

A Habitat Banking Vehicle for Leeds City Council

Date: 7th February 2024

Report of: Directors of City Development and Communities, Housing and
Environment

Report to: Executive Board

Will the decision be open for call in? Yes No

Does the report contain confidential or exempt information? Yes No

Brief summary

This report is about responding to new approaches to protecting and enhancing biodiversity in Leeds that have been brought about by the Environment Act 2021, including setting up a Habitat Banking Vehicle for the Council, which would enable direct investment in strategic nature recovery.

The Environment Act requires development to provide a minimum 10% net gain in biodiversity and where this is not feasible on-site, there is a provision for making off-site delivery through the purchase of "biodiversity units", which would then be implemented elsewhere by a third party, who is registered as a formal Habitat Bank. There are several private Habitat Banks in operation who will direct off-site improvements to private land.

The Act provides an opportunity for the Council to become directly involved in improving the biodiversity of the District on its own land, and potentially the land of other partners. This is proposed to be undertaken via a Habitat Banking Vehicle (HBV) which would operate as an arms length limited company, have responsibility for the sale of biodiversity units (delegated to the Council) and be administered by Directors of the Council. It is envisaged the HBV would contract with the Council, i.e. Planning Services, Climate, Energy and Green Spaces and other parts of the Council, who would implement nature recovery on its behalf.

This report sets out the reasoning behind the requirement for a Habitat Bank and seeks Executive Board approval for the Directors of City Development and Communities, Housing and Environment to undertake the next steps to set up and administer the Habitat Banking Vehicle.

Recommendations

- a) Executive Board is asked to approve the principle of establishing a Special Purpose Vehicle (a Habitat Banking Vehicle (HBV)) so that the sale of habitat units can be undertaken by the HBV in line with the Environment Act 2021.

- b) Executive Board is asked to delegate authority to the Director of City Development and Director of Communities, Housing and Environment regarding setting up and operating the HBV, in consultation with the City Solicitor, Section 151 officer and the Executive Members for Sustainable Development & Infrastructure and Climate, Energy, Environment and Green Space.
- c) Executive Board is asked to note that an annual report will be provided to them detailing the performance of the HBV for the previous financial year and future plans for the next financial year.

What is this report about?

- 1 The Environment Act 2021 aims to halt and reverse decline in UK biodiversity through several measures including:
 - i. **Biodiversity Net Gain (BNG)** – a mandatory obligation on most new development, to be secured through the Local Planning Authority. BNG will be delivered either on the development site, or off-site on “biodiversity gain sites” (or “gain sites”).
 - ii. **“Biodiversity Duty”** for Local Authorities - to consider what they can do to conserve and enhance biodiversity, agree policies and objectives for this and implement them. The Duty requires a first consideration of what action to take for biodiversity by 1 January 2024 with policies and objectives as soon as possible after this.
 - iii. **Local Nature Recovery Strategies (LNRS)** – mandatory, locally led strategies for nature and environmental improvement, for which the responsible authority is WYCA. The Council is currently engaged in supporting the development of the LNRS from both an ecology and a planning perspective; with opportunities for wider public consultation as the strategy progresses.
 - iv. **Environmental Improvement Plans (EIP)** by DEFRA, which map out the action being, or to be, taken to meet certain environmental goals (including by local authorities) and will be regularly updated.
- 2 The aim of Biodiversity Net Gain (BNG) is to make developers provide an increase in natural habitat and ecological features over and above that affected by a development i.e. to leave nature in a better state than they found it, by a value of 10% or more. In fulfilling this mandatory obligation developers will have to quantify their anticipated impact on habitats as part of their planning application, and produce a long-term plan that can deliver, monitor and maintain an area of habitat that will offset biodiversity. In so doing they may need to deliver net gains off-site and can rely on other landowners with land in need of nature recovery to direct their units to.
- 3 Leeds gets a lot of its distinctive character and identity from its natural environment: two-thirds of the Leeds District is countryside (with the Southern Magnesian Limestone Natural Area to the east and the Pennine fringes to the west and north forming particularly important habitats). The environment also extends into the main urban area in green wedges (such as the Meanwood Valley and the Wykebeck Valley) and the two main rivers and canals form significant blue and green corridors (such as the Lower Aire Valley) which are very important for wildlife. In terms of biodiversity intactness, the UK performed the worst amongst the G7 countries, third from bottom in Europe. Therefore, whilst Leeds benefits from significant areas of natural environment it is not particularly healthy or resilient. Pressures from farming practices and

development can lead to a loss of biodiversity and climate change will also affect the ability of plants and animals to thrive.

- 4 The Environment Act 2021 places a “Biodiversity Duty” on Local Authorities - to consider what they can do to conserve and enhance biodiversity, agree policies and objectives for this and implement them. The Council recognised Biodiversity in its Best City Ambition Net Zero pillar, which sets a focus for “joining with local communities, landowners and partners to protect nature and enhance habitats for wildlife”. Biodiversity is also reflected as part of the Council’s decision making and procurement practice in a climate emergency, with objectives to “protect, enhance and increase biodiversity”.
- 5 The statutory requirements of implementing the 10% uplift in BNG will be undertaken by the Local Planning Authority (LPA) and will have a significant impact on the determination of planning applications. Proposers of development will have to consider biodiversity from the outset of their schemes and engage in additional technical work on biodiversity and this, as well as the purchase of Units, will come at an additional cost, which should be treated as a standard development cost and not a viability pressure. The LPA will need to prepare additional guidance and advice for developers on assessing the BNG evidence in support of planning applications and reporting and monitoring of BNG. More detailed technical appraisal of planning applications will be needed at each of the end-to-end planning application stages (from pre-application, to validation, determination, and discharge of conditions). Whilst it will be the developer (or habitat bank provider) responsibility to ensure the implementation of biodiversity the LPA will also need to monitor and enforce the conditions, obligations and covenants that are linked to planning permissions.
- 6 Mindful of the changes brought about by the Environment Act, the Council’s emerging Local Plan Update “Your City, Your Neighbourhood, Your Planet” (LPU1) seeks to update and improve the Council’s planning policies for biodiversity. This is done within a wider approach to improving Green and Blue Infrastructure and the way that nature can be protected and enhanced for multiple benefits, including climate change, across the district with a focus on biodiversity, greenspaces, trees, local food production and water use and storage.
- 7 The secondary legislation, regulations and guidance surrounding the Environment Act 2021 has now been published and the mandatory approach to BNG is due to start in February 2024 for ‘major’ applications and April 2024 for other application types. DEFRA expects Local Authorities to sell biodiversity units, which would be used to help nature recovery by implementing new habitat gains on “biodiversity gain sites”, on Council owned land. As a large authority with significant land assets and ambitious environmental aims this offers a significant opportunity for the Council to offer land to create new habitats. The use of biodiversity net gain monies would help deliver additionality to nature recovery; reducing the financial burden on service areas who are currently delivering environmental improvements on council land within a significantly reduced budget setting (such as within our green spaces).
- 8 However, the Environment Act 2021 is not clear on the set up for this and it has only been through the publication of additional guidance in November 2023 that appropriate routes for the Council have been clarified. Off-site gains, as well as significant on-site gains, must be subject to an enforceable agreement to give confidence that they will be delivered and then retained for a minimum of 30 years. Without such an agreement in place, promises of future gains in

biodiversity, upon which development will be allowed to go ahead, may not materialise. Therefore, all habitat bank sites are required by law to be registered on a National Register (as per section 100 of the Environment Act 2021) operated by Natural England. To be registered the gain site must be subject to an enforceable legal agreement i.e. either a s106 obligation (under Town & Country Planning legislation) or a Conservation Covenant (a form of legal agreement for provision of heritage or environmental enhancements). Both options present difficulties for the Council because it is not possible for the local authority to have a legally enforceable agreement with itself.

- 9 It is proposed that Leeds City Council establish a Habitat Bank Vehicle (HBV) - within the framework set by the Environment Act 2021. This will enable a legally enforceable agreement between the Council and the HBV. The HBV is a discretionary activity for the Council and will enable the Council to secure the implementation of nature recovery on its own land or that of partner bodies via the sale of biodiversity units to developers who need to deliver off-site net gain. The HBV as a separate legal entity to the Council will channel developer funding into biodiversity schemes and projects and contract with the Council on a full cost recovery basis to support implementation.
- 10 The Council has been operating an interim approach to selling units – allowed under the transitional provisions of the Environment Act – which has provided valuable learning. These interim arrangements will no longer be available as an option to the Council after the mandatory system is due to start in February 2024. However, this interim approach has so far generated £2.59m worth of biodiversity units from 16 schemes. This income has been, or is intended to be, spent on specific habitat biodiversity enhancements on Council land across the authorities green spaces and existing nature conservation areas.
- 11 Whilst generally positive overall, the Environment Act does open up a free market for biodiversity units, which the Council will not be able to directly control. An HBV for Leeds would enable the Council to operate within this free market, thus enabling greater matching of nature recovery with local priorities and wider associated benefits that will not necessarily be enforceable within a private market where off-site benefits could be delivered outside the District and may not as readily link to wider local nature benefits.

What impact will this proposal have?

- 12 Establishing a Habitat Banking Vehicle (HBV) is the most appropriate route for the City Council to engage directly in the market for biodiversity units within Leeds. The City Council own around 4,000 ha of green spaces, which includes 16 Local Nature Reserves and 50 Local Wildlife Sites with a wide distribution across all parts of the District. Elsewhere the City Council is in partnership with bodies such as the RSPB to manage significant nature sites such as the 400ha St Aidan's wetland. An underlying focus here is to optimise the biodiversity benefits for Leeds with the Council having a direct influence over what recovery happens and where it is focussed.
- 13 An HBV would ensure that the Council's land holdings were opportunities where off-site net gain could be directed and help:
 - i. retain off-site biodiversity benefits within the District rather than risk these being spent on a national register or delivered where private habitat banks have their land holdings (which may be some distance from Leeds)

- ii. directly deliver local priorities for nature conservation and nature recovery as part of the Council's Net Zero Strategy and the new biodiversity duty
- iii. harness the benefits that nature recovery can bring to complementary Council projects and programmes around health and well-being, improving local environments and neighbourhoods, flood risk management, active travel, play sufficiency, city spaces, recreation strategies and landscape
- iv. deliver the as yet unpublished Local Nature Recovery Strategy, which will set sub-regional priorities for habitats and species alongside locally specific proposals, such as improving access to urban nature
- v. enable the Council to engage more constructively with key partners such as local wildlife trusts, rivers and canals trusts, charities and statutory bodies on priority nature recovery projects, which may involve use of their land

Nature of the HBV

- 14 The HBV would be similar to special purpose vehicle models previously used e.g. for the Pipes District Heating network. The HBV would:
- i. be an ordinary limited company
 - ii. be scaled to be as big as required and have a simple structure and governance arrangements
 - iii. be the signatory on relevant legal agreements with developers for the delivery of off-site net gains enabling Council land to be used for this purpose
 - iv. be the leaseholder on biodiversity gain parcels of land for the period of implementation and monitoring i.e. the Council would lease relevant parcels of land, which are the focus of biodiversity improvements to the HBV
 - v. register parcels of land that it is leasing from the Council on the national register
 - vi. contract out the implementation and long-term maintenance of new habitat to relevant Council services
 - vii. contract out the administration of the HBV to the Council, including the Directors of City Development and Communities, Housing and Environment being Directors of the Limited Company
 - viii. be not for profit and any surplus generated would be re-directed back into the HBV to ensure continued provision of biodiversity priorities through the Council
- 15 Further legal advice is being sought to ascertain the precise nature of the HBV. It is noted that Plymouth City Council have recently set up an HBV and the Council are considering this as a model. To assist in moving this forward the next step would be to set up a Stakeholder Group (or Biodiversity Board) comprised of relevant officers from City Development, Communities, Housing and Resources, Legal Services and Finance. The exact nature of the Board and its relationship with the HBV is to be determined. It is envisaged that the initial work of the Board would be to consider and establish the required mechanism and to build the business case for

the HBV. Following on from this it is anticipated that the work of the Board would be to give oversight of the delivery of biodiversity in line with the HBVs terms of reference, financial reporting arrangements and setting of future priorities. External legal advice on the process of setting up an HBV is being sought.

- 16 Mandatory BNG is due to start from February 2024 for Major planning applications and April 2024 for other types of applications. Subject to Executive Board's approval the HBV will be prioritised to start as soon as practicable subject to putting in place the required legal framework. Subject to making the necessary legal arrangements, the HBV should be operational from March/April 2024. The presence of an HBV in the District which can deliver nature recovery on sites close to development activity will provide developers with the surety that their planning applications can be de-risked from a BNG delivery perspective. It is noted that the Council cannot insist that its HBV be used by developers. The HBV will operate within a competitive marketplace. This will include pricing biodiversity units accordingly and making available relevant sites so that a range of habitat types can be accommodated.

Future arrangements and operation of the HBV

- 17 The HBV will operate on the basis of matching relevant sites for habitat recovery with development opportunities that generate a need for off-site improvements within the District. This matchmaking will be driven by updated Local Plan policies, which seek to locate off-site benefits as close as practicable to development sites and will necessarily need to focus on a relatively small number of Council-owned sites in the initial phases of the HBV due to the need to undertake due diligence on the Council's land holdings before it is tied up in legal agreements for nature recovery for at least 30 years. Sitting alongside the HBV will be an approach to readying strategic Council-owned sites for the HBV which will include ecological assessment, identification of potential units, timescales, due diligence, and alignment with Council policy. It should be noted that discreet parcels of land will be identified for the purposes of BNG improvement and monitored accordingly.
- 18 The HBV will be offered as a route to delivery of off-site biodiversity at relevant stages of the planning application process e.g. through the Council's pre-application service. Although it is noted that both the Council's local plan policy and national guidance is for biodiversity net gain to be delivered on-site.
- 19 The Environment Act envisages that BNG will help assist in strategic nature recovery and be monitorable for a period of 30 years. The Council as local planning authority will (outside of the HBV) have responsibility for ensuring that this monitoring occurs and is appropriate. The strategic nature of BNG and the need to set up appropriate rigorous biodiversity assessment mechanisms for 30 year of improvement and monitoring suggest that small scale biodiversity improvements (e.g. planting wild flower areas or local bird boxes) will not be a feature of the HBV because monitoring such small scale benefits over a 30 year period would be too onerous and these are unlikely to match the types of biodiversity units arising from development sites.
- 20 It will be important to recognise the role of small-scale biodiversity projects through other means e.g. on-site improvements or through using other funding streams such as local infrastructure funding in association with neighbourhood plans, charities or grants.

How does this proposal impact the three pillars of the Best City Ambition?

Health and Wellbeing Inclusive Growth Zero Carbon

- 21 Habitat creation and enhancement is essential for all three pillars of the Best City Ambition. By creating natural areas close to where people live and work positive benefits on mental health and wellbeing are captured, and land value is seen to improve. By influencing how off-site BNG monies are spent within the district the Council will be able to address inequalities in the amount and location of natural areas, enhancing environments on a local and a regional scale which has positive impacts on growth. Habitats will also play a crucial role in meeting zero carbon, acting as carbon sinks that are protected from development for at least 30 years, help species to adapt to changing climate by creating greater connectivity between greenspaces and helping to mitigate against climate change impacts such as flooding and heat island effects.

What consultation and engagement has taken place?

Wards affected:

Have ward members been consulted? Yes No

- 22 Members of Development Plan Panel and Climate Emergency Advisory Committee have been kept up to date with proposals regarding the implementation of BNG with the most recent being a presentation to Development Plans Panel in June 2023 to update on progress and proposed next steps. Relevant Executive Members have been included in presentations and briefings.
- 23 Future consultation will be with the Executive Members for Sustainable Development & Infrastructure and Climate, Energy, Environment and Green Space and through an annual report to Executive Board on the performance and to agree the future priorities of the HBV.

What are the resource implications?

- 24 The HBV has the potential to bring significant new capital resource into the Council. Capital resource will be from the sale of biodiversity units to developers through the HBV and will be spent on specific projects which will be registered with Natural England and monitored over a period of 30 years by the Council.
- 25 The HBV won't introduce a new burden on existing Council budgets. It will be revenue neutral because its administration will be fully recovered by the sale of biodiversity units. To that end, the HBV will "pay" the Council for the work it does in delivering additional improvements so that, without cost to the Council, the biodiversity of the City is enhanced/improved, which at the same time meets and complements our existing strategic duties to improve biodiversity in the District.
- 26 The HBV would set the cost of a Biodiversity Unit. The cost of the Unit would be set to include:
- i. the cost of implementing the net gain on the biodiversity site over a 30-year period (circa 75% of each unit will be spent on this)

- ii. the costs to the HBV of identifying and carrying out due diligence on individual biodiversity sites, including ecological assessment (circa 15% of each unit will be spent on this)
 - iii. the costs of securing and maintaining an appropriate pool of potential biodiversity sites, including front loaded strategic ecological assessment, mapping and strategy work (circa 5% of each unit will be spent on this)
 - iv. the costs of administering the HBV, including new software, annual reports, overall management, financial transactions, meetings and legal costs (circa 5% of each unit will be spent on this)
- 27 On average Biodiversity Units are costed at between £25,000 to £40,000. The precise costs of the Leeds HBV units will be determined so as to ensure that the above costs are recoverable in full so that the HBV is at least cost neutral and not a cost to the Council. This will involve it procuring a number of services from the Council, including, legal, climate, energy and green spaces, planning (in a non-statutory role) and finance as well entering into a lease with the Council for land parcels.
- 28 It is noted that the Local Planning Authority in its statutory role will separately be responsible for BNG monitoring and reporting for which an administration charge per Section 106 agreement will be levied. This will operate outside of the HBV as part of the Council's statutory planning duties.
- 29 The Council, in its budget setting for 2024/25, has a new income target of £350k for the monitoring of biodiversity net gain within planning applications, recoverable from the sale of Biodiversity Units. This is based on assumptions, including the number of planning applications received by LCC, which will determine the total level of s106 income. This will need to be reviewed on an annual basis to ensure the assumed level of income is realistic and achievable.

What are the key risks and how are they being managed?

- 30 The HBV will contract out its roles to the Council and so resourcing within relevant departments is an issue. If sufficient resource is not provided and the HBV does not operate efficiently then developers will not use its services and it will not be able to sell units. This is proposed to be managed by securing additional staff within relevant services.
- 31 There is a risk that the suggested fees for biodiversity units won't be sufficient to deliver the required work because there hasn't been a full test of the costs of delivering BNG yet over a 30-year period. This will be managed by annually reviewing and benchmarking the costs of delivering a Unit as well as benchmarking against other Habitat Banks to ensure that it is competitive but reasonable.
- 32 There is a risk that administration of the HBV will be complex and time consuming. The Council are investigating new software packages both in terms of data storage for annual reporting and for spatial recording to ensure that the HBV and its parcels of land are closely monitored and accounted.
- 33 There is a risk that recruitment of suitably qualified ecological expertise may be difficult as BNG is a mandatory approach across the country. The number of specialist biodiversity jobs is

expected to increase rapidly, but without concurrent rise in trained graduates or specialists. This can be managed by focussing on retention and recruitment solutions and considering apprenticeship options to help provide relevant expertise in-house.

- 34 The formation of an HBV is at a formative stage of the Environment Act and its implementation therefore the Council will need to be agile and keep things under review as further guidance and lessons emerge including experience from elsewhere in the country.

What are the legal implications?

- 35 Securing BNG on the majority of development is due to become a mandatory obligation from February 2024 onwards. Planning Regulations and Guidance will oversee how this is captured and implemented in line with other relevant legislation. Council's have the option to participate in creating biodiversity gain sites via the Habitat Banking process but as indicated above there are certain legal implications that need to be overcome and an HBV is considered to be the most pragmatic solution.
- 36 Setting up an HBV will require legal input and there will need to be continued oversight and governance to ensure that the Council does not step outside its legal remit. The Council is in the process of commissioning external legal advice on this matter.
- 37 In order to set an HBV up the Council will need to put in place the following:
- i. Establish an (arm's length) limited Company;
 - ii. Articles of Association and Shareholder/Members Agreement for the HBV incorporating a Business Plan.
 - iii. Management Services Agreement for the HBV which will cover issues such as the supply of services to the HBV from the Council or third-party service provider.
 - iv. The registration of the HBV with Companies House
- 38 Once established the HBV would then be responsible for setting up:
- i. Lease documentation between landowner (the Council) and HBV (as lessee) on proposed sites.
 - ii. Land Management Agreements between the HBV and whoever will undertake the physical implementation of habitat works (which could be the relevant Council department or a third party).
 - iii. Contracts of Sale between HBV and developers who wish to purchase off-site biodiversity units – this will require discussions and negotiations with the development industry at early stages in development proposals to identify suitable units.
 - iv. Legal agreements between the HBV and LPA to secure the biodiversity enhancements agreed through the planning process. This Agreement then allows for the site to be registered as a gain site on the national register
 - v. Habitat Management and Monitoring Plans between HBV and LPA need to be agreed as part of the planning permission process and either confirmed through s106 wording or left to the details of the CC wording.

Options, timescales and measuring success

What other options were considered?

- 39 Setting up an HBV is a discretionary not a statutory role and therefore the Council could do nothing and not engage with the system of biodiversity units, leaving it wholly up to the private market to deliver off-site benefits associated with BNG. This would have fewer resource implications and risks but leave biodiversity recovery to others to implement and reduce the likelihood of such improvements across the district, if insufficient suitable land could be found within Leeds. It would also cut off a significant income stream for the improvement of nature on Council-owned land. This is not seen as a realistic option as the benefits of nature as set out above are significant and align well with the Council's 3 pillars.
- 40 The Council has considered and discounted the role of Section 106 obligations to sell biodiversity units, in much the same way as current delivery of policy requirements such as greenspace and affordable housing. Such legal agreements bind the applicant to provide the policy requirement either on-site or off-site through making a "contribution in lieu". Whilst to date the Council has been delivering BNG through S106 obligations and Policy G9 of the Local Plan this will not be possible from February 2024 for major applications (subject to mandatory BNG starting) and from April 2024 for minor applications because of the need to comply with the Environment Act. The LPA would be unable to enter into a legal agreement with the Council because this would be unenforceable. Without the legal agreement the Council site cannot be registered as a gain site, and therefore cannot, under the terms of the Act (s100), be used for biodiversity improvements.
- 41 The Council, in partnership with other authorities, either individually or collectively, could set up a formal arms-length company which operates as a Habitat Bank. This option was explored and discounted; the current proposal gives a greater guarantee as to biodiversity gains being created within the District.
- 42 The Council, in partnership with other authorities or bodies, either individually or collectively operate a partnership approach involving the use of Conservation Covenants (CC). A CC is a new agreement established by the Environment Act 2021 between a landowner and a designated "responsible body" (RB) such as a conservation charity, public body or a for-profit body which has conservation of natural or heritage features of land as one of its key objectives. This is a private, voluntary agreement made for the public good which continues to be effective even if the land changes hand. The RB would oversee, monitor and perform due diligence on other authorities who were selling biodiversity units to use on their own land e.g. the City Council could perform an RB role for a neighbouring authority and vice versa.
- 43 Once established as a RB the organisation would take on responsibility for ensuring that all covenants created are registered as a local land charge, and for the submission of annual returns on the number of covenants being held and the total area of land included within them.
- 44 This would in effect give an external body control of Council land for the period of the CC e.g. in excess of 30 years. There is little evidence of how this approach works in practice. It may be attractive to local authorities who estimate that they will be selling small numbers of biodiversity units. For a District the size and complexity of Leeds, it is not considered to be a

suitable route at the current time due to its relative immaturity and lack of best practice. It is noted that other West Yorkshire authorities are considering this as an option, potentially with the Combined Authority operating as a responsible body, but these considerations are at an early stage.

How will success be measured?

- 45 Annual reports will be provided to Executive Board on the operation of the HBV, future priorities and with a focus on how many developers have used the HBV to deliver off-site units and how biodiversity across the District has been improved as a result.
- 46 One of the key requirements of the Environment Act 2021 is for frequent monitoring of biodiversity delivery across the country. There is therefore a requirement on local authorities to monitor and report back to government, and to record habitat sites on a national register.
- 47 The Environmental Improvement Plans that arise from the Act also include key performance indicators which the Council can use to monitor biodiversity delivery.

What is the timetable and who will be responsible for implementation?

- 48 Currently mandatory BNG for major applications is due to commence in February 2024, further guidance was released in mid-December 2023 and the actual commencement date is still awaited (at the time of writing). The setting up of an HBV does not have to commence at the same time but would ensure that developers have the option of buying Council units rather than turning to third parties.
- 49 Planning and Sustainable Development have undertaken significant work to date, in conjunction with other service areas and WY authorities and stakeholder partners, however the provision of a legal company with responsibility for management of habitat banking would ensure the separation of Council functions (as landowner and implementer) and LPA functions (as the decision making body). As indicated above it is recommended that a Biodiversity Board be set up consisting of officers from those service areas most likely to be involved.
- 50 A report to a future Executive Board is recommended to update on progress made and confirmation of the establishment to the HBV. Directors will progress with setting up the company through the Biodiversity Board and keep relevant Executive Members consulted.

Appendices

- Appendix 1: EDCI Screening.

Background papers

- None.