South Gloucestershire Council | June 2026

Technical Advice Note

South Gloucestershire Council

Delivering for you

Biodiversity Net Gain

Contents

1. 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 onsite and off-site habitats secured and maintained for a minimum of 30 years. Developers must follow the Biodiversity Gain Hierarchy and deliver 10% net gain onsite in the first instance, and, where this is not possible, by creating or enhancing off-site habitat, or purchasing registered off-site units. As a last resort, statutory credits can be purchased from the government.

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 aims to create new habitat as well as retain and 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.

2. 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*".

Biodiversity Net Gain (BNG) was brought into effect by the Environment Act 2021, introducing the mandatory requirement that all new developments, unless exempt, must deliver a minimum of 10% net gain from the baseline biodiversity value.

3. Will my development be exempt from BNG?

The Government has confirmed that mandatory biodiversity net gain applies to all development that falls under the Town and Country Planning Act 1990, unless exempt. A list of BNG exemptions can be found here.

The legislation only applies to applications submitted after the commencement date for that application type. Applications submitted prior to that date will be required to comply with the NPPF and local policy only.

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.

4. Why BNG is not solely a post permission matter

The BNG regulations put a pre commencement condition on all applications (unless exempt) which states that '*no development can commence until a Biodiversity Gain Plan has been submitted to and approved by the LPA'*. However, BNG is not solely a post determination matter, as the LPA has a legal duty to take account of the Biodiversity Gain Hierarchy (BGH) when reviewing and agreeing the BGP. The BGH emphasises that onsite BNG must be considered first, followed by registered off-site units and, as a last resort, statutory credits. Therefore, a considerable amount of information is required pre-determination to ensure that the BGH has been considered. The BGH is often adhered to following on from negotiations with the LPA which encourage design options to be revised. The LPA cannot enforce the BGH post determination through the pre-commencement condition, as the development proposals and masterplans will have already been approved.

The LPA must be satisfied that the biodiversity gain objective can be met and the gain legally secured for a minimum of 30 years. Consequently, it is essential that BNG is considered at the earliest possible stage of any proposal, ideally this should be undertaken at the site selection stage, but, if this is not possible, then the Metric should be used early in the design process to quantify and evaluate the impacts of different design options helping to ensure that the most cost effective ecological outcomes are achieved for the development.

Furthermore, S106 agreements must be signed prior to determination. The LPA therefore needs to know if 'significant' onsite habitat will be created or enhanced prior to determination, in order to secure monitoring fees.

Why BNG is not a post permission matter is also reinforced through the BNG PPG, which states: '*Biodiversity net gain, however, is not just a post-permission matter. To ensure the biodiversity gain objective is met and the condition can be discharged successfully, it is important biodiversity net gain is considered throughout the planning process.*'

'Specifically, prior to the submission of a relevant planning application, applicants are encouraged to consider biodiversity net gain early in the development process and factor it into site selection and design. Where appropriate, they should discuss the biodiversity net gain requirements for their development upfront with the relevant local planning authority utilising any pre-application advice services offered by them. This could help establish whether development proposals would be subject to biodiversity net gain and, if they are, enable feedback on the proposed strategy for achieving the biodiversity gain objective and consideration of the Biodiversity Gain Hierarchy to inform the design of the proposals.'

5. How is BNG achieved?

BNG can be achieved onsite, off-site or, as a last resort, through purchasing statutory credits. The Biodiversity Gain Hierarchy, which we have a duty to follow, states that onsite gains must be considered first, and only where this is demonstrably not possible, can off-site options be explored.

There are four ways in which BNG can be achieved:

1. Non-significant onsite
2. Significant onsite
3. Off-site (registered units)
4. Statutory Credits (last resort)

Each of these options requires different documents to be submitted as part of the application and will be secured differently to each other.

6. The statutory BNG metrics explained

The 'metric' is a calculation tool 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. The metric 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 area
- condition
- distinctiveness
- location

There are two versions of the statutory biodiversity metric. The Full version and a 'Small Sites Metric' (SSM). Any development can use the full version of the biodiversity metric. The full biodiversity metric requires **an ecologist** to complete it.

The SSM has requirements for when it is allowed to be used. The SSM can only be used for **minor developments which don't impact protected habitats or species**. The purpose of the SSM is to offer a simplified version of the Statutory metric with reduced competency requirements as it doesn't require as much technical input. Whilst an ecologist is not required to carry out the SSM, it must be carried out by a competent person **who can accurately assess existing onsite habitats.**

A minor development could include a:

- residential development where the number of dwellings is between 1 and 9 on a site of an area 1 hectare or less, or if the number of dwellings is unknown, the site area is less than 0.5 hectares
- commercial development where floor space created is less than 1,000 square metres or total site area is less than 1 hectare
- development that is not the winning and working of minerals or the use of land for mineral-working deposits
- development that is not waste development

7. How do I carry out a BNG assessment?

Site Selection and Scheme Design

It is essential that BNG is considered at the earliest possible stage of any proposal. Ideally, this should be undertaken at the site selection stage. There is an element of due diligence required when land is being considered for potential purchase and/or promotion for development on the net gain implications and potential costs. Having a clear understanding of the site you propose to select, and its biodiversity unit value upfront will determine the feasibility of delivery making it easier and more cost-effective to protect biodiversity from the outset.

The easiest way to avoid a negative impact on habitats and to maximise the gain for biodiversity that can be achieved from a development is to select a site that has low existing ecological value and has good potential for habitat creation and/or enhancement that will buffer or provide connectivity.

Habitat Degradation and Irreplaceable Habitats

If it is found that the habitat on site has been cleared, destroyed or degraded since the 30th of January 2020 so that the habitat is lost prior to the baseline survey, then the site will need to be reassessed using data (aerial imagery and other habitat data), from prior to the loss of the habitat.

If activities have taken place on land after 25 Aug 2023 (inclusive) in accordance with a planning application, and either:

- this development has still not begun; or
- is not completed

And:

- a new application is subsequently submitted to which BNG applies; and
- the baseline value has been significantly reduced due to those on-site activities

then the baseline value immediately before the activities took place will be used.

Any irreplaceable habitats and nationally designated sites for nature conservation within the development footprint must be identified. These should be included within the metric to give an indicative picture of the habitats on site, but these will require bespoke advice and separate consideration to ensure that impacts comply with existing national and local policy and legislation. If on site habitat mitigation measures are required for protected sites and species it should be noted that these can only count towards a no net loss and can never on their own deliver a net gain. Therefore, it is necessary to have an understanding of the type and extent of habitat required without including BNG. This is called additionality as the net gain has to be in addition to the other mitigation requirements.

Site Survey

A UK Habitat Classification (UK HAB) Survey must be undertaken. Where the full metric is being used, an ecologist will be required to assess the baseline habitats onsite before development. This will include recording which habitats are present and assessing their condition. The ecologist will then 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 onsite.

Survey Timing Constraints

Surveys of the development site to calculate the pre-development biodiversity value, should be carried out shortly before the submission of the planning application. This is to ensure that the pre-development biodiversity value is an accurate representation at the 'relevant date' at which the planning application was submitted. Older surveys can be used where there has been no material change to the onsite habitat. If there has been a material change since the survey, then an updated survey will be required.

Where botanical surveys are required to accurately assess habitats and their condition, these must be undertaken at an appropriate time of the year.

Run a BNG calculation for the development

Input pre and post development habitats into the metric, whilst strictly adhering to the Statutory Biodiversity User Guide. Prioritise retaining and enhancing existing habitats.

Correctly assign Strategic Significance multiplier

As the LNRS has now been launched for the West of England (WoE), you should refer to Table 7 of the Statutory Biodiversity User Guide on how to apply the strategic significance multiplier.

In order to ascertain whether your site falls within the LNRS, you can use the LNRS BNG Strategic Significance Map. More information can be found within the WoE LNRS Toolkit.

Apply the Biodiversity Gain Hierarchy

If you have not achieved 10% net gain onsite, can you make tweaks to the design scheme to allow more room for habitat retention, enhancement and creation? Only when this is demonstrated to not be possible, should you look to achieve your BNG off-site.

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

SGC Local List outlines our requirements for applications subject to mandatory BNG. These documents have been identified as necessary to ensure that applications are 'front-loaded'; preventing delays and ensuring that the LPA has sufficient information as part of the planning application, to ascertain how a development will achieve 10% BNG. Our Biodiversity Net Gain Local List Requirements are as follows:

A draft Biodiversity Net Gain Plan setting out how a minimum of 10% BNG will be achieved, which must include a completed draft metric for the proposed scheme and information demonstrating the following points:

- *The pre-development habitat survey and biodiversity value, *[including the results of condition assessments if using the full metric];*
- *How the mitigation hierarchy and BNG hierarchy has been followed;*
- *How the Metric Principles and Good Practice Principles are being adhered to;*
- *The approach taken to retain, create and enhance onsite habitats, taking account of other requirements for greenspace within the development;*
- *How any need for off-site units will be met;*
- *The expected post-development biodiversity value and result of the draft BNG calculation.*

This must [be prepared by a professional ecologist with suitable qualifications and experience and] be in accordance with the British Standard BS8683 'Process for designing and implementing biodiversity net gain – specification'. The Biodiversity Net Gain Plan must be accompanied by the completed, draft excel metric in addition to pre and post development habitat maps.*
**[does not apply to minor developments using the SSM]*

Therefore, the following documents must be submitted in order for your planning application to be validated:

1. Draft Biodiversity Gain Plan
2. Pre and post development habitat maps
3. Draft metric calculation

The below provides more information on each of these local validation requirements:

Draft Biodiversity Gain Plan

The Biodiversity Gain Plan sets out how the biodiversity gain objective of at least a 10% gain will be met for the development. The Government has produced a Biodiversity Gain Plan template. It is not a legal requirement for applicants to use the template, but we should strongly encourage it's use. The PPG sets out what must be included within a Biodiversity Gain Plan.

Pre and Post Development Habitat Maps

Two habitat maps are necessary: one showing pre-development habitats and one showing post-development habitats. **Habitat maps must exactly match habitats that have been inputted into the metric and be labelled using UKHab Classification** and have a:

- North arrow
- Scale bar
- Key, showing relevant UK Hab classification symbology (Appendix A)

Draft Metric Calculation

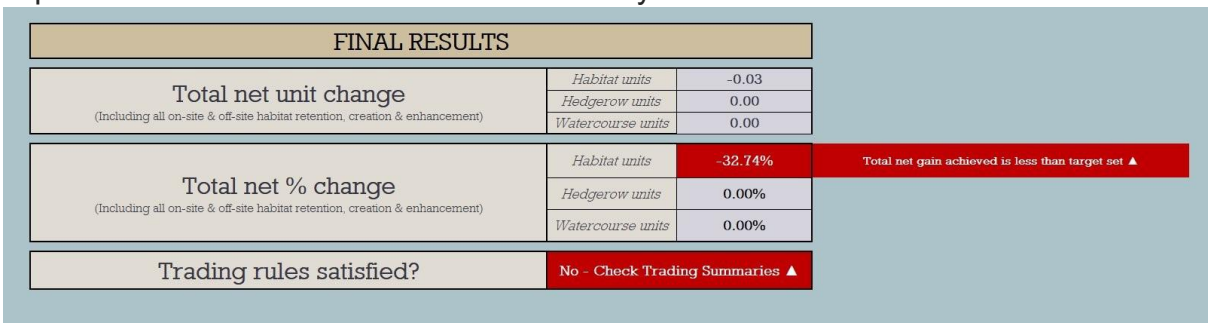
Please read the Statutory Biodiversity User Guide before completing your metric calculation.

See Section 6 for more information on the statutory metric. Before submitting the metric to the LPA, the following must be considered:

- The metric must be submitted in Excel format (not PDF or other form).
- Only the Statutory Biodiversity Metrics can be used (no previous versions (3.0, 3.1, 4.0) allowed).
- The onsite habitat baseline tab must be completed.
- The onsite habitat creation tab must be completed.
- The statutory biodiversity user guides must have been followed

Only the following red error boxes are acceptable. These red error boxes show that 10% net gain has not been achieved onsite and the applicant will need to have discussions with the ecology team on how best to achieve their 10% net gain off-site. If any other red error boxes are showing, you must not submit the metric to the LPA as it has been completed incorrectly. You should instead refer to the statutory metric user guide or consult an ecologist.

Acceptable red error boxes in the full biodiversity metric:



FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.03	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-32.74%	Total net gain achieved is less than target set ▲
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
Trading rules satisfied?	No - Check Trading Summaries ▲		

Acceptable red error boxes in the small sites metric:

Headline Results

Headline		BNG Targets Not Met ▲	
Trading Rules		Trading Rules Not Satisfied ▲	
Next steps		Scheme alterations or offsite units required	
Baseline Units	*Habitat units*	4.5781	
	Hedgerow units	0.7550	
	Watercourse units	Zero Units Baseline	
Post-development Units	*Habitat units*	4.3061	
	Hedgerow units	1.4379	
	Watercourse units	0.0000	
Total net unit change	*Habitat units*	-0.2720	▲
	Hedgerow units	0.6829	✓
	Watercourse units	0.0000	
Total net % change	*Habitat units*	-5.94%	▲
	Hedgerow units	90.44%	✓
	Watercourse units	% target not appropriate	

9. Significant onsite gains

Where a scheme is creating or enhancing habitat onsite, the LPA will assess if any onsite habitats count as 'significant' gains. Government Guidance states:

'What counts as a significant enhancement will vary depending on the scale of development and existing habitat, but these would normally be:

- *habitats of medium or higher distinctiveness in the biodiversity metric*
- *habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development*
- *habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development*
- *areas of habitat creation or enhancement which are significant in area relative to the size of the development*
- *enhancements to habitat condition, for example from poor or moderate to good*

Examples of significant enhancements include creating a wildlife pond or a nature park.'

Ultimately, this means that almost all developments delivering BNG within the redline boundary will be considered to provide 'significant' habitat gains.

Where it is considered that there is significant gains, the LPA will be responsible for the long-term monitoring of the ongoing establishment of the habitat(s) (in other words, the LPA is responsible for monitoring the monitoring). Throughout the 30-year monitoring period, the LPA will need to review submitted monitoring reports, conduct site visits to verify results and undertake compliance checks and issue completion certificates once the habitats have been delivered. To financially be able to carry out this new and additional duty, the LPA will take a monitoring fee contribution.

Monitoring fees are calculated using SGC Monitoring Fee Calculator. The calculator takes into consideration the size of the site in question and the technical difficulty of the proposed habitats. The technical difficulty of the most difficult proposed habitat is used. The calculator was originally shared via the Planning Advisory Service (PAS) forum and has been checked over by South Glos Council finance team. It covers inflation and corporate overheads and is based on a Senior Ecologist day rate.

The monitoring fee must be secured via a S106. S106's cannot be signed post-permission.

10. Habitat Management and Monitoring Plans

Where there are significant onsite gains, a Habitat Management and Monitoring Plan (HMMP) will be attached as a condition of planning. Whilst the BGP demonstrates that the 10% net gain objective can be met, the HMMP establishes how the creation and enhancement of proposed BNG habitats will be achieved and secures the long-term monitoring of BNG habitats. The HMMP must set out robust and comprehensive monitoring schedules, specifically detailing work activities and when they are to be carried out. Which month and year monitoring reports will be submitted to the LPA must be explicitly stated.

It is strongly advised that the applicant/ ecologist refers to Natural England's HMMP template which sets out clear responsibilities, tables and schedules for achieving and monitoring habitat progression and target conditions.

Monitoring reports will be a condition of planning and will be submitted to the LPA as per the schedules set out in the HMMP. The monitoring reports are necessary to ensure that habitat creation and enhancement works are on track to reach target conditions and habitat completion and provide remedial measures, where necessary.

Where on site gains are not deemed to be 'significant', long term management will be secured via a LEMP.

11. What happens if I cannot achieve BNG onsite?

Purchasing Off-site Units

Where it is not possible to achieve 10% net gain on site, registered biodiversity units can be purchased. Biodiversity units from Biodiversity Gain Sites must meet the following criteria before they can be included as part of the BGP. They must:

1. be legally secured via a S106 agreement or Conservation Covenant,
2. be registered on the national Biodiversity Gain Sites Register,
3. be allocated to the development on the national register once planning permission is granted

You can search the Biodiversity Gain Sites Register to check that Biodiversity Gain Sites are registered.

Prior to determination, and once draft BNG documents are acceptable, the LPA needs to agree that purchasing off-site units is appropriate for the scheme.

In order for the general biodiversity gain condition to be discharged, the LPA will check that the units have been allocated to the development on the biodiversity gain sites register. Off-site tabs of the metric are to be completed by the off-site provider and submitted as part of the condition discharge.

Purchasing Statutory Credits (last resort)

As a last resort a developer can purchase statutory biodiversity credits from the Government. They can only be purchased when BNG cannot be achieved onsite and where there are no suitable off-site biodiversity units available on the market.

Before a developer can purchase statutory credits, the LPA must give them permission to do so, and this must be done as part of the application to agree the draft BGP. The developer will need to include the following in their draft BGP:

1. Evidence that they considered on-site BNG and the reasons why this is not possible.

2. Evidence that the developer approached 3 local or national suppliers, habitat banks or trading websites and that insufficient off-site options are available in England. For example, correspondence emails or a PDF download showing a marketplace search.

If a developer needs less than 0.25 biodiversity units (area or linear), they can buy statutory credits without following step 2 above (showing evidence that insufficient off-site options are available). Further guidance can be found here: how to prove statutory credits are needed.

Please note that as there are now many registered off-site units available in England, and, because we have a statutory duty to follow the Biodiversity Gain Hierarchy, the LPA is unlikely to permit developers to purchase Statutory Credits.

12. What if I own land outside of my application boundary that I want to use for BNG offsetting?

In order for off-site biodiversity units to be allocated to a development, they must be registered on the Biodiversity Gain Sites Register and therefore be legally secured via a S106 with the relevant LPA or via a conservation covenant with a Responsible Body. Unfortunately, South Gloucestershire Council cannot facilitate the registration of biodiversity units created by private landowners at the moment. This is because we do not have a Habitat Bank Regulatory Service set up, required to secure biodiversity units. To register off-site units, rigorous checks must be undertaken. These include, but are not limited to:

- Legal checks such as ownership, existing consents, enforcement action, grants etc on the proposed land.
- Adequate UKHAB baseline survey undertaken by a competent ecologist.
- Completed metric calculation showing how many BU the habitat bank could provide.
- Robust HMMP (spanning 30 years) demonstrating how the proposed habitats will be created, managed and monitored.
- Location of landholding and additionality - is the landholding in the LNRS and does it provide ecological additionality i.e. climate change mitigation, flood resilience etc.

- Competency - does the landowner have the necessary skills to deliver the habitat work and the cashflow model/financial assurance to support this for 30 years.
- Is the landowner willing to enter into a S106 with SGC and undertake compliance checks.

This extensive process could take years to complete.

13. A note on private gardens

Private gardens have a blanket habitat classification as 'vegetated garden' or 'unvegetated garden' in the statutory metric. When creating new private gardens, you cannot record individual habitat parcels in the metric. Additionally, you cannot record newly planted trees. This is because the creation or enhancement of these habitats cannot be secured or enforced against.

It is **not** possible to 'fence' off an area of your garden for BNG purposes, as this area is still within private curtilage and cannot be secured.

Please note that when inputting existing private gardens into the metric, you must record all medium, large and very large individual trees, or other important biodiverse habitats such as hedgerows or ponds, at the baseline. Please see the Statutory Biodiversity User Guide for more information.

14. Which post-development habitats can I create?

In most situations, only relatively simple low-maintenance habitats should be targeted within the development site. This is to ensure that the proposed habitats are realistically deliverable and can be successfully managed to achieve the intended biodiversity value in the long-term.

There are several simple and robust habitat types that are relatively easy to create and maintain, which will still deliver good biodiversity value. The choice of habitat types will depend on the soils, drainage and aspect of the site, and will still need to be informed by professional judgement. Types of habitats realistically deliverable on most development sites include:

- Deciduous plantation woodland;
- Ponds (depending on geology and drainage);
- Scrub;
- Hedgerows;
- Medium distinctiveness grasslands can be established and managed on some sites, but this will depend on the availability of appropriate management skills, the size of the area (and degree of isolation) and the likely levels of disturbance.
- Scattered native trees; and
- Orchards.

The target condition for the habitats to be created or restored on site should, in most cases, be classed as moderate. It is very unlikely that grassland and scrub habitats, particularly within urban/suburban environments, would reach anything more than moderate condition.

In such situations, a scheme which proposes that it can achieve a high distinctiveness habitat (such as lowland meadows and limestone grasslands) will not be accepted unless there is a very sound justification and a strong chance of success in the long-term.

15. How do I discharge the General Biodiversity Gain Condition?

To be able to discharge the general biodiversity gain condition, the following must be submitted:

- A Biodiversity Gain Plan in the format of the government's template.
- Final versions of the already agreed draft BNG documents submitted (with off-site tabs of the metric completed where relevant).
- Proof of purchase of any statutory credits (if relevant).

The allocation of any purchased off-site units will be checked on the biodiversity gain sites register (if relevant).

16. How can I minimise delays to my planning application?

The BNG decision making process should proceed without delays if:

- The statutory biodiversity user guides have been followed.
- The biodiversity gain hierarchy has been followed.
- Sufficient survey effort and information has been provided.
- The design of the development is nature 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 off-site 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.

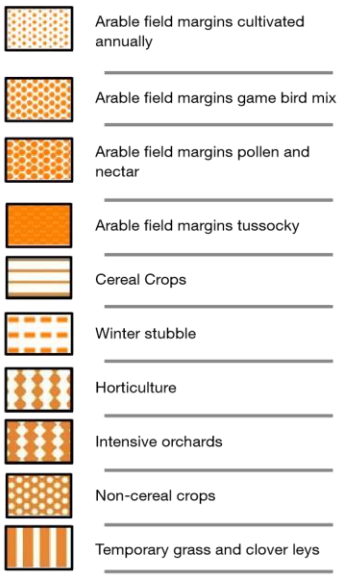
17. Useful links and further information

Guidance on the legislation is provided by Government on the GOV.UK webpages and includes Planning Practice Guidance (PPG) on:

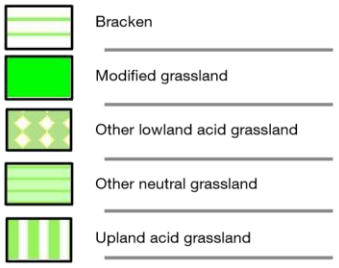
- About biodiversity gain
- Biodiversity net gain: Submitting a planning application
- Determination of the planning application
- Submission of the Biodiversity Gain Plan
- Determination of the Biodiversity Gain Plan
- Appeals on a Biodiversity Gain Plan
- Phased development
- Biodiversity Net Gain Collection

Appendix A – UK Hab Classification Symbology

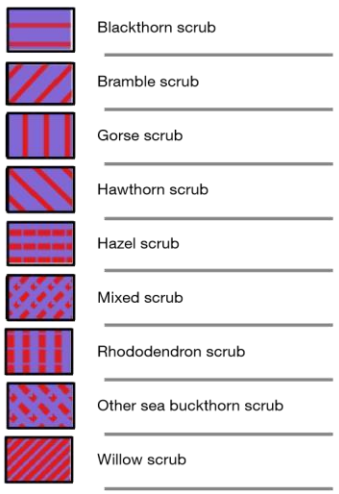
CROPLAND | Area-based habitats



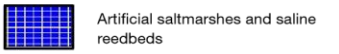
GRASSLAND | Area-based habitats



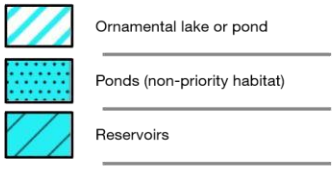
HEATHLAND & SCRUB | Area-based habitats



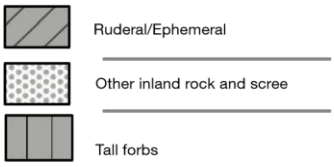
COASTAL SALTMARSH | Area-based habitats



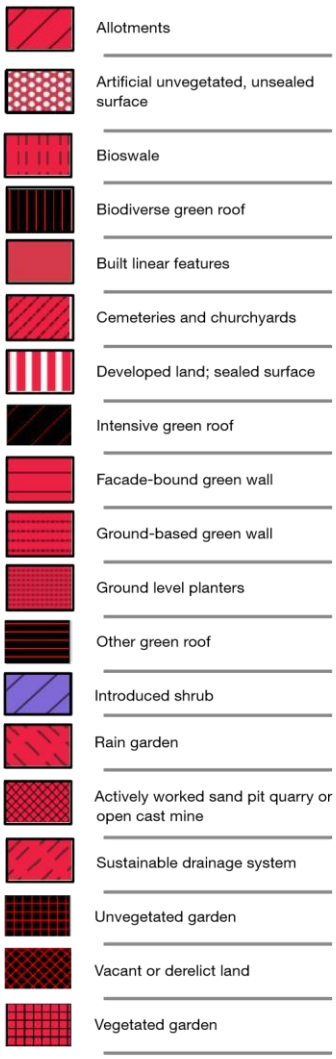
LAKES | Area-based habitats



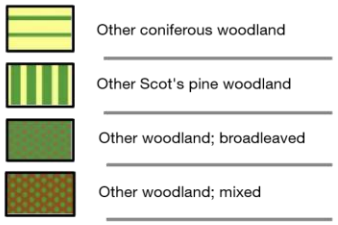
SPARSELY VEGETATED LAND | Area-based habitats



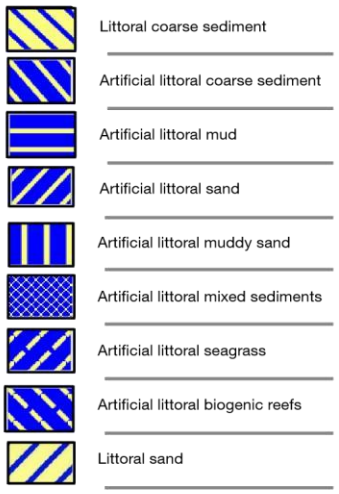
URBAN | Area-based habitats



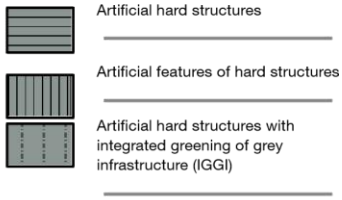
WOODLAND AND FOREST | Area-based habitats



INTERTIDAL SEDIMENT | Area-based habitats



INTERTIDAL HARD STRUCTURES | Area-based habitats



ENHANCED AREAS | Area-based habitats

HEDGEROW AND LINE OF TREES | Linear habitats

Species-rich native hedgerow

Native hedgerow - associated with bank or ditch

Native hedgerow with trees

Native hedgerow

Non-native and ornamental hedgerow

Line of trees

Ecologically valuable line of trees

Line of trees - associated with bank or ditch

Ecologically valuable line of trees - associated with bank or ditch

RIVERS | Linear habitats

Ditches

Canals

Culvets

OTHER


Urban/rural tree