

Biodiversity Net Gain (BNG)



HTA Briefing

Introduction

UK Environmental Horticulture is key for delivering clean air, habitat for wildlife and mitigating the impacts of climate change. Horticulture is a key stakeholder for many nature-based solutions and, through utilising the knowledge and best practice of the sector, will help deliver BNG regulations.

Wildlife and biodiversity

By supplying plants, trees and food for wildlife we help to maintain UK biodiversity. Our industry supports wildlife across the breadth of the terrestrial food web. All the living creatures on Earth rely on pollinators – the health of our ecosystem services is determined by the health of pollinator populations.

Biodiversity underpins the entire ecosystem of the UK – protecting it is a national priority. Through properly designed and managed green space, biodiversity gain can be supported and accelerated.

Protected horticulture (glass houses)

Glass house growing takes up a large area and would likely be subject to the highest costs due to the size of their operations. Within these premises plants and trees which could be used to deliver BNG are produced. Without an exemption, glass house growers will likely be forced to reduce their production capacity. This will impact the sectors ability to deliver the plants and trees required to meet the goals of the Governments Environmental Improvement Plan 2023 (EIP23). Modern protected horticultural structures, known as CEFs (Controlled Environment Facilities) are not buildings. They cost around £2m per hectare for tomato production and require flat land. Adding more land to meet BNG requirements could limit development.

Key asks for Parliament & Policy Makers

- Establish an exemption for Protected Horticultural growers (glasshouse growing) from BNG regulations.
- Environmental horticulture must be recognised as a key stakeholder for delivering BNG.
- Local Planning Authorities should utilise industry expertise to facilitate BNG delivery and protect UK biosecurity through best practice.
- Create a Government Office for Green Spaces - a cross-government group tasked to maximise the value of Green Spaces in all aspects of policy-making and regulatory impact assessments.
- Increase UK production capacity to deliver the necessary plants and trees for public procurement targets.
- Collaborate with industry to identify skills gaps to ensure the future workforce are equipped to deliver the significant volume of trees and plants that are required to deliver EIP23 goals.
- Accredited BNG training must be developed for every stakeholder involved in the delivery and maintenance of BNG.
- Undertake a consultative review of the Biodiversity Net Gain 4.0 metric and develop the Green Infrastructure Framework to account for the beneficial role of the full range of cultivated plants and landscapes.
- Support the creation and adoption of new measurement tools suitable for cultivated plant genetic diversity and landscapes, boosting nature-based solutions in a changing climate.

About Us

The Horticultural Trades Association (HTA) represents nearly 1400 members in the Environmental Horticulture sector including; garden centre retailers, tree and plant growers, goods manufacturers, landscapers, and service providers.

Our industry supports nearly 700,000 jobs, has a national GDP of £28.8 billion, mitigates climate change and benefits health and wellbeing for 30 million gardeners in the UK.

Further Information

For further information contact the HTA policy Team via email at policy@hta.org.uk and visit hta.org.uk/policy

Challenges identified with BNG delivery

The objectives of Biodiversity Net Gain are widely welcomed (BNG) but its implementation, the complexity of the metric and enforcement mechanisms have raised a lot of questions.

Given the number of different stakeholders that must be involved in the planning process to ensure BNG gains are secured and maintained, there needs to be clarity in the following areas:

- which party is liable should 10% BNG fail to be upheld for the full 30 years.
- which body is responsible for ensuring that the BNG gains are practically delivered and maintained for the full 30 years. Ideally, these gains for nature should be permanently secured and, without a mechanism to protect BNG gains, particularly on-site gains, there is a risk that gains for nature could be lost after the 30 years.

Skills & workforce

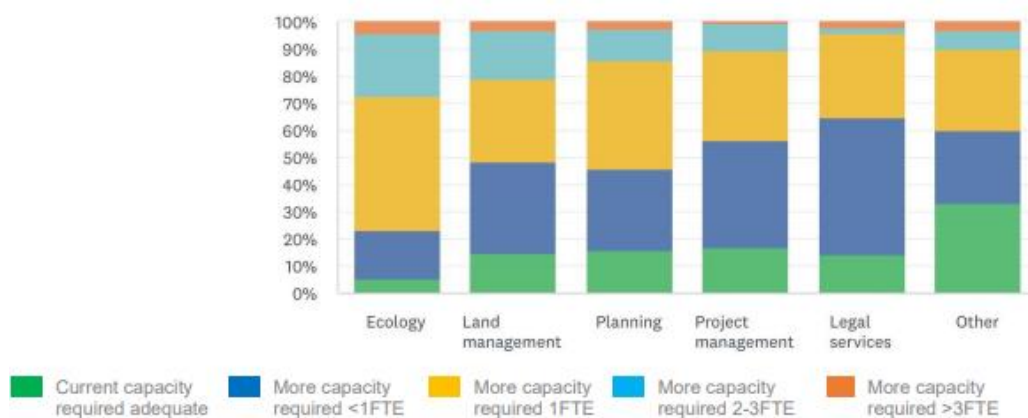
It is also important to note that without an accredited BNG training for maintenance staff, an increase in trained ecologists with the expertise to work with the metric, and increased and sustained funding for Local Authorities to enforce this regulation, delivering BNG outcomes to all of the new sites the government plans to develop will be hugely challenging. The role and importance of the wider environmental horticulture sector must also be fully considered – labour shortages, skills gaps, wages increases, challenges posed by cross border trade and the transition to peat free growing are all posing challenges to the ability of the sector to grow the trees and plants that are so vital for the delivery of BNG.

Biodiversity Metric

Current methods to measure biodiversity gain (Biodiversity Net Gain 4.0 metric and Green Infrastructure Framework) do not take account of the full range of cultivated plants and gardens. As such, we recommend:

- Undertake a consultative review of the Biodiversity Net Gain 4.0 metric and develop the Green Infrastructure Framework to account for the beneficial role of the full range of cultivated plants and landscapes; and
- Support the creation and adoption of new measurement tools suitable for cultivated plant genetic diversity and landscapes, boosting nature-based solutions in a changing climate.

Adequacy of existing staff resources for BNG



Source: Snell, L. and Oxford, M. (2022) *Survey of LPAs Ability to Deliver Biodiversity Net Gain in England. Do LPAs currently have the necessary expertise and capacity?* <https://www.alge.org.uk/wp-content/uploads/sites/15/2022/06/ALGE-ADEPT-Report-on-LPAs-and-BNG-2022.pdf>