

Scottish Planning Biodiversity Metric

NatureScot Consultation

To: All Chief Executives, Main Contacts and APSE Contacts in Scotland.
For information only: England, Northern Ireland and Wales.

1 Executive summary

NatureScot is consulting on the Scottish Planning Biodiversity Metric (SPBM), a new quantitative assessment tool intended to support the implementation of [National Planning Framework 4](#) (NPF4) Policy 3b. The consultation seeks views on the consultation version of the metric, its accompanying user guide and habitat condition assessment methodology. Following consideration of responses, NatureScot expects to publish Version 1 of the SPBM in Spring 2027.

NPF4 Policy 3b requires national developments, major developments and developments subject to Environmental Impact Assessment (EIA) to demonstrate significant biodiversity enhancement, with proposals expected to conserve, restore and enhance biodiversity so that it is in a demonstrably better state than without intervention. The policy does not prescribe a particular metric, and NatureScot has therefore developed the SPBM as a consistent best-practice quantitative approach for those wishing to use a metric to demonstrate biodiversity enhancement.

The SPBM has been adapted from the English statutory biodiversity metric to reflect Scotland's distinct environment and policy context. It uses habitats as a proxy for wider biodiversity value and calculates changes in biodiversity through Biodiversity Units (BUs), taking account of factors including habitat area, distinctiveness, condition and location. NatureScot emphasises that the SPBM is intended to inform professional judgment rather than replace it, and that its application in Scotland will differ from the statutory approach used in England.

For local authorities, the development of a standardised Scottish metric has implications for both planning and management of council-owned land and greenspaces. Planning authorities will need to understand how the metric can be used when assessing development proposals, while parks, grounds, estates and environmental services may have opportunities to contribute to biodiversity enhancement through the management of existing land assets.

APSE encourages Scottish local authorities to consider the consultation from both perspectives and

to provide practical feedback based on their experience of planning, managing open spaces and delivering biodiversity improvements. In particular, councils may wish to consider whether the proposed metric is sufficiently clear and practical for use by local authority officers, how it interacts with existing council responsibilities and resources, and whether it appropriately reflects the opportunities and constraints associated with managing public sector land. Responses are due by **Monday 30 November 2026**.

[Click here](#) for further information and to submit your response.

[Click here](#) to read the full report.

2 Overview

The Scottish Planning Biodiversity Metric (SPBM) is being developed by NatureScot following a commission from the Scottish Government. It is intended to provide a consistent, best-practice approach for assessing biodiversity change and to support delivery of [National Planning Framework 4](#) (NPF4) Policy 3b.

Policy 3b states that national and major developments, as well as developments subject to Environmental Impact Assessment (EIA), will only be supported where it can be demonstrated that significant biodiversity enhancement will be provided. Developments should conserve, restore and enhance biodiversity, including nature networks, so that biodiversity is in a demonstrably better state than it would have been without intervention.

Policy 3b does not require applicants to use a particular biodiversity metric. In the absence of an established Scottish approach, a range of methods have been used to assess biodiversity change, including adaptations of the [English statutory biodiversity metric](#). NatureScot identified that this could create confusion and inconsistency and has consequently developed the SPBM as a standardised, best-practice quantitative approach for use within the Scottish planning system.

The development of the SPBM follows a [2024 NatureScot consultation](#) on the key issues that should be addressed when developing a Scottish metric. Respondents to the 2024 consultation, including 13 Scottish local authorities and the Loch Lomond & The Trossachs National Park Authority, raised issues including habitat classification, habitat condition, irreplaceable habitats, strategic significance, and the practical operation of the metric.

2.1 The Scottish Planning Biodiversity Metric

The SPBM is a quantitative tool which uses habitats as a proxy for biodiversity. It calculates Biodiversity Units (BUs) based on characteristics including habitat type, area and condition, allowing changes to habitats before and after development to be assessed.

The metric is intended to support decision-making by providing a way of quantifying biodiversity change and communicating this between developers, ecologists, planners and other relevant stakeholders. NatureScot highlights that using the metric at an early stage of development can also

help identify higher-value habitats and support the application of the mitigation hierarchy by encouraging developers to consider how impacts can be avoided or reduced.

The SPBM has been informed by the English statutory biodiversity metric, but has been adapted to reflect the Scottish planning and environmental context. NatureScot emphasises that the Scottish approach will differ from the English system, reflecting the different policy and legislative frameworks in Scotland and England.

Importantly, the SPBM will not introduce a Scottish equivalent of England's statutory biodiversity net gain requirement. Rather, it is intended to provide a consistent tool that can be used to support the assessment of biodiversity enhancement under NPF4 Policy 3b. The use of a metric remains one possible approach to demonstrating biodiversity enhancement, alongside qualitative assessment and other relevant evidence.

The consultation version consists of a user guide, calculation tool and habitat condition assessment sheets. NatureScot is seeking feedback on these materials before producing the final Version 1 of the metric.

2.2 Habitat classification and condition assessment

Habitat classification and condition assessment are important components of the SPBM, as these factors contribute to the calculation of Biodiversity Units.

NatureScot proposes to retain the [UK Habitat Classification](#) (UKHab) as the underlying basis for terrestrial habitat categories within the metric. However, the approach has been adapted to better reflect Scottish habitats, with limited use of the [National Vegetation Classification](#) (NVC) proposed where this can help distinguish between habitat categories, particularly within semi-natural and upland ecosystems.

The proposed approach follows an independent review commissioned by NatureScot, which considered habitat classification systems that could be used within a Scottish planning biodiversity metric. The review highlighted the need for modifications to existing approaches, including greater consideration of upland habitats.

The SPBM also includes a proposed approach to assessing habitat condition. This is intended to assess the quality of habitats against their ecological optimum and contributes to determining the biodiversity value of a site. NatureScot is consulting on habitat condition assessment sheets alongside the wider metric.

There is also a specific proposed approach for peatland habitats. The consultation version of the SPBM uses the [Field-based Rapid Assessment Tool for Peatland Habitats](#), developed by the University of the Highlands and Islands, as its proposed peatland condition assessment methodology. NatureScot intends to undertake further testing and refinement before developing the Version 1 approach.

These aspects of the metric are particularly relevant to the consultation, as the earlier 2024 consultation highlighted the importance of ensuring that habitat classification and condition assessment adequately reflect Scotland’s biodiversity. Respondents also called for condition assessment sheets and supporting guidance to be clear and straightforward to use.

2.3 Implications for local authorities

The SPBM is particularly relevant to local authorities because of their role as planning authorities and their involvement in assessing development proposals under NPF4. A consistent approach to measuring biodiversity change could help planning authorities consider the biodiversity enhancement associated with relevant development proposals.

The metric may also be of interest to council services involved in the management of parks, grounds, open spaces and other land, particularly where biodiversity enhancement forms part of wider land management or development activity.

However, the SPBM remains a consultation version and its final form is yet to be confirmed. NatureScot is specifically seeking feedback on how the metric and supporting materials work in practice, providing an opportunity for local authorities to identify any issues they may encounter in using or interpreting the proposed approach.

NatureScot has also recognised that there will need to be a degree of flexibility during the transition towards the SPBM. NPF4 Policy 3b does not currently specify a particular metric, and existing guidance allows for qualitative or quantitative approaches to biodiversity assessment. NatureScot therefore anticipates a transition towards the SPBM for those wishing to use a quantitative approach, rather than an immediate replacement of existing approaches.

3 Consultation questions

The consultation questions are categorised as follows:

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The consultation questions are available in full below:

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.

1. Would you like your response to be confidential?
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
2. Are you responding as part of an organisation?
Yes; No
3. If so, what is the name of the organisation?
4. 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
5. Do you have experience of using any other biodiversity metric?
Yes; No
6. If so, which metrics and how would you describe your level of experience?
7. If you would be happy to potentially be contacted by the NatureScot team about your response, please include your name and email address.

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.

8. 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
9. 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?
10. 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.

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 are 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.

11. 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
12. If you do not support the SPBM approach to habitat categorisation, what changes would you suggest, and why?
13. 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
14. 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?
15. Do you have any additional comments on the SPBM habitat classification approach that have not been covered in previous questions?

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.

16. 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
17. If you do not support the SPBM approach to disabling the create function for certain habitats, what changes would you suggest, and why?
18. 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
19. If you do not support the selection of habitat types where the creation function is disabled, what changes would you suggest, and why?

20. Do you have any additional comments on the SPBM approach to disabling the create 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.

21. 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
22. If you do not support the habitat condition assessment sheets and/or individual condition assessment criteria, what specific changes would you make and why?
23. 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
24. If you do not find the habitat condition assessment easy to understand or navigate, what specific changes would you make and why?
25. Do you have any additional comments on habitat condition assessment that have not been covered in previous questions?

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.

26. 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
27. If you do not agree that this basis for assigning distinctiveness is appropriate and fit for purpose, what specific changes would you make, or new factors would you include, and why?
28. 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
29. If you do not agree that these categories are appropriate, what specific changes would you make and why?
30. 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
31. If you do not agree the habitats are assigned to the correct distinctiveness category, which habitats would you reassign, to which distinctiveness category would you assign them, and why?
32. Do you have any additional comments on the distinctiveness categories that have not been covered in the previous questions?
33. 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.

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.

34. 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

35. If you do not agree with the approach to categorising trees based on distinctiveness level, what specific changes would you make and why?

36. To what extent do you agree with the criteria for categorising trees into different distinctiveness levels?

Strongly agree; Agree; Unsure; Disagree; Strongly disagree

37. If you do not agree with the criteria for categorising trees into different distinctiveness levels, what specific changes would you make and why?

38. Do you have any additional comments on the approach to tree type and distinctiveness that have not been covered in the other questions?

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.

39. 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
40. If you do not agree with the approach to calculating canopy area as an average ellipse, what specific changes would you make and why?
41. 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
42. If you do not agree with the approach to calculating post-development BUs for individual trees, what specific changes would you make and why?
43. Do you have any additional comments on the approach to calculating baseline canopy area and post-development calculations that have not been covered in any of the other questions?
44. 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.

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).

45. 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
46. If you do not agree that this approach supports the policy preference for on-site delivery, what specific changes would you make and why?
47. 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
48. If you do not agree that this provides an appropriate incentive, what multiplier value would you propose and why?
49. Do you have any additional comments on the spatial risk approach that have not been covered in the previous questions?

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).

50. 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
51. If you do not agree the pre-populated multipliers are appropriate, what specific changes would you propose and why?
52. 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
53. 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?
54. Do you have any additional comments on the difficulty risk or temporal risk approach that have not been covered in the previous questions?

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.

55. 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
56. If you do not agree the approach is clear and fit for purpose, what specific changes would you propose and why?
57. 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
58. If you do not agree the criteria used are appropriate, what specific changes would you propose and why?

59. 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
60. 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?
61. Do you have any additional comments on the strategic significance multiplier that have not been covered in the previous questions?

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.

62. To what extent do you agree the SPBM habitat intervention types, particularly the inclusion of a Transition intervention, are appropriate and fit for purpose?
Strongly agree; Agree; Unsure; Disagree; Strongly disagree
63. 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.
64. 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.

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.

65. 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

66. If you do not agree the approach to peatlands is clear, proportionate, or fit for purpose, what specific changes would you make and why?

67. 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

68. If you do not agree with the use of a flexible approach, what specific changes would you make and why?

69. To what extent do you agree with the approach to forest-to-bog restoration in the SPBM?

Strongly agree; Agree; Unsure; Disagree; Strongly disagree

70. If you do not agree with the approach to forest-to-bog, what specific changes would you make and why?
71. 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
72. If you do not agree with the approach to indirect impacts, what specific changes would you make and why?
73. Do you have any additional comments on the treatment of peatlands in the SPBM that have not been covered in the previous questions?

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.

74. 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
75. If you do not agree the Rapid Assessment Tool is suitable, what specific changes would you make and why?
76. 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
77. If you do not agree with the four categories and the criteria for scoring them, what specific changes would you make and why?
78. 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

79. If you do not agree that it is clear how scores are generated, what part of the process do you feel is unclear?

80. Do you have any additional comments on the peatland habitat condition assessment that have not been covered in the previous questions?

81. 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.

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.

82. 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

83. 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?

84. 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.

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.

85. 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

86. 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?

87. Do you have any additional comments on the biodiversity assessment boundary or representation of uplift that have not been covered in the previous questions?

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.

88. 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

89. 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.

90. 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

91. If you do not agree that the headline and detailed results pages are fit for purpose, what modifications would you like to see and why?

92. Do you have any additional comments on the SPBM calculation tool that have not been covered in the previous questions?

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.

93. 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

94. 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.)
95. Do you have any additional comments based on your testing/trialling that have not been covered in the previous questions?
96. 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.

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](#).

97. To what extent do you agree the user guide is clear, accessible, and fit for purpose?
Strongly agree; Agree; Unsure; Disagree; Strongly disagree
98. 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.
99. To what extent do you agree the user guide provides you with adequate detail in respect to carrying out an SPBM calculation or reviewing the output?
Strongly agree; Agree; Unsure; Disagree; Strongly disagree

100. If you do not agree the user guide provides adequate detail, what areas do you feel need additional explanation?
101. 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
102. If you have any suggestions on graphics or photographs that would be useful, please provide detail here.
103. Do you have any additional comments on the user guide that have not been covered in the previous questions?

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.

104. To what extent do you think that the SPBM guidance rules and SPBM principles are clear, proportionate, and fit for purpose?
Strongly agree; Agree; Unsure; Disagree; Strongly disagree
105. 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?
106. Are there any additional rules or principles you would propose? Please provide specific detail and explain why.
107. Do you have any additional comments on the rules or principles that have not been covered in the previous questions?

Guidance on reporting on policy 3b

At various points 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).

108. 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
109. 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?
110. 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.

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.

111. Do you have any additional comments on the SPBM that have not been covered in any of the other questions?
112. 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?

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.

113. 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

114. If you do not agree with our categorisation or prioritisation, which other groups of people do you think we should be prioritising?
115. What do you think are the priority topics that each group of SPBM users need to know and understand?
116. 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?
117. Do you have any additional comments on capacity building that have not been covered in the previous questions?

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.

118. To what extent do you agree that the SPBM supports delivery of policy 3b?
Strongly agree; Agree; Unsure; Disagree; Strongly disagree
119. If you do not agree that the SPBM will help to support delivery of policy 3b, what specific changes would you make and why?
120. 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.

4 APSE comment

APSE welcomes the opportunity for Scottish local authorities to contribute to the development of a consistent approach to assessing biodiversity enhancement through the planning system. The SPBM has the potential to provide greater clarity and consistency for councils when considering biodiversity impacts associated with development, while also helping to connect planning decisions

with the practical management and enhancement of land and greenspaces.

The relevance of this issue to local authority parks and grounds services was explored earlier this year at the [APSE Scotland Fleet, Waste and Grounds Seminar 2026](#) in Aviemore. Fiona Sutton-Wilson, Head of APSE Training, delivered a presentation on '[Biodiversity Net Gains for parks and green spaces](#)', examining the growing relevance of biodiversity net gain to parks and greenspace professionals and the opportunities available to local authorities through the management of their land assets. The presentation highlighted the importance of understanding existing biodiversity values, identifying land with potential for enhancement and developing a clear route from biodiversity ambition through to delivery and long-term management.

The development of the SPBM is therefore not only relevant to planning services, but also to local authority teams involved in parks, grounds, estates, open spaces and land management. The consultation provides an opportunity for these services to consider how the proposed approach may relate to their work and to highlight any practical considerations they feel should be taken into account.

APSE encourages local authorities to engage with NatureScot's consultation and to provide practical feedback from across their services. Councils may wish to consider whether the proposed metric is sufficiently clear and workable for planning authorities, whether its approach to habitat classification and condition assessment reflects the realities of Scottish local authority land, and what support, skills and resources will be required to translate metric outputs into meaningful biodiversity improvements on the ground. Given the SPBM remains a consultation version, this is an important opportunity for local authorities to help shape an approach that is both environmentally credible and practical to deliver.

5 How can APSE help?

This topic will be discussed and reviewed through the APSE Scotland Parks, Grounds and Streets Network, with local authorities having the opportunity to share thoughts and views on this proposed metric. APSE Training also provide a variety of training courses including the upcoming [Biodiversity Net Gain for Local Authority Parks and Green Spaces](#) on the 6 October which may also be beneficial to those interested in this consultation.

All APSE members can access the APSE Scotland network, which provides updates, information, and opportunities to engage with colleagues across local government in Scotland. Members can keep up to date with regional activities, events, policy developments, and networking opportunities by visiting the Scotland members' area. You can access the network using this link: [APSE Scotland](#)

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APSE member authorities have access to a range of membership resources to assist in delivering council services. This includes our regular network meetings, specifically designed to bring together elected members, directors, managers and heads of service, together with trade union representatives to discuss service specific issues, innovation and new ways of delivering continuous improvement. The networks are an excellent forum for sharing ideas and discussing topical service issues with colleagues from other councils throughout the UK.

Networks are a free service included as part of your authority's membership of APSE and all in-person networks end with an informal lunch to facilitate networking with peers in other councils. If you do not currently receive details about APSE Network meetings and would like to be added to our list of contacts for your service area, please email enquiries@apse.org.uk

Our national networks include:-

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- Catering (School Meals)
- Cemeteries and Crematoria
- Highways and Street Lighting
- Housing, Construction and Building Maintenance
- Social Value, Procurement and Commercialisation Network
- Parks, Horticulture and Grounds Maintenance
- Renewables and Climate Change
- Roads, Highways and Street Lighting
- Sports and Leisure Management
- Vehicle Maintenance and Transport
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