

Anglian Water's response to the consultation on Biodiversity Net Gain Regulations and Implementation

05.04.2022

Question 1

Do you agree with our proposal to exempt development which falls below a de minimis threshold from the biodiversity net gain requirement?

a) for area-based habitat:

- **Yes** (which of the following thresholds do you think is most appropriate: 2m² , 5m² , 10m² , 20m² , 50m² , **other** threshold – please specify) No (please explain why not)
- Do not know

Anglian Water agrees with the proposed exemption for development below a de minimis threshold. There are some construction activities that Anglian Water may deliver, such as new property connections, kiosk installation and emergency safety showers that we consider would be suitable for exemption. However, given Anglian Water's role as critical infrastructure provider much of our development activity is subject to permitted development rights and therefore exempted under the Town and Country Planning Act 1990, as amended by the Environment Act 2021.

Anglian Water has a voluntary biodiversity net gain (BNG) business plan commitment, under which it exempts developments below a 0.05 hectare threshold. Through the Environment Act requirements these projects would be subject to the Defra Small Sites Metric. We would also welcome guidance on how a de minimis threshold would apply to phased developments.

We would also like to highlight additional consideration for projects where different elements would be subject to a combination of permitted development rights and planning permission requirements. There may be a risk that a developer focuses the elements subject to planning permission on lower distinctiveness habitats/sealed surfaces and the elements subject to permitted development rights on habitats with a higher distinctiveness.

b) for linear habitat (hedgerows, lines of trees, and watercourses):

- **Yes** (which of the following thresholds you think is most appropriate: 2m, 5m, 10m, 20m, 50m, **another threshold – please specify**)
- No (please explain why not)
- Do not know

Anglian Water agrees with the proposed de minimis threshold for linear habitats. 20m length is used in other hedgerow regulations, so Anglian Water considers that it may be appropriate to bring the two sets of legislation in line.

Anglian Water has a voluntary biodiversity net gain business plan commitment under which it scopes-out any development that takes place on land not owned by Anglian Water, such as cross-country pipelines. We have recognised some challenges in relation to delivering biodiversity net gain on projects that take place on third-party land, and particularly farmland, where we must reinstate the land afterwards. In these cases, where biodiversity net gain applies, we would often have to deliver the gains required through off-site offsets with the associated cost impacts.

The biodiversity metric allows for temporary losses to be disregarded when the original baseline habitat will be restored to the same or better condition within 2 years of the loss, and this may be relevant to some pipeline projects. However, the application of a de minimis threshold could include linear projects where a de minimis threshold is assigned to width for medium and low distinctiveness habitats.

Question 2

Do you agree with our proposal to exempt householder applications from the biodiversity net gain requirement?

- Yes
- No (please explain why not)
- Other (please tell us more)
- Do not know

Anglian Water doesn't have a position on this.

Question 3

Do you agree with our proposal to exempt change of use applications from the biodiversity net gain requirement?

- Yes
- No (please explain why not)
- Other (please tell us more)
- Do not know]

Anglian Water agrees with this proposal. Anglian Water does on occasion submit applications for changes to the use of its existing buildings, and does not consider that such proposals would adversely impact BNG.

Question 4

Do you think developments which are undertaken exclusively for mandatory biodiversity gains should be exempt from the mandatory net gain requirement?

- Yes, only for biodiversity net gain (please explain why)
- Yes, also for some other environmental mitigation purposes (please explain why)
- No (please explain why not)
- Other (please tell us more)
- Do not know

Anglian Water agrees with the principle of this proposal but considers that developments that are undertaken exclusively for mandatory biodiversity gains should be subject to a no net loss (0%) requirement rather than an exemption altogether. Creation of habitat may result in loss of another,

and this should be part of the overall calculation for the biodiversity gain sites. Therefore, a no net loss target would be appropriate.

Projects purely for BNG should contribute to the Local Nature Recovery Strategy.

Question 5

Do you think self-builds and custom housebuilding developments should be exempt from the mandatory net gain requirement?

- Yes (please explain why)
- No (please explain why not)
- Other (please tell us more)
- Do not know

Anglian Water does not have a view on this question.

Question 6

Do you agree with our proposal not to exempt brownfield sites, based on the rationale set out above?

- Yes
- No (please explain why not)
- Other (please tell us more)
- Do not know

Anglian Water agrees with this proposal as other exemptions would be applicable i.e., no biodiversity net gain requirement on areas with a baseline biodiversity unit score of 0, 'de minimis' threshold.

Question 7

Do you agree with our proposal not to exempt temporary applications from the biodiversity net gain requirement?

- Yes
- No (please explain why not)
- Other (please tell us more)
- Do not know

Yes, because Anglian Water use temporary applications in some circumstances (e.g., large scale essential infrastructure projects) and these may exceed 2 years.

Question 8

Do you agree with our proposal not to exempt developments which would be permitted development but are not on account of their location in conservation areas, such as in areas of outstanding natural beauty or national parks?

- Yes
- No (please explain why not)
- Other (please tell us more)
- Do not know

Anglian Water believes that BNG is a brilliant step forward for the environment and we don't want to introduce exceptions unnecessarily. However, we need to balance this with our responsibility to deliver affordable clean water and wastewater services to our customers. Therefore, to ensure standardisation we consider that exemptions for development located in conservation areas etc should still be applied and be dependent on the size of development.

Question 9

Are there any further development types which have not been considered above or in the previous net gain consultation, but which should be exempt from the biodiversity net gain requirement or be subject to a modified requirement?

- Yes, exempt (please explain which development types and why they should be exempt)
- Yes, a modified requirement (please explain which development types and why they should face a modified requirement)
- No
- Other (please tell us more)
- Do not know

Anglian Water is a statutory undertaker for the provision of water and waste infrastructure. Along with other water companies and other utility companies it has a key role to play in supporting housing and employment growth. One of the key challenges which Anglian Water faces, along with other utility providers is in relation to the installation of new assets. These installations take place on third party land, often in multiple ownerships, over which Anglian Water has no long-term control. Unlike other developments the nature of the land will not change once the development is complete and in the majority of cases will be returned to agricultural use.

As such, in these cases we might have to deliver off site offsetting. There is an opportunity for these types of projects to contribute to Local Nature Recovery Strategies and to partner with NGOs.

The Environment Act mandatory requirement for BNG comes into effect mid-AMP (investment cycle) for the water sector and so BNG is not funded as part of our current business plan (2020-2025).

Question 10

Do you agree with our proposal not to exempt development within statutory designated sites for nature conservation from the biodiversity gain requirement?

- Yes
- No (please explain why not)
- Other (please tell us more)
- Do not know

Anglian Water agrees with the proposal not to exempt designated sites. We are sometimes required to deliver construction activities in statutory designated sites and recognise that biodiversity net gain delivery in these cases would be additional to the existing legal or policy requirements.

Question 11

Do you agree with the stated proposals for development (or component parts of a development) on irreplaceable habitats, specifically:

a) The exclusion of such development from the quantitative mandatory biodiversity gain objective?

- Yes
- No (please explain why not)
- Do not know

b) The inclusion of a requirement to submit a version of a biodiversity gain plan for development (or component parts of a development) on irreplaceable habitats to increase proposal transparency?

- Yes
- No (please explain why not)
- Do not know

c) Where there are no negative impacts to irreplaceable habitat, to allow use of the biodiversity metric to calculate the value of enhancements of irreplaceable habitat?

- Yes
- No (please explain why not)
- Do not know

d) To use the powers in biodiversity net gain legislation to set out a definition of irreplaceable habitat, which would be supported by guidance on interpretation?

- Yes
- No (please explain why not)
- Do not know

e) The provision of guidance on what constitutes irreplaceable habitat to support the formation of bespoke compensation agreements?

- Yes
- No (please explain why not)
- Do not know

PART 2

Question 12

Do you agree with our proposed approach that applications for outline planning permission or permissions which have the effect of permitting development in phases should be subject to a condition which requires approval of a biodiversity gain plan prior to commencement of each phase?

- Yes
- No (please explain why not)
- Do not know

Question 13

Do you agree with the proposals for how phased development, variation applications and minerals permissions would be treated?

- Yes
- No (please suggest alternative approaches)
- Do not know

Question 14

Do you agree that a small sites metric might help to reduce any time and cost burdens introduced by the biodiversity gain condition?

- Yes
- No (please explain why not)
- Other (please tell us more)
- Do not know

Question 15

Do you think a slightly extended transition period for small sites beyond the general 2- year period would be appropriate and helpful?

- Yes, a 12-month extension (please explain why)
- Yes, a 6-month extension (please explain why)
- No (please explain why not)
- Other (please tell us more)
- Do not know

Anglian Water does not believe this would be helpful, as our ongoing construction activities are likely to be a combination of small and large developments and we would want to implement a standard and consistent approach across our different delivery routes within the business.

Question 16

Are there any additional process simplifications (beyond a small sites metric and a slightly extended transition period) that you feel would be helpful in reducing the burden for developers of small sites?

- Yes (please outline your suggestion and explain how it would help)
- No
- Do not know

Nationally Significant Infrastructure Projects

Question 17

Are any targeted exemptions (other than that for irreplaceable habitat), reduced biodiversity net gain objectives, or other modified requirements necessary for the application of the biodiversity net gain requirement to NSIPs?

- Yes, exemption (please define your proposed exemption)
- Yes, percentage reduction (please define your proposed reduction)
- Yes, other modified requirement (please define your proposed modified requirement)
- No
- Do not know

Anglian Water does not think there should be exemptions, however, we would like to see flexibility in the way it is delivered, e.g., the ability to contribute to Local Nature Recover Strategies.

Question 18

Do you agree that the above approach is appropriate for setting out the biodiversity net gain requirement for NSIPs?

- Yes (please explain why)
- No (please explain why not)
- Other (please tell us more)
- Do not know

Anglian Water agrees with the principle of having a standard approach, which also provides for flexibility for specific projects and improves the overall biodiversity network.

Question 19

Do you consider that the November 2025 is an appropriate date from which NSIPs accepted for examination will be subject to the biodiversity net gain requirement?

- Yes (please, provide any supporting evidence or justification)
- No, it should be later (please provide any supporting evidence or justification)
- No, it should be sooner (please provide any supporting evidence or justification)
- Do not know

Anglian Water considers that this date is appropriate for BNG to apply to the acceptance of new applications as this should enable BNG to be considered from the outset of the scheme design. However, it should not apply to any schemes previously granted consent and to which amends are proposed as this requirement would significantly impact the scheme.

Question 20

Do you agree that a project's acceptance for examination is a suitable threshold upon which to set transition arrangements?

- Yes (please explain why)
- No (please explain why not)
- Do not know

Anglian Water agrees with this approach.

Question 21

Would you be supportive of an approach which facilitates delivery of biodiversity net gain using existing landholdings by requiring a lighter-touch registration process, whilst maintaining transparency?

- Yes (please explain why)
- No (please explain why not)
- Do not know

Anglian Water agrees with this, but has some concerns around whether this would mean developing individual approaches and systems and therefore it could be simpler to have the same approach across the board. A lighter touch approach would still need to be measured, evidenced and monitored.

We can see that there is a benefit from all this data being visible in a single place, e.g., to facilitate better outcomes for biodiversity through collaboration and monitoring progress against nature recovery networks.

Question 22

Do you consider that this broad 'biodiversity gain plan' approach would work in relation to NSIPs?

- Yes
- No (please explain why not)
- Do not know

Anglian Water agrees with the principle of having a standard approach, which provides for flexibility and improvement in the overall biodiversity networks. Flexibility is more likely to be required for NSIPs.

Question 23

Should there be a distinction made for NSIPs between on-site habitats (which are subject to the biodiversity net gain percentage) and those habitats within the development boundary which are included solely for environmental mitigation (which could be treated as off-site enhancement areas without their own gain objective)?

- Yes (please explain why)
- No (please explain why not)
- Do not know

Anglian Water agrees with this approach. It is for the project to identify the biodiversity net gain areas and those separate areas required for other environmental mitigation. Provided the project delivers biodiversity net gain, additional biodiversity mitigation should be separate to the project's overall environmental gains.

Question 24

Is there any NSIP-specific information that the Examining Authority, or the relevant Secretary of State, would need to see in a biodiversity gain plan to determine the adequacy of an applicant's plans to deliver net gain (beyond that sought in the draft biodiversity gain plan template at Annex B)?

- Yes (please state what information)
- No
- Do not know

Question 25

Do you think that 30 years is an appropriate minimum duration for securing off-site biodiversity gains allocated to NSIPs?

- Yes
- Yes, but it should be reviewed after practice and biodiversity gain markets are evaluated
- No, it should be longer
- No, it should be shorter
- Do not know

Anglian Water agrees that 30 years is an appropriate minimum duration for NSIPs and believe that NSIPs should be treated the same as all other sites.

Question 26

Are further powers or other measures needed to enable, or manage the impacts of, compulsory acquisition for net gain?

- Yes, to enable compulsory acquisition (please explain what is needed)
- Yes, to manage impacts of compulsory acquisition (please explain what is needed)
- Yes, both (please explain what is needed)
- No
- Do not know

Anglian Water believes that further powers and other measures are needed. It is important for the mechanism of compulsory acquisition to be available as an option in the toolkit. It would then be up to the individual or company whether they use them. The mechanism of compulsory acquisition is particularly relevant where assets need to be enhanced because of growth.

Question 27

Is any guidance or other support required to ensure that schemes which straddle onshore and offshore regimes are able to deliver biodiversity net gain effectively?

- Yes (please explain what is needed)
- No
- Do not know

Anglian Water supports any additional guidance available for offshore regimes, particularly at the interface between onshore and offshore projects, for example the landing points and grid connections for offshore wind and coastal desalination. These types of schemes are particularly difficult, therefore additional support and information would be appreciated. It would be useful to see examples of best practice and what flexibility could be offered in these challenging contexts.

Part 3: How the mandatory biodiversity net gain requirement will work for Town and Country Planning Act 1990 development

Question 28

a) Do you agree with the proposed content of the biodiversity gain information and biodiversity gain plan? [Yes / No (please explain why not) / Other (please tell us more) Do not know]

A template is useful because it standardises the process and will save time in the long term. However, Anglian Water would like the flexibility to use this table inside and alongside other documents with additional information.

There could also be a need for a simplified process, and shorter form, for smaller projects, potentially with fewer parts being mandatory.

b) Do you agree with the proposed procedure for the submission and approval of biodiversity gain information and the biodiversity gain plan? [Yes / No (please explain why not) / Other (please tell us more) Do not know]

Anglian Water agrees with this procedure and would wish to ensure that all local authorities have the same validation requirements in terms of format and information. Standardisation is key for us as a business which works across many local authority areas and with both district and county councils.

Question 29

We will continue to work with external stakeholders and industry on the form and content of the template. Do you agree with the proposed information to be included in a biodiversity gain plan as shown in the draft template? [Yes / No (If not, is there anything in particular that ought to be removed, added, or changed to make the biodiversity gain plan fit for purpose?) / **Other (please tell us more)** / Do not know]

A template is useful because it standardises the process and will save time in the long term. However, Anglian Water would like the flexibility to use this table inside and alongside other documents with additional information.

There could also be a need for a simplified process, and shorter form, for smaller projects, potentially with fewer parts being mandatory.

Question 30

Do you agree that further guidance is needed to support decision-making about what constitutes appropriate off-site biodiversity gains for a given development? [**Yes** (please state what in particular would help most) / No / Do not know]

Anglian Water would appreciate comprehensive and standardised guidance on what constitutes appropriate off-site biodiversity gains. This will also ensure standardisation across local authorities.

Where Anglian Water is unable to deliver the required on-site gains, we will be looking to our other land holdings to identify suitable compensatory habitat before looking to third party/market delivery. We feel this approach provides better control of long-term management and monitoring.

Question 31

How should the UK Government encourage or enable developers and landowners to secure biodiversity gain sites for longer than the minimum 30-year period?

Consideration is required for the tax regimes in place on agricultural land that currently act as a barrier to landowners creating net gain sites.

Water companies fund the biodiversity management of their land assets through customer bills in line with AMP investment cycles. This mechanism is how land would be secured and managed for gain sites that are delivered on water company land for a 30-year period and beyond.

Question 32

Do you agree with our proposals for who can supply biodiversity units and the circumstances in which they may do so? [Yes / No (please explain why not) / **Other (please tell us more)** / Do not know]

Anglian Water would like to see robust oversight and regulation from the government around who can sell biodiversity units and how risks are managed. For example, what happens if the landowner of the units sells the land, or a company goes bust.

However, this process must be streamlined so that it doesn't hold up new developments. As we have mentioned, we are the statutory undertaker for water supply and wastewater which is critical infrastructure, so we ask that the BNG process doesn't put our operational requirements at risk.

Further guidance on how the market will work would be useful, including how pricing units would work and what lessons were learnt from the carbon markets.

Question 33

Do you agree that developers which are able to exceed the biodiversity gain objective for a given development should be allowed to use or sell the excess biodiversity units as off-site gains for another development, provided there is genuine additionality? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

Question 34

Do you agree with the proposed scope of the UK Government's role in facilitating the market, as set out above? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

Anglian Water agree with the list, but we would also like to see the government's role to include being an independent mediator for an appeals process if there is a disagreement with the developer and the local authority.

Question 35

Are the proposals outlined here sufficient to enable and encourage habitat banking? [Yes / No (please specify what else could be done and why it is needed) / Do not know]

Yes, Anglian Water intends to establish a habitat bank as a business for our internal use as soon as possible. We may consider habitat banking as part of entering a market in the future once BNG is bedded in.

Question 36

Do you agree with our proposal that to be eligible to supply biodiversity units for mandatory biodiversity net gain, habitat must be created or enhanced on or after a specified date, proposed to be 30 January 2020? [Yes / Yes, but not this specific date (please suggest an alternative date and explain your choice) / No (please explain why not) / Do not know]

Anglian Water established a strategic biodiversity baseline using the Defra Metric 2.0 in 2019. This was completed using remote sensing techniques rather than on the ground surveys and is confirmed on site when ecologists survey a site for a specific project.

If an organisation can demonstrate the establishment of a robust baseline prior to this date then some flexibility could be applied, otherwise it should default to the proposed 30th January 2020.

Question 37

Should there be a time limit on how long biodiversity units can be banked before they are allocated to a development? What would you consider to be an appropriate time limit? [Yes (please specify what this limit should be) / No / Do not know]

The biodiversity gain site register

Question 38

Do you agree that the eligibility criteria for adding sites to the biodiversity gain site register are sufficient? [Yes / No (please explain which additional criteria should be included or which existing criteria should be excluded, and your reasons for this) / Do not know]

Anglian Water may use a combination of its own sites to meet the need for offsite gain requirements, so we believe that the register should allow for capturing details of combinations of onsite and offsite gains.

Companies, like Anglian Water, that are landowners and developers will want to compensate for losses on their own land. We would welcome further guidance on how, in this case, we would be able to demonstrate that a site was legally secured as we would not set-up a conservation covenant with ourselves.

Question 39

Do you agree that the register operator should determine an application within a maximum of 28 days unless otherwise agreed between both parties? [Yes / No (please explain why not) / Do not know]

Question 40

Do you agree that this list of information requirements will be sufficient to demonstrate that a biodiversity gain site is legitimate and meets the eligibility criteria? [Yes / No (please explain which additional information should be included or which existing information should be excluded, and your reasons for this) / Other (please tell us more) / Do not know]

We would like to see additional guidance provided on the definitions of 'fit and proper' and 'suitably managed'.

We believe the register should include the relationships between different developments and compensation sites. For example, one site may provide offsets for multiple other projects, or one site may be part of an offset for a single project.

Question 41

Do you agree that the UK Government should require a habitat management plan, or outline plan, for habitat enhancement to be included on the register? [Yes / No / Other (please tell us more) / Do not know]

Question 42

Do you agree that the UK Government should allow the register operator to:

a) set a fee for registration in line with the principle of cost recovery? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

Anglian Water agrees with setting a fee for registration. The Environment Act mandatory requirement for BNG comes into effect mid-AMP (investment cycle) for the water sector, so BNG is not funded as part of our current AMP (2020-2025).

We would also want to understand what the likely cost would be as it should not be disproportionately expensive.

b) impose financial penalties for provision of false or misleading information? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

We agree with the principle of a penalty for misleading information, but we would need to know how much the penalty would be to be able to comment further.

Question 43

Do you agree with our proposal to allow applicants to appeal a decision by the register operator where the applicant believes that the registration criteria have not been appropriately applied? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

Question 44

Do you agree with our proposals for additionality with respect to:

a) measures delivered within development sites? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

b) protected species and off-site impacts to protected sites? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

c) on-site impacts on protected sites, and any associated mitigation and compensation? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

d) achievement of River Basin Management Plan Objectives? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

e) the strengthened NERC Act duty on public authorities? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

Question 45

Do you think that

A) the non-designated features or areas of statutory protected sites and/or

B) local wildlife sites and local nature reserves, should be eligible for enhancement through biodiversity net gain? [Yes, both A and B should be eligible / No, only A (non-designated features or areas of statutory protected sites) should be eligible / No, only B (local wildlife sites and local nature reserves) should be eligible / No, neither should be eligible / Other (please tell us more) / Do not know]

Question 46

Do you agree that the enhancement of habitats, including designated features, within statutory protected sites should be allowed in the coastal, intertidal and marine environment as defined above? [Yes / Yes, in some circumstances (please specify which circumstances) / Yes, but within a different range of the high water mark (please specify) / No (please explain why not) / Other (please tell us more) / Do not know]

Question 47

Do you agree with our proposed approach to combining payments for biodiversity units with other payments for environmental services from the same parcel of land? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

Question 48

Are these proposals for statutory biodiversity credits sufficient to:

a) Ensure, when supported by suitable guidance, that they are only used by developers as a last resort? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

b) Mitigate the market risk associated with the sale of statutory biodiversity credits by the UK Government? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

Question 49

Do you think there are any alternatives to our preferred approach to credit sales, such as those outlined above, which could be more effective at supporting the market while also providing a last resort option for developers? [Yes (please explain the alternatives and your reasoning) / No (please explain why not) / Other (please tell us more) / Do not know]

Question 50

Do the principles for how we will set, and review credit price cover the relevant considerations? [Yes / No (if not, what further considerations should be included?) / Other (please tell us more) / Do not know]

Anglian Water think that the credit price should be lower to begin with, but as more options become available, the price should increase proportionately, therefore encouraging the market to flourish independently.

Question 51

Do you agree with the proposed principles for credit investment? [Yes / No (please explain why not) / Other (please tell us more) / Do not know]

Question 52

Do the above project-level management, monitoring, enforcement, and reporting proposals seem sufficient, achievable, and not overly burdensome on practitioners, developers, or planning authorities? [Yes / No, not sufficient / No, overly burdensome or not achievable / No (please explain why not and suggest how could they be improved) / Do not know]

Question 53

Do you think earned recognition has potential to help focus enforcement and scrutiny of biodiversity net gain assessments, reporting and monitoring? [Yes (please explain why this would help) / No (please explain why this would not help) / Do not know]

Yes, this would streamline schemes, time and resources.

Question 54

Do the above proposals for policy-level reporting, evaluation and enforcement seem sufficient and achievable? [Yes / Yes, but not sufficient / Yes, but not achievable / No (if not, how could they be improved?) / Do not know]

Anglian Water is a statutory authority that will be subject to the strengthened NERC Act 2006 Biodiversity Duty. Therefore, we would welcome additional guidance as to whether we would be subject to the same data requirements on BNG as set out for the planning authorities. If so, we

currently do not have the data collection or management and reporting platforms that would be required to provide all of this data.

Question 55

Considering the data requirements set out above and in greater detail in Annex C:

a) is there any additional data that you think should be included in the Biodiversity Reports? [Yes (please describe the data and explain the reasons for your view) / No / Do not know]

Anglian Water currently has a business plan (2020-2025) performance measure for BNG and this is likely to evolve or change with each investment cycle. There might be corporate or regulatory commitments/targets that should be included but reported separately for overall context.

b) is there any data included here that should not be required as part of the Biodiversity Reports? [Yes (please describe the data and explain the reasons for your view) / No / Do not know]