Scottish Planning Biodiversity Metric consultation

About this form

This Word form is intended for offline use and may not be fully accessible.

Contact the NatureScot SPBM team if you need help completing this form.

Email: ScotBioMetric@nature.scot

Who should use this form

The Commonplace website is the online portal chosen to host NatureScot's consultation on the SPBM and is our preferred route for receiving responses. We strongly encourage all responses to be made through this platform. The platform facilitates easier analysis of responses and prevents any feedback being missed. You can alternatively use this Word form to respond to the NatureScot consultation if you are struggling to use the Commonplace website. In which case, please email the completed form to **ScotBioMetric@nature.scot**.

The primary purpose of this Word form, however, is to help people prepare for providing responses via the Commonplace website. It lets you review the full list of the consultation questions in one place and allows you to draft and refine your responses before transferring / copying and pasting these into the appropriate sections of the Commonplace website. Sharing the form with colleagues also provides a means of collaborating on such drafting before submitting a response from your organisation.

Before you start

All sections of the consultation are optional, including the 'Information about you' section. We encourage you to complete as many sections that are relevant to you as possible.

When engaging with the consultation, please include comments on what you like as well as what you think could be changed or improved. Highlighting what you like may help these aspects to remain.

Section A: Information about you

Any personal data we collect will be handled in line with NatureScot's privacy notice which is available for download on the NatureScot SPBM consultation webpage. Sharing any identifying information is entirely optional. Please complete as many of the questions below as you feel comfortable completing. The more information you share, the better informed our analysis of responses will be when used to improve the SPBM.

Table 1: Information about you

Would you like your response to be confidential? (select one option)	☐ Yes – none of your response is directly shared outside of the SPBM team but may be paraphrased in reporting. ☐ No – your responses can be publicly shared but will not be attributed and identifying information will be removed. ☑ No – your responses can be publicly shared and attributed to non-specific identity information such as your industry or job role. ☐ No – your responses can be publicly shared and attributed to you personally.
Are you responding as part of an organisation?	☑ Yes ☐ No
If so, what is the name of the organisation?	East Dunbartonshire Council
What role or background best describes your interest in the consultation version SPBM? (select one option)	☐ Ecological, planning or environmental consultant ☐ Developer ☑ Planning or consenting authority ☐ Public body ☐ Environmental group or NGO ☐ Academic (including student) ☐ Land agent, landowner, or land manager ☐ Member of the public with an interest ☐ Other individual, body, or organisation with an interest
Do you have experience of using any other biodiversity metric?	☐ Yes ☑ No
If so, which metrics and how would you describe your level of experience?	N/A
If you would be happy to potentially be contacted by the NatureScot team about your response, please include your name and email address.	Development.plan@eastdunbartonshire.gov.uk

Section B: Consenting authorities

This survey section provides an opportunity to provide feedback on whether the guidance available for consenting authorities is suitable.

To fully explore relevant background, all SPBM consultation documents (the calculation tool, user guide and habitat condition assessment sheets) are available on the NatureScot SPBM consultation webpage.

Consenting authorities

'Appendix C – Supporting guidance for consenting authorities' of the user guide provides a summary of the key considerations for consenting authority staff. It seeks to highlight key sections within the user guide that are of particular importance for consenting authorities who may be reviewing metric outputs supporting an application.

We are interested to know if the user guide, and particularly Appendix C, provide clear enough advice and explanation on how to engage with the SPBM and whether the tool functionality also supports consenting authorities, e.g. in terms of clarity of reporting in the headline results page. Note that we use 'consenting authority' as shorthand to encompass both Scottish Ministers and planning authorities.

Table 2: Consenting authorities

To what extent do you agree that there is appropriate SPBM user guide advice for consenting authorities, noting for example Appendix C of the user guide, and whether the tool functionality also supports consenting authorities?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that there is appropriate advice for consenting authorities, what specific changes or additional guidance or advice would you want and why?	N/A

Table 3: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	The metric is welcomed by the EDC Development Management service who support a standard approach to measuring biodiversity impact, while still allowing for case-by-case consideration. The metric will provide a more structured basis for challenging insufficient or poorly evidenced enhancement proposals which historically has been difficult and subject to extensive negotiation with developers.

Section C: Habitats

This survey will address the SPBM habitat classifications, distinctiveness, condition assessments and habitats where the 'create' function has been disabled in the tool. Please note there are also more specific questions on the SPBM approach to individual trees and peatlands in other surveys.

To fully explore relevant background, all SPBM consultation documents (the calculation tool, user guide, and habitat condition assessment sheets) are available on the NatureScot SPBM consultation webpage.

Habitat classification

In the SPBM, the English statutory biodiversity metric habitat classifications approach has been amended to better capture the range of habitats present in Scotland. This process has involved

reviewing consultation feedback, commissioning expert independent research, receiving advice from internal specialist habitat advisors, external specialist advisors, and discussion with UKHab Ltd.

The SPBM has adapted the English statutory biodiversity metric habitat classification approach in a way that retains reliance on the UK Habitat Classification (UKHab) as an underlying basis for SPBM categories.

The SPBM aligns with UKHab for defining broad habitat categories which are equivalent to UKHab Level 2 (grassland, woodland, wetland etc.). The SPBM habitat types align with UKHab Level 4, 5 and 6 and in some instances are defined through a combination of UKHab primary and secondary codes. A small number of unique SPBM specific habitat types have been included, and these are described fully in the user guide's 'Appendix E – SPBM habitats and user considerations'.

There around 60% more terrestrial habitat types in the SPBM than in the English statutory biodiversity metric. This provides more nuanced accounting for valued habitats present in Scotland such as rainforest and machair, as well as helping differentiate habitats which receive a lower distinctiveness scoring such as 'Species-poor purple moor grass grassland'.

All SPBM habitat types are listed in the 'T-1 Habitat Data' technical sheet of the SPBM calculation Tool and again in the habitat condition assessment sheets.

Table 4: Habitat classification

To what extent do you agree that the SPBM's broad approach to habitat categorisation (with its underlying reliance on UKHab classification) is appropriate and fit for purpose?	☐ Strongly agree ☐ Agree ☑ Unsure ☐ Disagree ☐ Strongly disagree
If you do not support the SPBM approach to habitat categorisation, what changes would you suggest, and why?	See comment below.
To what extent do you agree that the SPBM categorisation of habitat types is appropriate and fit for purpose?	☐ Strongly agree ☐ Agree ☐ Unsure ☑ Disagree ☐ Strongly disagree
If you do not support the SPBM categorisation of habitat types, what changes would you suggest, are there any Scottish habitats missing from the list and/or any habitats potentially under-/over-represented, and why?	See comment below.
Do you have any additional comments on the SPBM habitat classification approach that have not been covered in previous questions?	The central focus on habitats means they are used as a proxy for biodiversity. This may be useful in rural areas but may not capture the wider biodiversity opportunities in brownfield land, urban and peri-urban areas through urban landscaping in development. Furthermore, the metric does not consider the role of landscape

	engineers, the humans involved in the long-term care and management of the site and who can nurture positive outcomes for biodiversity through their horticultural, ecological and landscape expertise. This is difficult to capture quantitatively which relates to the overall challenge of the metric – in that biodiversity is not a single unit or fixed value and that it is incredibly difficult to capture the complexity of biodiversity post development. Interventions are likely to deliver single post development outcomes but without long-term care and management, these are likely to fail and potentially leave a site with a net loss of biodiversity.

Habitats where the create function is disabled

The 'create' intervention function has been disabled within the SPBM for certain habitats where NatureScot is not aware of any valid methodology for establishing these, except perhaps across a very significant timescale. The 'create' function has also been disabled for certain habitats comprised of Invasive Non-Native Species (INNS) to help ensure these are not intentionally created. By removing the option to create such habitats users are steered towards sensible use of the tool and good ecological practice.

Habitats where the create function is disabled are described in the 'Habitat interventions' section of the user guide.

Table 5: Habitats where the create function is disabled

To what extent do you agree that the SPBM's approach to disabling the create function for certain habitats is appropriate and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not support the SPBM approach to disabling the create function for certain habitats, what changes would you suggest, and why?	N/A
To what extent do you agree that the habitat types where the create function is disabled have been appropriately selected?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not support the selection of habitat types where the creation function is disabled, what changes would you suggest, and why?	N/A
Do you have any additional comments on the SPBM approach to disabling the create	No

function that have not been covered in previous questions?	

Condition assessment

A habitat's condition is a measure of the habitat against its ecologically optimum state. It is a way of measuring variation in the quality of patches of the same habitat group and is often linked to land use and past or present management.

A habitat condition assessment (HCA) should be completed for each habitat parcel within the biodiversity assessment boundary. Targeted HCA sheets for each habitat type or broad habitat can be used to assign the habitat condition category: Good, Fairly Good, Moderate, Fairly Poor, Poor, Condition assessment N/A, or N/A other.

The SPBM habitat condition assessments typically follow the format of the statutory biodiversity metric HCAs. We have reviewed and revisited all the criteria in condition assessment sheets, so that these better accommodate the Scottish context (e.g. relating to indicator species and policy and legislation). We have created new condition assessment sheets where necessary, such as for new SPBM habitat types. We have considered published research findings about what may not have been working so well in the English metric condition sheets.

Habitat condition assessment worksheets are presented in an Excel spreadsheet and described in the 'habitat condition' section of the user guide.

Table 6: Condition assessment

To what extent do you agree that the habitat condition assessment sheets and individual condition assessment criteria are appropriate and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not support the habitat condition assessment sheets and/or individual condition assessment criteria, what specific changes would you make and why?	N/A
Do you find the habitat condition assessment and the individual condition assessment criteria easy to understand and navigate?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not find the habitat condition assessment easy to understand or navigate, what specific changes would you make and why?	N/A
Do you have any additional comments on habitat condition assessment that have not been covered in previous questions?	No

Distinctiveness

Habitat distinctiveness scores for the SPBM were revisited for the Scottish context taking account of professional judgement including advice from specialist stakeholders and NatureScot habitat advisers. This considered the habitat type and its distinguishing features including its species richness, rarity (at local, regional, national and international scales), the extent to which it was protected by designations and the degree to which it supported species rarely found in other habitats.

There are six distinctiveness categories and associated scores in the SPBM: Negligible (0), Very Low (1), Low (2), Medium (4), High (6), Very High (8). This is described in the 'habitat distinctiveness' section of the user guide, together with a general description for each category. Distinctiveness scores are auto-populated in the SPBM calculation tool depending on the habitat type and cannot be amended by the user.

The distinctiveness scores for all SPBM habitat classifications are listed in the 'T-1 Habitat Data' technical sheet of the SPBM calculation tool.

Table 7: Distinctiveness

To what extent do you agree that the basis for assigning the distinctiveness scoring of habitats in the SPBM is appropriate and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that this basis for assigning distinctiveness is are appropriate and fit for purpose, what specific changes would you make, or new factors would you include, and why?	N/A
To what extent do you agree that the use of the distinctiveness categories from Very High to Negligible and scorings from 8 to 0 respectively are appropriate for categorising Scottish habitats for the purposes of the SPBM?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that these categories are appropriate, what specific changes would you make and why?	N/A
To what extent do you agree that the habitats in the SPBM are all assigned to the most appropriate distinctiveness categories from Very High to Negligible?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the habitats are assigned to the correct distinctiveness category, which habitats would you reassign, to which	N/A

distinctiveness category would you assign them, and why?	
Do you have any additional comments on the distinctiveness categories that have not been covered in the previous questions?	No

Table 8: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	None

Section D: Individual trees

This survey will address individual tree considerations, including the calculation of baseline tree canopy area, distinctiveness, and post-development calculations.

To fully explore relevant background, all SPBM consultation documents (the calculation tool, user guide, and habitat condition assessment sheets) are available on the NatureScot SPBM consultation webpage.

The SPBM approach to individual trees is covered in 'Appendix H – Individual trees' of the user guide. Calculations for individual trees should be recorded in the dedicated tree calculation sheet of the SPBM calculation tool (Tree Calculator).

Tree type and distinctiveness

The SPBM categorises trees into three Tree Types based on their distinctiveness levels (low, medium, and high) based on:

- whether the species is classified as native or non-native
- whether the species has traits that can indicate an invasive nature or hybridise with native species
- recognised benefits for biodiversity.

The user guide lists tree species that should fall into each category and allows that some normally medium distinctiveness non-native species can be considered high distinctiveness in an urban setting. This approach allows for more refined assessment.

The approach to categorising trees into Tree Type distinctiveness levels is described in the 'Tree type and distinctiveness' section of 'Appendix H – Individual trees' of the user guide.

Table 9: Tree type and distinctiveness

To what extent do you agree with the SPBM approach of categorising trees into distinctiveness levels (low, medium, and high)?	☐ Strongly agree ☐ Agree ☐ Unsure ☐ Disagree ☑ Strongly disagree

If you do not agree with the approach to categorising trees based on distinctiveness level, what specific changes would you make and why?	See comment below
To what extent do you agree with the criteria for categorising trees into different distinctiveness levels?	☐ Strongly agree ☐ Agree ☐ Unsure ☐ Disagree ☑ Strongly disagree
If you do not agree with the criteria for categorising trees into different distinctiveness levels, what specific changes would you make and why?	See comment below
Do you have any additional comments on the approach to tree type and distinctiveness that have not been covered in the other questions?	The approach to categorise species and cultivars into high, medium and low distinctiveness does not account for the biodiversity value achieved through ecologically diverse planting schemes or landscape design plans. It also doesn't account for the biodiversity value of dead wood and trees that may provide habitat for invertebrates in their bark. It would be overly simplistic to assess the value of a tree species under a single criterion, particularly for development in and around urban/peri urban areas, where tree selection must consider visual context, (historic and designed) landscape, urban canopy and climate resilience, in terms of urban heat island effect, interception of high rainfall and mitigation of storm event flooding. It is to be noted that several tree species listed in the low distinctiveness category are not invasive, including Acer palmatum, Ginkgo biloba, Pinus nigra etc in urban contexts. It may not be suitable to plant certain non-native taxa in existing or newly created wild habitats but consideration must be given to the opportunity to plant more diverse, climate resilient and responsive planting in urban and peri-urban development. It should also be noted that native does not always equal good for biodiversity, as exampled by our native sea buckthorn, which has impacted sand dune habitats beyond its native habitat in the south of Scotland. Local authorities,

	developers and other stakeholders need to be supported in selecting the right plant for the right place. Biodiversity, particularly in urban contexts, is designed and cared for long-term rather than delivered through native planting.

Calculating area

To calculate the baseline individual tree area, the tree canopy should be measured from the tree trunk to the canopy edge at the four cardinal compass points; north, south, east and west. These distances should be input into the SPBM tree calculator, where they are then used to calculate the average canopy cover for the tree.

As part of any planned Tree Restoration intervention, the baseline area of the individual tree will remain unchanged in the post-development tool calculations. It cannot be changed by the user.

For a Tree Creation intervention (i.e. tree planting), the SPBM prepopulates a fixed value for the predicted future tree size, using the average tree area of a medium-sized tree from the statutory biodiversity metric. This retains a degree of simplicity, whilst helping account for future growth of the tree. When entering a Tree Creation into the tool, users can potentially add in a quantity of individual trees in the same row (this removing the requirement for each individual planted tree to be input into a separate SPBM row).

The approach to calculating individual tree area is described in the 'Calculating tree area' section, and in the 'Recording individual trees at post-development' section, of 'Appendix H – Individual trees' of the user guide.

Table 10: Calculating canopy area

To what extent do you agree with calculating baseline tree canopy area as an average ellipse based on field measurements as opposed to categorising baseline trees more approximately into broader size class bands (as the English metric does)?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree with the approach to calculating canopy area as an average ellipse, what specific changes would you make and why?	N/A
To what extent do you agree with the approach for calculating post-development tree biodiversity units (BUs) for individual trees ?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree with the approach to calculating post-development BUs for individual trees, what specific changes would you make and why?	N/A
Do you have any additional comments on the approach to calculating baseline canopy area	No

and post-development calculations that have not been covered in any the other questions?	

Table 11: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	None

Section E: Other components

This survey will address the approach to various multiplier components in the SPBM, as well as the SPBM approach to habitat intervention types.

The SPBM includes several multiplier components which contribute to the baseline and post-development calculation of biodiversity units for a particular habitat parcel. For example, through the strategic significance multiplier, the scoring can be higher where a parcel contributes well to ecological connectivity and is of local ecological importance. A decrease in units can arise through the difficulty risk and temporal risk multipliers, if certain habitat interventions are more challenging and will take longer to reach their target condition. The spatial risk multiplier can also result in less units where delivery measures occur outside the development site. We have revisited the approach to these multipliers in the SPBM.

We have included a 'Habitat Transition' intervention in the SPBM, alongside the habitat creation and habitat restoration intervention types. It is hoped that this can help encourage certain more ambitious delivery projects where these may otherwise have been discounted because of low biodiversity unit returns.

To fully explore relevant background, all SPBM consultation documents (the calculation tool, user guide, and habitat condition assessment sheets) are available on the NatureScot SPBM consultation webpage.

Spatial risk

The spatial risk multiplier in the SPBM reflects the relationship between the location of on-site biodiversity loss and the location of off-site delivery measures. It helps reinforce the 'proximity principle' contained in the Scottish Government Planning Guidance: Biodiversity in terms of on-site preference by scoring on-site delivery more positively than off-site delivery. In the SPBM there are just two spatial risk categories and scores: on-site (the multiplier is 1.0); off-site (the multiplier is 0.9). Where off-site delivery is being proposed within the SPBM, a 'flag' will appear in the headline results page alongside a prompt for the user to provide rationale to support this choice and describe how off-site delivery will be secured through planning.

The spatial risk multiplier is described in the 'Spatial risk' section of the SPBM user guide (within the 'Risk multipliers' section).

Table 12: Spatial risk

To what extent do you agree that the approach to the spatial risk multiplier in the SPBM helps support the policy preference for on-site delivery measures?	☐ Strongly agree ☑ Agree ☐ Unsure

	☐ Disagree ☐ Strongly disagree
If you do not agree that this approach supports the policy preference for on-site delivery, what specific changes would you make and why?	N/A
To what extent do you agree that a negative multiplier of 0.9 for off-site delivery provides an appropriate incentive for on-site delivery?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that this provides an appropriate incentive, what multiplier value would you propose and why?	N/A
Do you have any additional comments on the spatial risk approach that have not been covered in the previous questions?	No

Difficulty risk and temporal risk

Difficulty risk represents the degree of uncertainty in reaching the proposed target habitat type/ condition through a particular intervention. The multiplier reduces the overall biodiversity units if delivery is considered more uncertain. It is a negative multiplier (i.e. value = <1) which is prepopulated by the SPBM calculation tool for the habitat intervention and post-development habitat type. For some habitats in the SPBM, users can manually alter the difficulty risk applied, within the limits built within the tool, to appropriately reflect site-specific circumstances and management techniques proposed.

Temporal risk is a negative multiplier (i.e. value = <1) which is prepopulated by the SPBM calculation tool based on data input by the user, for example habitat type, intervention and habitat condition. The temporal risk multiplier accounts for the average time lag between the start of habitat intervention works and the target outcome being achieved. The time lag is known as 'time to target condition' (TTTC) and is shown in the SPBM in number of years, between 0 and 30+. The SPBM allows users scope to manually adjust prepopulated TTTC to appropriately reflect the site-specific circumstances and management techniques proposed.

All SPBM difficulty and temporal risk multipliers are listed in technical worksheets of the SPBM calculation tool and described in the 'Difficulty risk' and 'Temporal risk' sections of the SPBM user guide (within the 'Risk multipliers' section).

Table 13: Difficulty risk and temporal risk

To what extent do you agree that the pre-populated difficulty risk and temporal risk multipliers are set appropriately for the various habitat types and habitat interventions in the SPBM?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree

If you do not agree the pre-populated multipliers are appropriate, what specific changes would you propose and why?	N/A
To what extent do you agree that allowing users to modify prepopulated difficulty risk and temporal risk multipliers for select habitat interventions, depending on case-specific circumstances, is a suitable approach for the SPBM?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that the scope to modify prepopulated difficulty risk or temporal risk multipliers is suitable, what approach would you propose and why?	N/A
Do you have any additional comments on the difficulty risk or temporal risk approach that have not been covered in the previous questions?	No

Strategic significance

The strategic significance multiplier in the SPBM is structured to contain two different components: ecological connectivity and local ecological importance. The scores for the components are combined in the SPBM calculation tool (they are added together and then divided by two) to give an overall strategic significance score.

The highest scores are based on a habitat or an intervention aligning with priorities set out in a local strategy or plan document.

The SPBM strategic significance approach is described in the 'Strategic significance' section of the user guide.

Table 14: Strategic significance

To what extent do you agree the approach to the strategic significance multiplier is clear and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the approach is clear and fit for purpose, what specific changes would you propose and why?	N/A
To what extent do you agree that the criteria used for assigning high, medium, and low categories for the strategic significance multiplier (e.g. with high categories reliant on aligning with local strategy or plan documents) are appropriate for the purposes of the SPBM?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree

If you do not agree the criteria used are appropriate, what specific changes would you propose and why?	N/A
To what extent do you agree that the strategic significance multiplier should have two separately scored component parts, ecological connectivity and local ecological importance?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the strategic significance should have the two components, ecological connectivity and local ecological importance, what specific changes would you propose and why?	N/A
Do you have any additional comments on the strategic significance multiplier that have not been covered in the previous questions?	No

Habitat interventions

Three interventions are possible in the SPBM:

- Restoration – This is an intervention where the baseline habitat vegetation is preserved and managed to result in either: an increase in habitat condition whilst remaining within the same habitat type; or a change to a different habitat type but still within the same broad habitat group.
- Transition – This is an intervention where the baseline habitat vegetation is preserved and then allowed, through natural succession or management, to change to a different habitat type within a different broad habitat group than the baseline habitat type. A transition should only be used where ecologically appropriate and justified, rather than to any habitat desired.
- Creation – This is an intervention where the baseline habitat vegetation is to be lost (or removed), and post-development habitat is to be established (or re-established) to replace the loss.

The inclusion of a Transition intervention may encourage users to propose certain more ambitious and desirable interventions, that may otherwise not be tackled. When using the transition intervention, the baseline biodiversity units are not lost, as they would be if addressing the habitat change through the habitat creation intervention. This means that such habitat change delivers more units, than otherwise. Within the calculation tool this intervention has been constrained to certain habitat type changes to help prevent misuse.

The SPBM approach to habitat interventions is described in the 'Habitat interventions' section of the user guide.

Table 15: Habitat interventions

To what extent do you agree the SPBM habitat intervention types, particularly the	☐ Strongly agree ☑ Agree ☐ Unsure

inclusion of a Transition intervention, are appropriate and fit for purpose?	☐ Disagree ☐ Strongly disagree
If you do not agree the SPBM intervention types are appropriate and fit for purpose, what specific changes would you propose? Please provide detail on any elements of the tool you feel require additional work or refinement.	N/A

Table 16: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	None

Section F: Peatlands

This survey will address peatland considerations including the approach to difficulty risk, forest-to-bog restoration, indirect impacts, and peatland condition assessment.

To fully explore relevant background, all SPBM consultation documents (the calculation tool, user guide and habitat condition assessment sheets) are available on the NatureScot SPBM consultation webpage.

The SPBM approach to peatlands is covered in 'Appendix I – Peatland' of the user guide.

Peatlands

Peatlands are treated differently in the SPBM to other wetland habitats with, for example, a bespoke approach to the difficulty risk multiplier and indirect impacts.

For the purposes of the SPBM, the following habitat types are classed as 'peatlands':

- Blanket bog
- Lowland raised bog
- Montane bog

Deviation from a prepopulated high difficulty risk score can be informed by a decision framework based on restoration techniques used and type of peatland.

The SPBM has taken a bespoke approach to 'forest to bog' restoration, so that this is not disincentivised relative to other forms of peatland restoration. The SPBM includes a new habitat category, 'Forestry on peat soils (baseline F2B habitat)' which should only be used to classify baseline habitats where forest to bog restoration is planned for that area.

A distinct approach to indirect impacts has been taken in the SPBM for peatland habitats. To capture such impacts, an 'Indirectly impacted peat' habitat category has been included in the SPBM post-development calculation sheet. The same category can be used to input areas where excavated peat has been used from development.

The SPBM approach to peatlands is covered in 'Appendix I – Peatland' of the user guide.

Table 17: Peatlands

To what extent do you agree the approach to peatland habitats in the SPBM is clear, proportionate, and fit for the purposes of the metric?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the approach to peatlands is clear, proportionate, or fit for purpose, what specific changes would you make and why?	N/A
To what extent do you agree with the use of a flexible approach to the difficulty risk multiplier for proposed peatland habitats?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree with the use of a flexible approach, what specific changes would you make and why?	N/A
To what extent do you agree with the approach to forest-to-bog restoration in the SPBM?	☑ Strongly agree ☐ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree with the approach to forest-to-bog, what specific changes would you make and why?	N/A
To what extent do you agree with the approach taken to indirect impacts on peatland habitats in the SPBM?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree with the approach to indirect impacts, what specific changes would you make and why?	N/A
Do you have any additional comments on the treatment of peatlands in the SPBM that have not been covered in the previous questions?	No

Peatland habitat condition assessment

Peatland habitats within the SPBM have a separate condition assessment approach. They should be assessed using the Rapid Assessment Tool contained in Annex 1 of NaturesScot research report 1404 - Active Peatland and Peatland Condition.

The Rapid Assessment Tool is an Excel-based spreadsheet. Users should input into the spreadsheet observations on four categories:

- stiffness
- vegetation
- hydrology
- land use (including historical)

The Rapid Assessment Tool approach produces an overall condition score based on a series of positive and negative multipliers for each category.

Peatland considerations are described in 'Appendix I – Peatland' of the SPBM user guide.

Table 18: Peatland habitat condition assessment

To what extent do you agree that the Rapid Assessment Tool for assessing peatland condition is accessible, easy to use, and suitable for use with the SPBM?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the Rapid Assessment Tool is suitable, what specific changes would you make and why?	N/A
To what extent do you agree with assessing and scoring peatland condition based on the four categories of Stiffness, Vegetation, Hydrology, and Land Use?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree with the four categories and the criteria for scoring them, what specific changes would you make and why?	N/A
To what extent do you agree that it is clear how scores generated using the Rapid Assessment Tool should be input into the SPBM Calculation Tool?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that it is clear how scores are generated, what part of the process do you feel is unclear?	N/A
Do you have any additional comments on the peatland habitat condition assessment that	No

have not been covered in the previous questions?	

Table 19: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	There is lack of clarity surrounding funding for peatland restoration if this is required through planning conditions. Would a developer be able to access Peatland Action Funding or use the Carbon Code to fund restoration or would they be required to pay for this privately? If they do not have access to peatland restoration grants or funding, would this disincentivise peatland restoration?

Section G: Repowering and phased developments

This survey will address wind farm repowering and phased developments.

To fully explore relevant background, all SPBM consultation documents (the calculation tool, user guide and habitat condition assessment sheets) are available on the NatureScot SPBM consultation webpage.

Repowering and phased developments

We have set out SPBM advice on repowering and phased developments, particularly with regards to situations where a previous Habitat Management Plan (HMP) or similar plan area might be impacted by wind farm repowering or a phased planning application.

The approach to repowering and phased developments is described in 'Appendix J – Repowering and phased developments' of the user guide.

Table 20: Repowering and phased developments

To what extent do you agree that the SPBM approach for repowering and phased developments, detailed in Appendix J of the user guide, is appropriate and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that the approach to repowering and phased developments is appropriate, what specific changes or additional advice would you want and why?	N/A
Do you have any additional comments on the approach to repowering or phased developments that have not been covered in the previous questions?	No

Table 21: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	None

Section H: SPBM calculation tool

This survey will address biodiversity assessment boundary, the SPBM calculation tool, and how well the tool works as it is tested.

To fully explore relevant background, all SPBM consultation documents (the calculation tool, user guide, and habitat condition assessment sheets) are available on the NatureScot SPBM consultation webpage.

Biodiversity assessment boundary

The recommended approach for the SPBM is to assess a development's overall change in biodiversity unit (BU) value for all habitats contained within a 'biodiversity assessment boundary'. The biodiversity assessment boundary is defined as any on-site and off-site areas which are:

- negatively impacted by the development (both direct and indirect impacts)
- used to contribute towards BU delivery

To help ensure consistency of reporting, it is recommended that only habitats meeting this biodiversity assessment boundary criteria are recorded in the calculation tool. Doing so will mean that the SPBM will represent the change in biodiversity as percentage of all baseline BUs recorded within the biodiversity assessment boundary.

Habitat retention applies when there is no direct or indirect change in habitat type or condition arising from the development, and there are no post-development habitat interventions affecting the habitat. Retained habitats on-site or off-site do not need be included in the biodiversity assessment boundary.

The biodiversity assessment boundary is discussed in the 'Biodiversity assessment boundary' section of the user guide.

Table 22: Biodiversity assessment boundary

To what extent do you agree the use of a biodiversity assessment boundary (including only positively and negatively impacted areas) to assess overall biodiversity change and represent uplift in the SPBM is clear, proportionate, and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that the biodiversity assessment boundary should be used to calculate change, and as a basis for representing uplift, what specific changes would you make and why?	N/A

Do you have any additional comments on the biodiversity assessment boundary or representation of uplift that have not been covered in the previous questions?	No

SPBM calculation tool

The SPBM calculation tool is a Microsoft Excel spreadsheet that enables quantitative biodiversity assessment by calculating the habitat-based biodiversity changes that result from a development. It uses habitats as a proxy for wider biodiversity value. The tool derives biodiversity units (BUs) based on certain inputs and a multiplication formula. By comparing the number of pre-development (baseline) BUs with the number of post-development BUs, it helps show whether positive effects for biodiversity are being delivered.

The calculation tool is available on the NatureScot SPBM consultation webpage. An overview of the calculation tool is discussed in the 'Introduction' section of the user guide with explanation of its functionality detailed throughout.

Please download the calculation tool and start to explore its format and functionality. You can add real or hypothetical baseline habitat information and then start to fill in the habitat creation, restoration, or transition worksheets. This will help you understand how the tool works in terms of data entry, 'flags', results sheets, etc. It will provide you with a good basis for commenting.

Please let us know if there are aspects you like, or if there are elements you think we should add or refine. Whilst doing this please consider whether there appear to be any errors in the tool functionality. While we have tried to ensure full functionality within the consultation version SPBM, this is still an early build and so some errors may exist.

Table 23: SPBM calculation tool

To what extent do you agree the SPBM calculation tool is accessible, easy to use and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the SPBM calculation tool is accessible, easy to use, and fit for purpose, what specific changes would you propose? Please provide detail on any elements of the tool you feel require additional work or refinement.	N/A
To what extent do you agree that the headline and detailed results pages provide sufficient summary of a development's BU change and are fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that the headline and detailed results pages are fit for purpose,	N/A

what modifications would you like to see and why?	
Do you have any additional comments on the SPBM calculation tool that have not been covered in the previous questions?	No

Your testing outcomes

We would also like to know whether the calculation tool produces ecologically appropriate and sensible results, based on your testing and informed expectations. We want the SPBM to work in a balanced way that avoids unintended, or ecologically perverse, outcomes.

Also, let us know what you think works well, based on the overall approach and scoring levels. For example, will the SPBM appropriately incentivise creation of riparian woodland, given the new Riparian Woodland habitat type, scoring very high distinctiveness, medium difficulty risk, and with potential to be tackled as a Transition intervention?

Your testing results and ongoing feedback will help us refine the tool and guidance so that it delivers well for nature.

The calculation tool is available on the NatureScot SPBM consultation webpage.

If you wish to share your completed calculation tool, site data, or other information to evidence your feedback, you can email this to ScotBioMetric@nature.scot including a unique reference number, created by you, that you should also quote in your Commonplace response. The data you submit will not be shared outside of NatureScot's SPBM team and will be used exclusively to help inform improvements to the SPBM.

Table 24: Your testing outcomes

To what extent do you consider that the SPBM calculation tool produces ecologically appropriate and sensible results based on your testing and informed expectations?	☐ Strongly agree ☐ Agree ☑ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the SPBM calculation tool produces ecologically sensible results, in what respects does it fail, and what specific changes would you propose to help address the issues? Please provide detail on any aspects that require refinement. (You can separately send us a completed copy, or copies, of the calculation tool if you feel this helps. If you do, please include a unique reference number, created by you, in both your response here and in your email.)	The SPBM may provide positive ecological outcomes in the short term but without long-term management, habitat enhancement or creation may fail resulting in a net loss of biodiversity from development.
Do you have any additional comments based on your testing/trialling that have not been covered in the previous questions?	No

Table 25: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	None

Section I: SPBM guidance

This survey will address ease of use of the user guide, as well as seeking feedback on SPBM rules and principles, and on the user guide's explanation of how SPBM results should be considered in overall reporting on NPF4 policy 3b.

To fully explore relevant background, all SPBM consultation documents (the calculation tool, user guide and habitat condition assessment sheets) are available on the NatureScot SPBM consultation webpage.

User guide

The user guide has been written to provide a full and detailed explanation of how to use the SPBM.

To aid understanding it contains introductory sections to help users more quickly get to grips with the basics of the approach. This is designed for stakeholders who may have less experience using metrics or are looking to gain a quick insight. Several appendices provide targeted information, including supporting guidance for consenting authorities, specific habitat guidance, and an overview of key differences compared with the English statutory biodiversity metric.

In writing the user guide we have sought to provide fuller explanation than other metric guides.

There is some degree of duplication within the guide, allowing that some users will be visiting specific sections, and certain messages may therefore need to be repeated. The consultation user guide may contain some typographic errors, which will be addressed through our own internal review. We are seeking views on whether graphics and illustrations improve the user experience in version 1.

The user guide is available on the NatureScot SPBM consultation webpage.

Table 26: User guide

To what extent do you agree the user guide is clear, accessible, and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the user guide is clear, accessible, or fit for purpose, what specific changes would you propose? For example, provide detail on any section you feel require additional context or explanation.	N/A
To what extend do you agree the user guide provides you with adequate detail in respect	☐ Strongly agree ☑ Agree

to carrying out an SPBM calculation or reviewing the output?	☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the user guide provides adequate detail, what areas do you feel need additional explanation?	N/A
To what extent do you agree that graphics and photographs will make the user guide easier to navigate and interpret?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you have any suggestions on graphics or photographs that would be useful, please provide detail here.	None
Do you have any additional comments on the user guide that have not been covered in the previous questions?	No

SPBM guiding rules and SPBM principles

In common with other metrics, the SPBM sets out a series of metric-specific guiding rules and principles that should be followed to ensure appropriate and consistent use of the tool.

There are four overarching guiding rules and eight principles guiding best practice for use of the SPBM.

These principles and rules are discussed in the 'Guiding rules, trading rules and SPBM principles' section of the user guide.

Table 27: SPBM guiding rules and SPBM principles

To what extent do you that the SPBM guidance rules and SPBM principles are clear, proportionate, and fit for purpose?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree the SPBM guiding rules and SPBM principles are clear, proportionate, or fit for purpose, what specific changes would you make to any of the rules or principles and why?	N/A
Are there any additional rules or principles you would propose? Please provide specific detail and explain why.	No
Do you have any additional comments on the rules or principles that have not been covered in the previous questions?	No

Guidance on reporting on policy 3b

At various point in the user guide we offer advice on how to consider SPBM outputs alongside other relevant information relevant to policy 3b. This advice acknowledges limitations of the habitat-based metric, and that the overall summary should also draw on relevant species appraisal, and consideration of species-based biodiversity measures. There should also be a clear explanation of any professional ecological judgement applied.

For example, in the section on 'Qualitative biodiversity measures' there is discussion of how biodiversity measures in NatureScot's Developing with Nature guidance can be acknowledged more fully as part of wider qualitative assessment. Furthermore, in the same section, it is advised that Annex C of Developing with Nature can help provide an overall picture for demonstrating compliance with NPF4 policy 3b. This template can be adapted and used to show how appropriate measures have been included to deliver positive effects for biodiversity (in the absence of other structured reports or measures collating this evidence).

Table 28: Guidance on reporting on policy 3b

To what extent do you agree that the SPBM user guide provides appropriate advice on how to consider SPBM outputs alongside other relevant information relevant to policy 3b?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that the SPBM provides the right messages in terms of overall reporting on policy 3b, what specific changes would you make and why?	N/A

Table 29: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	None

Section J: Using the Scottish Planning Biodiversity Metric

This survey will provide an opportunity for any other feedback on the use of the SPBM. This includes whether any other advice or guidance might help support its use, and your thoughts on training and capacity building.

General questions

Please use this opportunity to provide any other feedback. For example, are there element of the overall approach that you support, or that you disagree with? The SPBM is supported by FAQs which can be found on NatureScot's SPBM webpage, however, there may be other advice, guidance, or information that you feel will aid implementation - if so, please let us know what this is, and why it will help.

Table 30: General questions

Do you have any additional comments on the SPBM that have not been covered in any of the other questions?	There are three key issues with the implementation of the metric to achieve significant enhancement for biodiversity: the metric is not statutory, it doesn't use a target uplift score and there is no management plan requirement, as required in the English BNG metric. England applies a 30-year management requirement to help secure the delivery and successful establishment of enhancements and interventions. The lack of a requirement in the Scottish metric and the absence of guidance on this matter means that it will be the responsibility of individual planning authorities to prepare guidance on management of various interventions. A nationwide requirement supported with guidance from NatureScot would provide clarity to planners and biodiversity officers across Scotland, as well as to developers. The metric is primarily a habitat metric which takes a quantitative approach to assessing the baseline habitat condition of a site and its future biodiversity value post-development. The metric uses habitats as a proxy for biodiversity while not fully considering the design, delivery and long-term management and care which will be the determining factors on the success of delivering a significant enhancement for biodiversity. The metric does not suitably address each of these key requirements to promote positive outcomes for biodiversity through development and may see existing habitat lost to development with new habitat and restored habitat degraded over time because of poor management.
Do you have any comments on any additional content, such as advice, guidance, or templates, that you consider would be helpful to help support implementation of the SPBM?	See above.

Capacity building

We appreciate that the success of the SPBM in supporting policy 3b depends on clear understanding of how it works and how to engage with it. We are planning capacity building to help develop this understanding.

Different users will have different needs, and we anticipate two main groups:

- Developers, their consultants and agents, using the SPBM to support a planning application, or application for consent.

- Planners in local authorities and the two National Parks, along with any others who will need to review SPBM calculations submitted as part of planning applications, or applications for consent.

Table 31: Capacity building

To what extent do you agree with our categorisation and prioritisation of users of the SPBM for delivery of capacity building?	☐ Strongly agree ☑ Agree ☐ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree with our categorisation or prioritisation, which other groups of people do you think we should be prioritising?	N/A
What do you think are the priority topics that each group of SPBM users need to know and understand?	The challenge is that the metric is a planning tool thus there is an expectation that planners will be able to interpret the results of an applicant's use of the metric. There is a need for a baseline level of training for planners both on the use and interpretation of the metric. Additionally, basic training on biodiversity is required to support planners understand what biodiversity means, how it can be delivered and sustained and how this translates to conditions, requirements, bonds and other planning mechanisms to secure significant enhancement of biodiversity and ensure applicants fulfil the requirements of Policy 3(b).
What do you think are the most effective ways we can deliver capacity building to different priority SPBM users with the limited time and resource available?	Online training sessions held by NatureScot, on-site visits to successful examples of biodiversity enhancement secured through development, regional meetings between planners and biodiversity officers to network and support authorities which may not have access to internal biodiversity expertise.
Do you have any additional comments on capacity building that have not been covered in the previous questions?	No

Supporting policy 3b

The SPBM has been developed for Scotland's planning system, to support delivery of National Planning Framework 4 (NPF4) policy 3b, which requires national or major development, or development that requires an Environmental Impact Assessment (EIA), to include significant biodiversity enhancements that leave nature in a demonstrably better state.

The assessment approach in Scotland may be qualitative or quantitative (for example through use of a metric). Until now, and in the absence of an established Scottish assessment approach, a range of methods, including variations of England's statutory biodiversity metric, have been used to measure biodiversity at a site level in Scotland. This lack of a standardised approach could lead to confusion

and inconsistencies. The SPBM has been created to help address this and to offer a consistent best practice approach for use across Scotland.

The main benefit of the SPBM is that, where used appropriately, it can help provide a consistent and transparent approach to calculating changes in biodiversity at a project level, in terms of habitat loss, compensation and enhancement.

How the SPBM supports delivery of NPF4 policy 3b is discussed throughout the user guide, but primarily in the 'Introduction' section of the guide.

Table 32: Support policy 3b

To what extent do you agree that the SPBM supports delivery of policy 3b?	☐ Strongly agree ☐ Agree ☑ Unsure ☐ Disagree ☐ Strongly disagree
If you do not agree that the SPBM will help to support delivery of policy 3b, what specific changes would you make and why?	The metric may be a useful tool for planning authorities in rural areas, including the National Parks. There is a concern that using habitats as a proxy for biodiversity means that urban areas, particularly cities and towns in peri-urban areas, may not realise the benefits of the metric with developers incentivised to off-set either within or potentially outwith the local authority boundary areas. There is a need for a qualitative assessment of proposals submitted and this is unfortunately lacking in the SPBM. It should be noted that biodiversity is incredibly difficult to measure. There is a risk that the tool oversimplifies the need for biodiversity enhancement for planners who may not be supported by biodiversity expertise. It is important that ongoing support, training and upskilling is provided by NatureScot to planning authorities so they know how to use the tool effectively. It is considered that the SPBM should be complemented by a Scottish Urban Greening Factor Metric or similar tool which can address the need to increase the quantity and quality of urban greening in new development to help meet multiple policies in NPF4.A UGF metric incentivises innovation in the use of nature-based solutions and blue and green infrastructure in development and provides a structured, measurable mechanism to assess contributions to surface water management, temperature regulation, air quality, landscape

	design and ecological connectivity, while helping create attractive, resilient, social and recreational spaces. A UGF can complement the SPBM by addressing the quantity, quality and distribution of blue and green infrastructure within development, while supporting wider environmental and social co-benefits, including delivering positive outcomes for biodiversity, climate adaptation and resilience, surface water flooding, urban cooling, and enhanced placemaking. It is considered that a UGF is necessary to 'accelerate urban greening' and respond to increasing urban and peri-urban development in the Central Belt as set out in the Regional Spatial Priorities for the 'Central' Area in NPF4 and support developers in meeting multiple NPF4 policies, such Policy 1, 14 and 20. The metric does not capture the importance of soil and other planting substrates, particularly for engineered blue and green infrastructure in urban development. Successful establishment of trees in particular relies on a healthy, complex soil ecosystem. Without measuring soil health and cultivating good soil ecology, enhancement features may not survive and could lead to a net loss of biodiversity on site.

Table 33: Additional thoughts

If you have any additional thoughts or questions that you felt weren't captured in this section of the consultation you can use the box to add them here.	None

Submitting your form

As noted at the start of this form, the Commonplace website is the online consultation portal chosen to host NatureScot's consultation on the SPBM and is our preferred route for receiving consultation responses. We strongly encourage all responses to be made through this platform. The platform facilitates easier analysis of responses and prevents any feedback being missed.

The form can be used to help people prepare for providing responses via the Commonplace website.

However, you can alternatively use this Word form to respond to the NatureScot consultation if you are struggling to use the Commonplace website.

If so, you can send this form by email or post.

Send by email

Send the completed form and any supporting documents to **ScotBioMetric@nature.scot**

Do not send zip files as these may be blocked by our security system.

Send by post

If you do not have access to email, you can print out and send your form to the address below.

NatureScot, Meadowbank House 6th Floor South, 153 London Road, Edinburgh, EH8 7AU