



PUPILS 2 PARLIAMENT

Protecting Nature when Building New Buildings

Text of form submission to the Department for Environment, Food and Rural Affairs,

for their consultation on

Improving the implementation of Biodiversity Net Gain for minor, medium and brownfield development

Introduction

Pupils 2 Parliament is a project submitting the views and perspectives of school pupils to government consultations and parliamentary inquiries.

We independently consulted five focus groups of pupils aged 9 to 17, in four primary schools and one high school. In total, 184 pupils gave their views on questions in the consultation document.

Reviewing the exemptions to the requirement for biodiversity net gain (BNG) on building sites

Overall, pupils voted in favour of continuation of the following exemptions:

householder applications for small projects such as home extensions and conservatories

Biodiversity gain sites, including developments with the primary purpose of supporting biodiversity and the environment.

In relation to small householder applications, eg for extensions, there was a concern that even small local impacts on biodiversity may be minor on

site, but can have a knock-on 'chain' effect on wider distribution of species.

Overall, they voted AGAINST continuation of the exemptions for the following currently exempted developments:

Developments below the de minimis threshold (eg of 5m x 5m)

Self build and custom built applications

High Speed Rail network.

In relation to self build applications, the majority saw it as unnecessary to exempt these from the BNG requirement, although it was recognised that self-builders are likely in any case to be more environmentally conscious than commercial builders.

In relation to the High Speed Railway, pupils recognised that train travel is environmentally preferable to other forms of long distance travel, but they also pointed to the high environmental damage of running a railway through the countryside, and of the pollution regularly produced along the track by trains themselves. They saw compensatory improvements to biodiversity as both logical and an essential part of railway development.

However, the pupils' position was more complex than that. On a vote, proposed by pupils themselves in one group, the children voted by 23 to 8 that a 10% biodiversity tax should be imposed, but that it could be spent on higher priorities (such as the NHS) than solely on making High Speed Rail more environmentally friendly.

The majority of pupils voting (59%) voted against continuation of an exemption for self build developments, but on a separate vote, 57% voted against this exemption being replaced by exemption for a single dwelling house. They did not wish to see an exemption for either single house developments, or for self building.

Their main reasoning was that even single house developments can and should make a contribution to nature and biodiversity - whether through a planted garden, a tree or two, roof planting, or growing a plant up a wall. Some proposed that government money could help fund this.

There was also a proposal that there should be a legal requirement on householders to keep a garden area planted in some way rather than concreted or built over.

There was a view that there should be a set proportion of a house site that must be reserved "for nature" - including a planted garden - such as a quarter of the site area (leaving three quarters of the site for the house and any other buildings).

There was also a view that there could be a standardised requirement that two trees must be planted for each house built - provided that the trees are suitable for the size of the site.

Alongside the question of whether or not there should be a new single house BNG exemption, pupils proposed that there should be a priority and incentive for environmentally poor land to be selected over good habitats for building, quite separately from any percentage BNG improvement requirement.

They also proposed that a planning priority should be given to renovation of existing housing and buildings over new building, to avoid increased negative impact on biodiversity.

One exemption proposed from the BNG requirement for a single house site was where the house size is necessarily large because of the needs of a disabled resident or family member.

Pupils had voted both against retention of the current self-build exemption, and against its replacement with a single house exemption. They did not want either exemption.

In discussion, pupils were clear that should the Government proceed with a single house exemption, they would wish to see the threshold set sufficiently low to avoid the negative biodiversity impact of building unduly large houses, or houses with very large grounds.

The 'de minimis' exemption from the biodiversity gain requirement for very small sites

54% of the pupils who voted on the de minimis exemption wished it to be removed. Their main reason for this was that all development has the potential for impact on biodiversity, both positive and negative, and that even a very small site should make a contribution to biodiversity, albeit small.

They wished to see all small opportunities to be taken to enhance biodiversity, and gave examples of adding bird boxes and feeders to even small building projects, using hedging even for small length boundaries, and perhaps adding planting up a wall of a small building.

Of the minority who wished the de minimis exemption to remain, however, most wished the de minimis threshold either to stay the same as it is now, or to be expanded only slightly to 50 square metres.

Basing biodiversity requirements on site ground area

Pupils were concerned that the BNG policies are based on ground level area, and wished to register their wish to see greater use made of high rise building in place of one or two storey housing, including multiple storey building with local facilities at ground level and housing above.

They also proposed that greater consideration be given to unusual developments to save impact on habitat ground, such as underground building, high rise building with open nature spaces beneath, use of mobile housing, and housing on boats or waterborne developments.

Biodiversity requirements on larger developments

For larger development planning, pupils wished to see more focus on compact site development, for the sake of biodiversity, such as closely spaced housing, cul-de-sac developments, and small tight village hub sites, all to reduce ground footprint and so impact on natural habitats. One proposed the building of mid-sized vertical housing, with upper storeys of wider floor space than the ground footprint of the lowest floor [on the concept of a mediaeval town street].

Proposed removal of biodiversity gain requirements from minor developments

The view from our 184 pupils was fully equivocal on this question - not actually 'don't know', but actively voting in equal numbers FOR and AGAINST the proposal to remove the BNG requirement from minor developments. (eg of up to 9 houses).

The children had taken the clear view that very small sites and single house sites should not be exempted from a requirement to improve

biodiversity, on the grounds that all will affect biodiversity and that it is fair to expect that impact to be a net positive rather than negative, with proportionately small and easy contributions 'to nature' from very small sites.

However, mindful of the national need for significant house building, pupils were relatively more in favour of BNG exemption for minor sites for multiple houses. They saw this as more likely to encourage significant house building than would exemptions for very small sites or single house developments.

Even for minor development sites, pupils were clear that "all houses should do something for nature and not destroy it", and that the BNG rules should apply to help prevent significant damage to nature, such as cutting down trees unnecessarily.

On all such sites, the pupils were clear that builders should preserve nature benefits already existing, and "build with nature" such as incorporating existing trees or water areas into the building plan. One pupil, from a family of builders, cited examples of how their family aimed to build around and incorporate nature into their site designs.

Other biodiversity issues

In discussions, while pupils were mainly concerned with house building, they also acknowledged the necessity for inclusion of relevant infrastructure such as schools, shops and workplaces.

There was also a proposal for a discount, if not a full exemption, from BNG requirements for sites which are adjacent to, but do not damage, very high value habitat spaces (including adjacent houses with high biodiversity value).

The proposed exemption from biodiversity gain requirements for improvement of parks, public gardens and playing fields

75% of the pupils voting on this question voted FOR an exemption to the BNG requirement for developments on parks, public gardens and playing fields, PROVIDED that these are being carried out to enhance the public function of those facilities - such as providing car parking, toilets, changing rooms, sports or activity pitches, or play equipment.

Many pupils took into consideration the likelihood that buildings in parks, public gardens and playing fields would be likely to be built on grassland rather than higher biodiversity value land. Although there was a caution about too extensive building over grassland - building there is acceptable, "as long as not too much grass is destroyed".

Provision of biodiversity gains through 'offsetting' improvements away from the development site

When 69% of pupils voted in favour of continuing a BNG exemption for developments that are by their nature to enhance biodiversity, their discussion was clear that they had in mind not primarily 'offsetting' sites, but rather the full range of environmental improvement projects.

Exemption of temporary buildings from biodiversity gain requirements

63% of the pupils voted in favour of temporary building development being granted exemption from BNG requirements, provided that the building was in place for no more than five years, and that a planning requirement is indeed automatically and effectively in place to leave the site with no remaining negative impact on biodiversity afterwards.

The pupil vote on proposed exemption from BNG requirements for temporary buildings was inclusive of the proposed 5 year time limit.

Measuring and estimating biodiversity gain in planning

56% of pupils voted in favour of the use of a 'low impact' metric for medium developments as well as small sites. They supported the principle that it should be the absence of important habitats or rare species, rather than the size of the site, that determines whether the current small scale metric (SSM) should apply.

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In discussion, pupils raised the importance of a routine check on 'low impact' sites that are not already protected or subject to special designations, before designating them as such, to assess the likelihood of the presence of important habitats.

Pupils proposed that a camera-linked AI app should be developed to give an automated screening assessment of the probability of rare or important habitats or species being present.

Pupils also put forward a proposal that site location, as well as what is within the site, should be taken into account in the assessment. They were concerned that large scale new town development naturally pushes nature outwards from the development itself, and that habitats around the development are likely to become more critical to wildlife. They therefore proposed that increased attention should be paid to the assessment of, and BNG requirements for, sites on the outskirts or suburbs of towns, cities and new town or large developments.

One group also proposed, and voted by a strong majority in favour of, introducing a sliding scale of percentage BNG improvement required, with an increasing percentage being required for larger buildings and sites.

There was also a proposal from some of our groups that the assessment process should give biodiversity credit for the presence or provision of greenhouses, being likely to enhance plant growth and biodiversity locally, and especially in gardens.

Some pupils wished to see credit given in BNG assessments to the environmental friendliness of the structure and materials of proposed buildings or renovations.

Finally, pupils were concerned about three factors related to the validity of site assessments for BNG. Firstly, that assessment of preservation of biodiversity features should take into account the long term suitability and safety of those features (such as large and possibly old or larger growing trees) continuing to be near housing. Secondly, the likelihood of damage to biodiversity features present on a site during the construction process should be taken into account. And thirdly, the probability that what is proposed for a site's future biodiversity may well not be what is actually delivered in practice.

Biodiversity assessment by competent persons or ecologists, and use of assessment technology

One pupil proposed the use of multiple visits by different members of a team of non-ecologist 'competent persons', with their findings and scores pooled and averaged - based on research that the 'wisdom of the crowd' making independent assessments tends to be more accurate than that of a single assessor or a team of assessors collaborating.

Pupils were very clear in discussion that the key principle should be use of the SSM for low environmental impact sites, regardless of size.

They proposed that a two stage process should be developed for use by non-ecologists, based on AI assisted video survey to identify likelihood of rare or precious species or habitats across a site, followed by an app-assisted and renamed SSM / 'low impact' process where that AI assessed likelihood is low.

Some were sceptical about the reliability and validity of AI assessment, particularly at first, and stressed the importance of ecologists being involved in the AI training and initial validation of the process. But many saw AI as likely to increase in reliability and validity in time, to become a valuable habitat-assessment tool.

In their discussions, pupils clearly supported the concept of developing a camera-based app, with plenty of assessment guidance built in, as a metric tool capable of use in habitat assessment by any competent, rather than expert, person. Such an assessment app could incorporate the ability to perform comprehensive plant species recognition. On a vote, 88% of pupils were in favour of this proposal.

The contribution of gardens to biodiversity net gain

Particularly on small or single dwelling sites, pupils wished to see biodiverse features being incorporated into the building and garden.

Pupils saw vegetated gardens as a key contribution to biodiversity, and wished to see all new housing having allocated garden space, requirements for permanent biodiversity features to be incorporated into even single house sites, incentives for people to plant garden areas, and even a legal requirement to vegetate a proportion of garden areas.

It follows that biodiverse features within vegetated gardens should be counted as part of a development.

Submitted by Dr Roger Morgan OBE
on behalf of Pupils 2 Parliament

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