivering ecological networks to achieve the ambitions of Lawton¹ and the Natural Environment White Paper² - if done in the right way biodiversity offsetting is just one mechanism for supporting the delivery of this vision.
- *Value Nature:* Biodiversity offsetting must effectively account for the true value of nature and address the issue that wildlife, and wildlife rich places, are currently not adequately valued within the planning system.

Right way

- *Consistency:* There is a need for the system to be mandatory, and for national standards and guidance, in order to create clarity around expectations of all the relevant players, a level playing field and consistency across the country.
- *Metric:* The current metric should be developed to address the complexities and risks associated with restoring and creating habitat. It will also need to ensure species, habitat connectivity and potential value are all factored in. For example it should require a larger offset if a place contains a major species stronghold or is a critical part of the wider ecological network. The baseline should also be set higher than the current degraded state of much of our countryside and urban greenspaces. The Somerset Wildlife Trust, working with Somerset County Council and the Somerset Environmental Records Centre, has developed a strategy and alternative metric, which builds on the Defra work and factors in the species and connectivity elements (attached).
- *Proximity:* Location of offsets should follow the proximity principle and be used in as locally strategic way as possible, to secure a meaningful ecological relationship between the development site, the compensatory scheme and the local community which will be

¹ Lawton, J.H. et al (2010): Making Space for Nature: a review of England's wildlife sites and ecological network.

² HM Government (2011): The Natural Choice: securing the value of nature

impacted. It is unacceptable from both an ecological and societal point of view to offset development in one part of the country by creating habitat in another, for example destroying habitat in Kent and creating new habitat in Cumbria.

- *Net gain*: There should be an ambition to achieve a ‘net gain’ for biodiversity, not just ‘no net loss’ – there are many strategic opportunities at a local (county) scale which are being identified by partnerships such as Local Nature Partnership in the form of ecological network maps and strategies. These strategies should inform where offsets are located to generate greatest possible ecological gain – avoiding and mitigating loss remains essential.
- *Long term commitment*: It is critical that offset delivery is secured in perpetuity. This will require effective and adequate investment, monitoring and enforcement. It would not be acceptable to ‘undo’ an offset, by allowing it to be destroyed by a future development, in order to simply create another offset elsewhere
- *Ecological competence, confidence and capacity*: Currently, only 35% of local planning authorities have access to ecological expertise. 81% of planners have said that their preference would be to have in-house ecologist. Currently skills are lacking for enforcement, land management and applying the mitigation hierarchy. This lack of competence and confidence presents a serious risk to operating a successful offsetting scheme

Wrong reasons

- *Cheaper and quicker process*: A primary objective of biodiversity offsetting should be to fully compensate for the residual impact of a development on the natural environment not be to increase speed of planning or reduce the cost of development. This could be a consequence, but it should not be the driver.

Wrong way

- *Irreplaceable habitats*: Some habitats have taken centuries to develop and cannot be replaced in human time-scales and their development should not be facilitated by the offsetting system
- *Circumvent the mitigation hierarchy* – Biodiversity Offsetting should only be used as a last resort to compensate for residual impact of a development. It is essential to retain a critical focus on avoiding loss or damage to important habitats and designing meaningful wildlife rich places into development.

Conclusion

Biodiversity offsetting has potential, but, unlike carbon offsetting, the natural world is complex and the approach has a number of dangerous pitfalls. It should only be used as a last resort. TWT has engaged in this debate for a number of years and more recently in the six pilots. We will continue to engage and hope that Government demonstrates that it is listening to the legitimate concerns, in order to create a mechanism that can play a part in a more wildlife rich future and not undermine this ambition.

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