

Biodiversity Net Gain

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What is Biodiversity Net Gain?

Biodiversity Net Gain (BNG) is an approach to development that leaves biodiversity in a measurably better state than it was before the development occurred, with significant on-site and off-site habitats secured, monitored and maintained for a minimum of 30 years. We know that development often results in impacts on, and losses of nature. That's why BNG is the biggest thing to happen for nature recovery in England and represents a step change in how the impact of development should be considered through the statutory planning system. BNG will become mandatory from January 2024.

Implementing BNG requires following the mitigation hierarchy of '*avoid, mitigate and compensate*'. This means that avoiding impacts on biodiversity is the first priority. By reinforcing and complementing the mitigation hierarchy, mandatory BNG requires development to deliver more for nature; setting a requirement to increase biodiversity by a minimum of 10% net gain compared to the baseline position.

BNG aims to create new habitat as well as enhance existing habitats, ensuring the ecological connectivity they provide for wildlife is retained and improved. This means that moving forward, there will be greener development and better-quality places for wildlife to live and thrive and for people to enjoy.

Detailed information on BNG can be found in our [Biodiversity and Planning SPD \(southglos.gov.uk\)](https://southglos.gov.uk). Please note that the SPD was adopted in March 2023 and guidance on BNG is continuously evolving. Therefore, information within the SPD may be inaccurate due to a passage of time.

What is the legislation surrounding BNG?

The Government's rules for how the Planning system operates, and how decisions are made, is set out in the [National Planning Policy Framework \(NPPF\)](#). This states at paragraph 180 (d), that developments should "*secure measurable net gains for biodiversity*". Under the [Environment Act 2021](#), all planning permissions granted in England (with a few exemptions) will have to deliver 10% BNG from January 2024.

Our vision for nature recovery of 'More, Bigger, Better and Joined Up Habitat for Wildlife' is set out in the [South Gloucestershire Biodiversity Action Plan \(BAP\)](#) and our [Green Infrastructure Strategy 2021 – Greener Places](#).

Further guidance, including our interim objectives in relation to BNG, can be found in our [Biodiversity and Planning SPD \(southglos.gov.uk\)](#).

Will my development be exempt from BNG?

The following developments will be exempt from BNG:

- temporary exemption for small developments where an application for planning permission is made or has been granted before April 2024
- development with no impact on priority habitat and where impacts fall below the specified 'de minimis' threshold (site area of less than 25 m², or 5m long for linear habitats (such as hedgerows and rivers)).
- householder applications
- the high-speed railway network

- off-site gain developments, where habitats are being enhanced for wildlife
- certain self-build and custom build developments

If your development is exempt from BNG, we would still encourage proportionate species and habitat enhancements (such as new native planting and bat and bird boxes) to be incorporated into the scheme, as we all want to do our bit to support nature.

How do I carry out a BNG assessment?

BNG will be measured using [DEFRA's statutory biodiversity metric](#). This metric is intended to be used by an Ecologist. It uses changes in the extent and quality of habitats as a proxy for biodiversity and compares the habitat found on a site before and after development. In other words, all existing, retained, and proposed habitat types, their area, and condition are plugged into the BNG metric. The metric takes the before and after habitat unit score and calculates what percentage of net gain or net loss the development has resulted in.

Four key factors underpin this comparison:

- habitat size
- condition
- distinctiveness
- location

BNG can be achieved by retaining and enhancing existing habitats and creating new habitats. In order to retain, enhance and create the best environments for wildlife, an ecologist will be required to assess the baseline habitats on site before development. To do this an ecologist will survey the site and assess habitats and their condition. Following this they will recommend which habitats should be retained and enhanced as part of the scheme, to ensure that the mitigation hierarchy (avoid, mitigate, compensate) has been followed and that 10% BNG can be achieved.

This is an essential step in the BNG process, and it is therefore important that ecologists are brought into the design stage early. Developments will need to be designed in such a way that provides benefits to both people and nature and also reduces impacts on the wider environment.

What do I need to submit for BNG as part of my planning application?

A Biodiversity Net Gain Plan must be submitted to and approved by the Local Planning Authority (LPA). This will be a prior to commencement condition. The Biodiversity Net Gain Plan must include the following:

BNG DEFRA metric (excel)

- The completed excel metric spreadsheet used to calculate the pre-development biodiversity value and to approximate the post-development value. The excel metric provides the % result of the BNG assessment.

Please note that any habitats damaged or destroyed post 30th Jan 2020 will need to be included within the calculations based on their former condition.

BNG report (text document) and habitat maps (GIS)

- The pre-development biodiversity value of the site and proposed biodiversity value of the site post development (habitat details and unit scores, calculated using the excel metric).
- Results of habitat condition assessments with justifications.
- The project design steps taken to follow the mitigation hierarchy.
- The proposed approach to retain, enhance and create biodiversity on-site and justification as to how habitats will reach their proposed condition.
- Any proposed off-site biodiversity creations or enhancements (including the use of credits) that have been planned or arranged for the development.
- Map of baseline habitats and illustrative post-development habitat proposals, including retained and proposed new features (imagery should be produced using GIS software).

Do I need to submit anything prior to determination?

Prior to planning approval, you will need to attach a baseline metric calculation showing the site's biodiversity value before development. You should also provide information about how you intend to meet the BNG objective, including details of proposed significant on-site enhancements.

How can I minimise delays to my planning application?

The BNG decision making process should proceed without delays if:

- The mitigation hierarchy has been followed.
- The design of the development is landscape led and has clearly considered biodiversity at the very outset.
- There is agreement on the baseline habitat types, area and condition and adequate information submitted, regarding post-development proposals (including any offsite requirements).
- All site plans and documents match. The BNG Plan must be cross referenced with details in the arboriculture report, proposed site plans, soft landscaping plans and other landscape documents before submission.

How will BNG be secured?

Off-site BNG and significant on-site BNG will be secured via a S106 agreement. Details of proposed habitats and how their target conditions will be reached, will be provided in management plans submitted via a condition of planning.

What happens when I cannot achieve BNG on-site?

There will be times when achieving 10% BNG cannot be delivered on-site and off-site habitat creation or enhancement will be required.

There are four main offsetting options:

- The applicant creates/enhances habitat on their own, off-site land.
- The applicant pays a biodiversity fee to a third-party habitat broker, who will deliver and maintain the off-site habitats.
- The applicant pays a biodiversity fee to an LPA, who will deliver and maintain the off-site habitats.

As a last resort, the applicant can buy statutory credits from the government.

Table 3 in chapter 8 of the [Biodiversity and Planning SPD \(southglos.gov.uk\)](https://www.southglos.gov.uk) sets out the various potential offsetting options in more detail. However, as BNG is still in a transitional period some options are not currently available.

A **habitat bank** is a parcel of land where a significant uplift in biodiversity is created and sold to developers who have not been able to achieve BNG on site.

We intend to list local third-party habitat brokers, who can provide habitat banks, as and when they become available. The [Bristol Avon Catchment Market](https://www.bristol-avon-catchment-market.co.uk) is open for expression of interest for environmental credit requirements.

South Gloucestershire LPA might also want to perform this role of providing habitat banks. If this is something the LPA chooses to do, it should be noted that:

- The biodiversity fee will be based on the habitat units lost as part of the development.
- There will be an additional 15% administration fee on top of the biodiversity fee.
- The biodiversity fee will include the price of creating, maintaining and monitoring habitats for 30 years.
- A S106 Agreement or Unilateral Undertaking will be used to transfer the fee, alongside a trigger point. Any legal fees will be in addition to the biodiversity and administration fees.

Biodiversity fees are priced according to predictions from market assessments. Market analysis done [by eftec, commissioned by DEFRA](#) has indicated that £25,000 is realistic to cover habitat creation costs. Therefore, the biodiversity fee for one habitat unit will be in the range of £20,000 to £25,000 (index-linked) to be agreed with developers through the planning application determination process. We are continuing to keep this under review and further details can be provided on request.

Full details about the biodiversity metric calculation and what administration fees cover can be found in the [Biodiversity and Planning SPD \(southglos.gov.uk\)](https://www.southglos.gov.uk).

The Bigger Picture: why do we need to do more?

Despite legislation and policy to protect biodiversity and wildlife, the most recent [State of Nature report](#), published in 2019, suggests there has been a steep 13% decline in the average abundance of wildlife in the UK since the 1970s. This is due to a range of factors including changes in agriculture, development, and climate change. The scale and pace of this nature loss is causing critical impacts on the natural systems on which all life on earth depends. Locally, nationally, and globally it is recognised that urgent and more action is needed to respond to the [Climate and Nature Emergency](#).

Although in the UK certain sites and species are protected, there are limited mechanisms to value, maintain, enhance and create wildlife habitats beyond protected sites. As a result, most habitats continue to be lost to development and this reduces nature's ability to connect and thrive.

Nature is important in its own right, but it is also essential for the processes that support all life on Earth. The natural environment provides benefits to us all through [ecosystem services](#).

BNG links to a range of Council priorities including:

- action to respond to the Climate and Nature Emergency
- place-making to create more greener and nature rich places where people and nature thrive
- planning, design and management of high-quality green infrastructure to increase benefits across priorities
- access to greenspace and nature
- mental and physical health and wellbeing
- resilience to flooding, high temperatures and drought
- improving air and water quality