



APPLIED ECOLOGY

Navigating NPF4 in Non-EIA Projects

CIEEM NPF4 Policy Event
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Dr Rachel Hirst
CEcol CEnv FCIEEM





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Session Objectives

- How can we demonstrate NPF4 Policy 3 compliance for developers?
- What are our experiences of working with this policy to date?
- What can we learn from this and/or do better?





What does NPF4 Policy 3 require us to do?

- Policy 3a: your development will contribute to the enhancement of biodiversity (restore, build, strengthen)
- Policy 3b: what is needed for proposals requiring EIA
- Policy 3c: **local development** must include measures to conserve, restore and enhance biodiversity
- Policy 3d: potential adverse impacts must be minimised through careful planning and design





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What does NPF4 Policy 3 NOT say?

- No mention of the phrase “net gain”
- No mention of “metrics”
- N.b. this is not to say that these are not useful concepts or tools





What are our typical local development contexts?

- Definitely no “one size fits all”. Flexibility in the policy is therefore welcomed.
- Our urban non-EIA projects tend to be:
 - small-scale
 - local authority or housing association clients
 - brownfield or infill sites
- Our peri-urban or rural non-EIA projects tend to be:
 - small- and medium-scale
 - private sector





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Guidance? Or is it a free-for-all?

- NatureScot has their useful “Developing with Nature” guidance.
- In truth this should not be anything “new” to consultants but increases our sway with implementation.
- Scottish Government and NatureScot reviews of metrics.
- Professional judgement: is it proportionate, deliverable and likely to achieve aims beyond just policy compliance?





What is our role as consultants?

- Provide our clients with:
 - sound ecological baseline
 - proportionate and feasible proposals
 - proportionate analysis and robust reporting – tell the “story”
- Provide the LPA with reporting that:
 - is transparent and robust
 - is underpinned by good ecology
 - contains all the information needed to make a planning decision
 - recognises that not all LPAs have in-house ecological expertise





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Approaches

- Keeping it simple and reusing what we already have.
- Familiarity also useful for clients for buy-in, including with respect to pricing.
- Understanding and describing the limitations of approaches adopted – important for LPAs evaluating the merits of planning applications.
- See past the variable language used in LPA requests (standardising this would be useful)





Circling back to the Mitigation Hierarchy

- A full EclA should include a summary of mitigation. Ideally this should be linked to the Mitigation Hierarchy.
- Helpful for both the LPA and the client to see the process by which adverse impacts have been (i) avoided and (ii) reduced and the role of (iii) the enhancement.
- Mitigation Hierarchy summarises the **process**. A quantitative (metric) or qualitative comparison summarises the **potential outcome**. Both are useful.





Summary

- Various methods for demonstrating compliance with NPF4 Policy 3 – this is fine because no one size fits all.
- Important to keep in mind the purpose of the assessment and what the LPA needs to know.
- Proposals need to be deliverable and fit for purpose, including long-term management and/or monitoring.
- Important also to be clear about limitations and share views on practice.

