BRISTOL CITY COUNCIL BIODIVERSITY NET GAIN PRACTICE NOTE

April 2025

Purpose of this document

The purpose of this document is to provide guidance on the application of Biodiversity Net Gain (BNG) within the planning system of Bristol City Council. It is intended to be used as a reference document to support development within Bristol, providing information and advice on how to successfully apply BNG.

The primary audience for this document is developers, planners, ecologists and landscape architects. It is expected that all applicants will have read this document prior to any applications.

This document is intended to work alongside policies and strategies within other sectors, such as climate change, sustainability, and green infrastructure, due to the interconnected nature of the overall environmental approach.

This is a live document which will be updated as more information on BNG is released, and relevant strategies and policies are developed. Each version will be dated.

This Practice Note provides information that is relevant to the planning requirement for Biodiversity net gain. To avoid repetition and to ensure that the most up to date version is used within an application, where appropriate, reference has been made to documents and links that provide further information on that topic.

Version Control

Version	Date	Author	Review	Updates
1.0	January 2025	**BNG Officer:** S. Hawes	**Planning Policy Officer:** M. Wilberforce, **Head of Planning:** S. Wilding	
2.0	April 2025	**BNG Officer:** S. Hawes		(1) Additional images. (2) Local policies Section updated. (3) Further information on watercourse assessment delivery. (4) Information on biodiversity gain plan draft submission. (5) Update to Individual Trees Section.

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1. INTRODUCTION

1.1 What is Biodiversity Net Gain

1.1.1 Biodiversity Net Gain (BNG) is an approach that enables developments to quantitatively measure and mitigate the impact a proposed scheme will have on biodiversity.

1.1.2 A minimum **10% net gain** in biodiversity became mandatory for major developments on the **12th February 2024** and for small sites on the **2nd of April 2024** (exemptions apply). BNG is a legal requirement made mandatory **under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)**. For applications made prior to mandatory BNG, the developments are required to demonstrate a **'measurable net gain'** using the BNG approach (exemptions apply). BNG is an approach to design that informs and enables a net loss in biodiversity through development to be avoided.

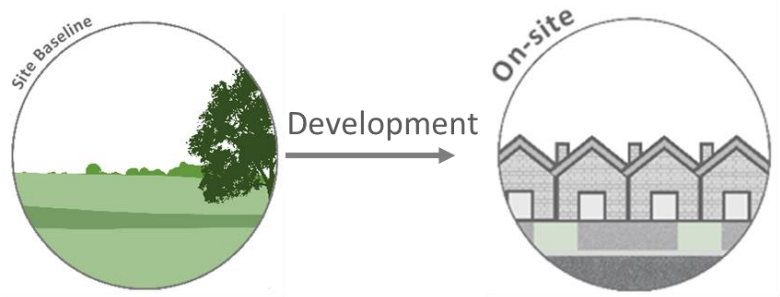


Figure 1: The BNG approach aims to reduce the loss of biodiversity as a consequence of development.

1.1.3 By having a measurable approach to development through the application of BNG and the requirement to meet a minimum 10% gain, there is opportunity to deliver for nature both on-site and, where required, off-site.

Figure 2: A net gain in biodiversity should be delivered on-site and off-site as required.

1.1.4 The BNG approach comprises **guidance**, **principles**, **rules**, and a **metric tool** to provide a quantitative and consistent way to measure biodiversity value and deliver a net gain.

1.2 How it works: Baseline Assessment

1.2.1 BNG uses habitat as a proxy for biodiversity.

1.2.2 The baseline biodiversity value of the Site (red line boundary) must be assessed by a qualified ecologist[1] using desk-based study and field surveys[2]. The field surveys will comprise of a **UK Habitat Survey** (which can be carried out as part of an Ecological Impact Assessment) and a **Habitat Condition Assessment**.

1.2.3 This information will be inputted into the **metric**; a tool used to calculate the change in biodiversity value. The information required to input into the metric includes:

- **Habitat Type:** A distinctiveness score is automatically assigned to each habitat type. For example, lowland meadow is assigned a score of very high, whereas modified grassland is assigned a score of low.

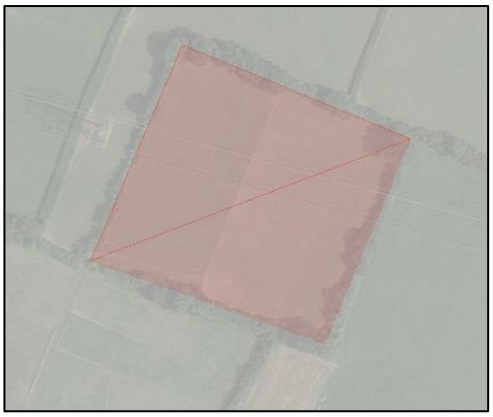
Modified grassland

Lowland Meadow

[1] The small-site metric does not need to be completed by an ecologist, however, must be completed by someone who is considered qualified.

[2] The ecologist must be a qualified assessor to undertake a watercourse assessment.

- **Area/Length:** Using GIS software, the area (ha) for area habitats is measured and length (km) is used for hedgerows and watercourses.



Area (ha)

Length (Km)

- **Condition:** Condition is a measure of the state of the habitat and is often linked to the current and/or previous management of the land (Example of a section of a condition assessment shown in Figure 3 below).

	Condition Assessment Criteria	Criterion passed (Yes or No)	Notes (such as justification)
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to Footnote 3 suboptimal species which may be listed in the UKHab description).[1] **Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.**	No	The grassland parcel lacks in typical indicator species for Other Neutral Grassland. See accompanying BNG report Section 5 p23 for further information.
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Yes	The grassland parcel is under light grazing pressure from cattle. At the point of the survey a varied sward height was recorded with approx. 35% over 7cm and 40% under.
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens[2].	Yes	Rabbit warrens are present on site and bare ground was recorded in areas where the grassland is subjet to increased pressure from use by cattle. Bare ground

Figure 3: Example of a condition assessment for Medium, high and very high distinctiveness grassland)

- **Strategic significance:** The strategic significance multiplier is applied to capture the added value to nature of certain habitat types in specific locations. This will be different for each LPA. Once published, the Local Nature Recovery Strategy (LNRS) must be used to determine when to apply this uplift in biodiversity value.

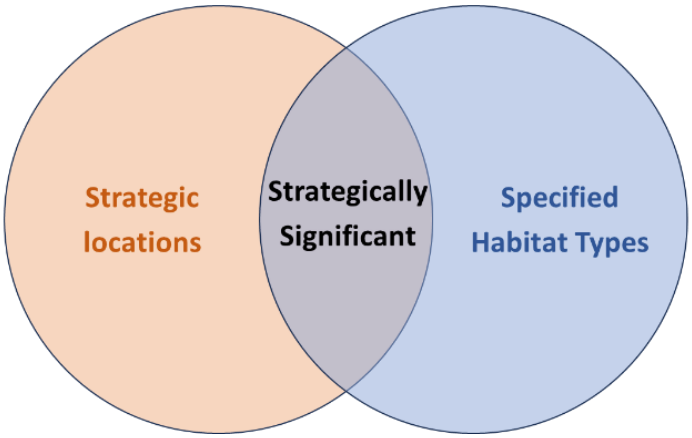


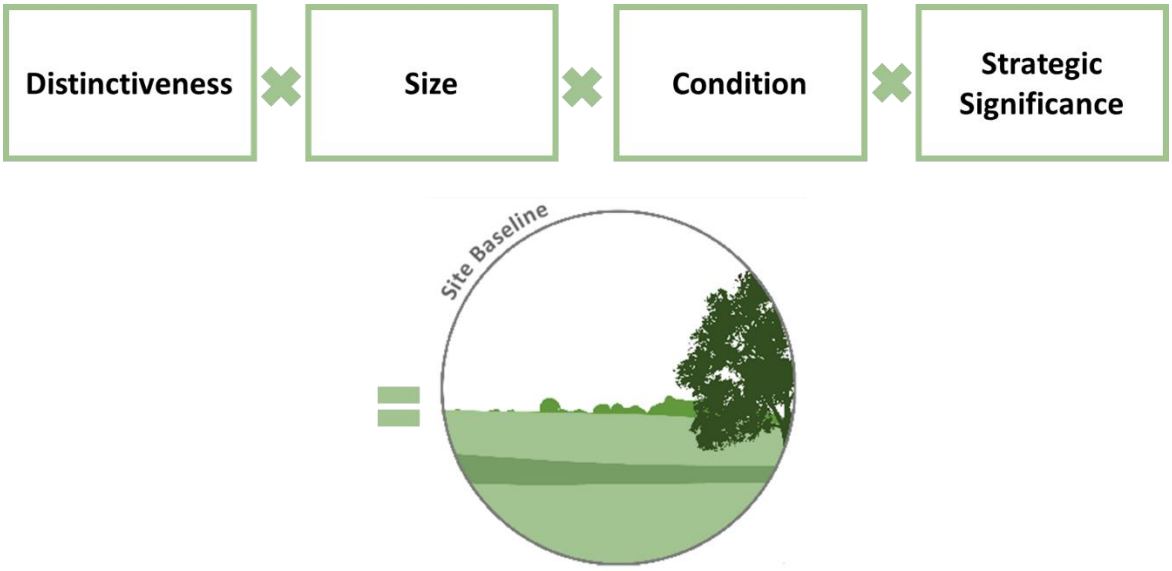
Figure 4: Diagram demonstrating concept of strategic significance.

1.2.4 As part of the baseline assessment a map of the habitat coverage will need to be produced (see Figure below).

Habitat Map Example

Figure 5: Baseline BNG map showing habitat coverage on-site.

1.2.5 The scoring is calculated within the metric and a final biodiversity value measured in **biodiversity units** is produced for each habitat parcel (as shown within the Figure above, the survey site is split into its different distinct habitat types), adding up to produce a baseline biodiversity value. The calculation applied to determine the baseline value is shown below:



Baseline Biodiversity Unit Value

1.2.6 The biodiversity value for each habitat parcel is added together to provide the overall baseline value for the site.

1.2.7 The baseline information should be used to inform the development proposals and design.

1.3 How it works: Post-development Assessment

1.3.1 **The development proposals** are used to determine the biodiversity value following development. This will include consideration of the proposed clearance, habitat creation and retention, as well as future management.

1.3.2 In addition to an ecologist, the project should have input from a **multi-disciplinary team** which may include landscape architects, architects, arboriculturists, hydrologists, planners, engineers etc. particularly for larger and more complex projects.

1.3.3 This information will inform the data inputted into the metric in terms of which areas of habitat will be lost, retained, enhanced, or created through interventions and changes in management.

- **Habitat retention:** This is habitat which will not be impacted (reduced in habitat distinctiveness or condition) by the development and will be retained as part of the scheme.
- **Habitat creation:** This is the proposed new habitat to be created as part of the scheme.
- **Habitat enhancement:** This is existing habitat which through management and/or intervention can be improved to a higher condition level (poor to

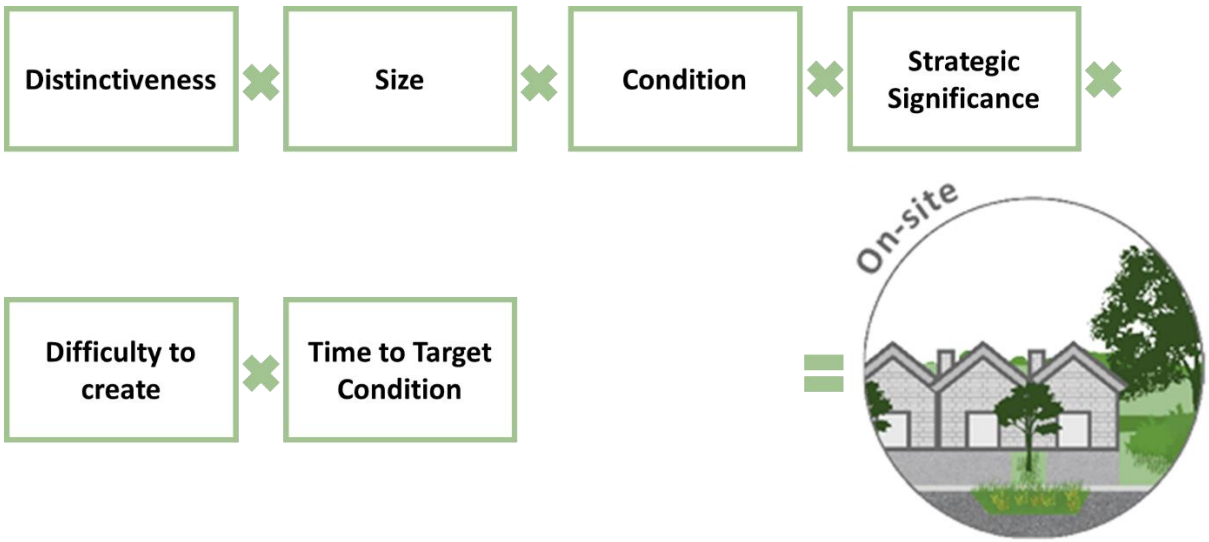
moderate, or moderate to good) and/or habitat type (e.g. modified grassland to other neutral grassland).

1.3.4 This information is mapped in order to produce areas/lengths which can be used within the metric calculation.

1.3.5 In addition to the habitat quality inputs stated above, risk multipliers (the risk of the target habitat and condition level not being met due to factors as outlined below) are also applied as part of the **post-development calculation**:

- **Habitat Created in Advance:** If habitats are created in advance, the years in advance can be inputted within the metric calculations. When created in advance the risk of not achieving the target habitat and condition is reduced, increasing the biodiversity units delivered for that habitat parcel.
- **Delay in Starting Habitat Creation**: Any delay in habitat creation or enhancement from the point of habitat clearance will need to be inputted into the metric. Delays increase the risk in biodiversity delivery and thereby reduce the units achieved for that habitat parcel.
- **Time to Target Condition:** The average time lag between the start of the habitat condition or enhancement and the target outcome is automatically applied. For example, for the creation of other neutral grassland in moderate condition a time to target condition of five years is automatically applied.
- **Difficulty of Creation:** The metric automatically assigns a difficulty score for the creation or enhancement of each habitat parcel proposed. This captures the difference in difficulty in creating some habitats over others.

1.3.6 The below calculation is carried out for each habitat parcel proposed to determine the score of the post-development plan.



1.4 How it works: Calculating Change in Biodiversity Value

1.4.1 The total net change in biodiversity units is calculated to determine if a net gain has been achieved.

Post-development Biodiversity value - Baseline Biodiversity Value

= Net change in biodiversity units

1.4.2 **Biodiversity net gain is an iterative process.** As such, sufficient time and resources should be included within the design process to allow for BNG calculations to be carried out as the scheme develops, with the results of the ecological and biodiversity assessments used to inform the design.

1.4.3 In addition to the delivery of a 10% gain, the scheme will need to demonstrate that the **Biodiversity Net Gain Rules** and **Principles** have been considered, and **Trading Rules** satisfied.

1.4.4 Note, BNG does not replace any species or habitat protection consideration and must work alongside any Ecological Impact Assessment (Kecia).

1.5 How it works: Off-Site Delivery

1.5.1 Where sufficient biodiversity units cannot be delivered on-site, habitat delivery can be secured off-site to reach the minimum 10% net gain for the project.

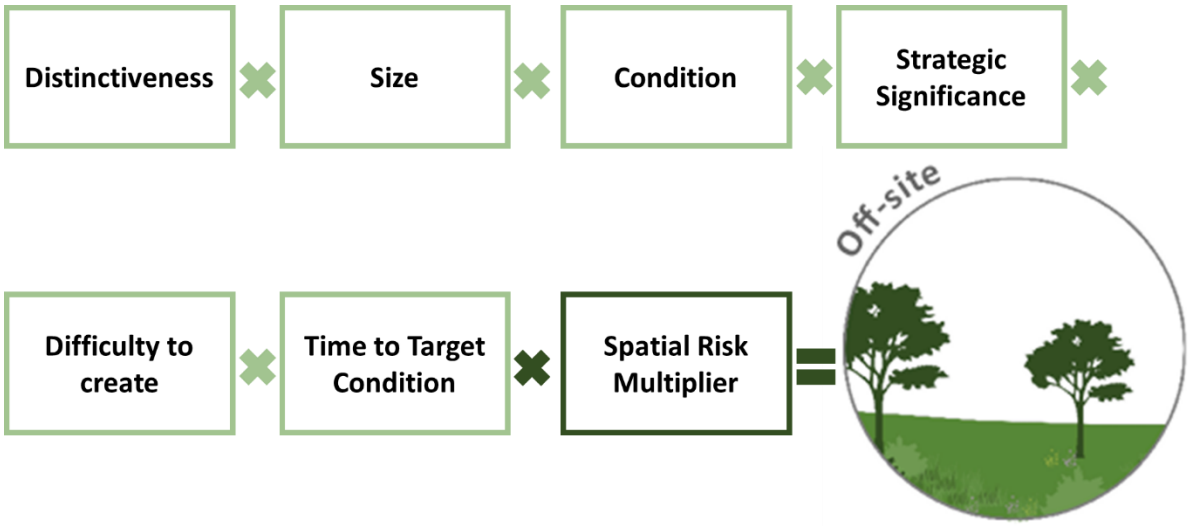
1.5.2 A similar process is carried out within the metric, with an additional consideration of the 'Spatial Risk Multiplier'. This considers the location of the off-site delivery in relation to the Local Planning Authority (LPA) and National Character Area (NCA) of where the site being impacted is located.

1.5.3 Off-site delivery can be assigned the following:

- Compensation inside LPA boundary or NCA of impact site
- Compensation outside LPA or NCA of impact site, but in neighbouring LPA or NCA
- Compensation outside LPA or NCA of impact site and neighbouring LPA or NCA

1.5.4 The further from the impact site the greater the penalty applied and the less units delivered.

1.5.5 The calculation is shown below:



1.6 Modules

1.6.1 Biodiversity net gain is considered separately for area habitats, hedgerows and watercourses. Referred to as modules, a 10% gain in each one will need to be achieved if present within the red line boundary.


Area habitats


Hedgerows and line of trees


Watercourses

1.6.2 Note: Watercourses include land, up to 10m from the top of the bank of the watercourse, therefore, even if the Site does not include the watercourse itself, if it is within 10m of the top of the bank the need to deliver 10% net gain for watercourses will need to be considered, unless it can be demonstrated that the proposed development is exempt.

2. WHEN DOES MANDATORY BNG APPLY

2.1 Application submission date

2.1.1 The mandatory 10% gain in biodiversity will only apply to applications **submitted** from the **12th February 2024 for major sites**, and from the **2nd April 2024 for small sites** (exemptions apply). Reserved matters applications will not be required to fulfil mandatory BNG if the outline application was submitted prior to these dates.

2.1.2 Applications made prior to mandatory BNG requirements may still be expected to carry out a BNG assessment with accompanying report and metric in order to demonstrate a **measurable gain** (exemptions apply).

2.1.3 Figure 6 below outlines when the mandatory BNG is applicable and if the development is considered major or small site.

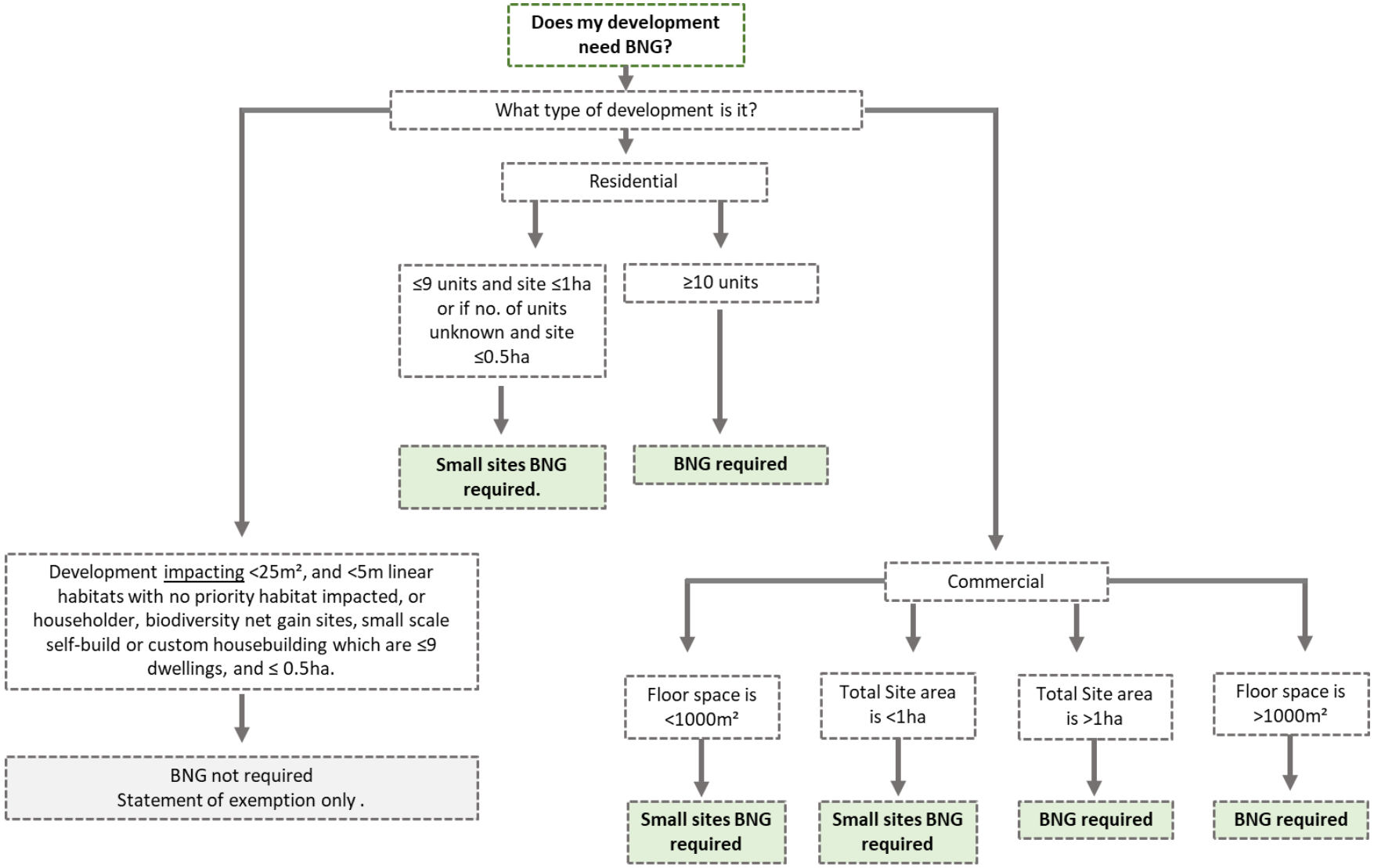


Figure 6: Diagram showing overview of when mandatory BNG applies.

2.2 BNG exemptions

2.2.1 Exemptions to mandatory 10% BNG are specified within The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

2.2.2 Exemptions include:

- Planning application made prior to the 12th February 2024 for major developments, and 2nd April 2024 for small sites.
- Development which does not impact (defined as decreasing the biodiversity value) **a priority habitat** and is impacting habitat of an area below a 'de minimis' threshold of **25m²** (5m by 5m), **or 5m for linear habitats** such as hedgerows;
- Householder applications, such as home extensions, conservatories or loft conversions;
- Biodiversity gain sites (where habitats are being enhanced for wildlife); and
- Small scale self-build and custom housebuilding which consists of **nine dwellings or less** and on a site of **0.5ha or less**.

2.2.3 If a development contains less than 25m² of area habitat, however, 5m or more of linear habitat, or vice-versa, then the exemption will not apply, and all habitats (area and linear) would be subject to mandatory BNG. If the exemption does apply, then there is no requirement to deliver BNG on that site.

2.2.4 As part of the initial planning application, a statement with clear and evidenced justification as to why the project is exempt from mandatory BNG requirement will need to be included.

2.2.5 A **statement of exemption template** is available and should be submitted at the point of initial application. This can be found on the Bristol Planning Policy and Guidance BNG webpage.

2.2.6 If the exemption cannot be clearly demonstrated with site plans, descriptions, and photos, it will be expected that a completed biodiversity assessment is provided to assess the impact from the development.

2.2.7 Further details can be found here Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk).

2.3 Small Sites Metric (SSM)

2.3.1 The Small Sites Metric is a version of the metric which can be used on sites defined as small under the Town and Country Planning (Development Management Procedure) (England) Order 2015). The SSM assessment will need to be completed by a competent person, however, not necessarily an ecologist (**SSM only**).

2.3.2 Competency is gained through a combination of training, qualifications, and experience. A description of the competency of the applicant must be included within the submitted BNG report. The developer is responsible for selecting the competent person for completing the SSM.

2.3.3 The users of the SSM will be expected to be able to identify:

- habitats present on-site (pre-development)
- management requirements for habitats to be created or enhanced within the landscape design (post-development)

2.3.4 Evidence for metric decisions should be provided and signposted within the 'User comments' column of the metric calculation tool.

2.3.5 There are a number of restrictions placed on the use of the SSM. The SSM should only be applied where:

- **Only the habitats available in the SSM are present on-site.** Any site containing any additional habitats (including riparian zones where relevant) not included in the SSM must use the statutory biodiversity metric calculation tool;
- **No priority habitats are present on-site.** Some hedgerows and arable field margins are excluded from this requirement as these are medium distinctiveness habitats and are included in the SSM;
- **No statutory protected sites or habitats are present;** and
- **No European protected species are present.**

2.3.6 The SSM does not have to be used for small sites, there is the option to use the Statutory Biodiversity Metric. The appropriate user guidance should be applied depending on the metric tool used.

2.3.7 Further information can be found within The Small Sites Metric (Statutory Biodiversity Metric) User Guide.

3. BASELINE VALUE AND HABITAT DEGRADATION

3.1 30th January 2020

3.1.1 Paragraph 6 of Schedule 7A of the Town and Country Planning Act 1990 makes provision relating to **unauthorised degradation** taking place on on-site. From the 30th January 2020, the baseline value should reflect the habitat coverage (type and condition) of the site prior to any interventions or activities which would cause habitat degradation. This includes activities such as felling of trees, cutting back scrub, or strimming of grassland site etc.

3.1.2 Any activities carried out after this date which result in habitat degradation (defined as a reduction in biodiversity value), will require the baseline value to be taken from the habitat coverage and condition immediately prior to any activities (DLUHC, 2023).

3.1.3 Exceptions to this are when these **activities** have been carried out **under planning permission**, prior to **25th August 2023**.

3.1.4 For example, if a woodland was felled outside of planning permission in 2022 and planning permission was applied for in 2023, the baseline would be dated prior to the felling activity, and the woodland value immediately prior to being felled included within the assessment.

3.2 25th August 2023

From the 25th August 2023 further habitat degradation consideration must be applied for **authorised degradation** of habitats under planning permission. As stated within paragraph 6A of Schedule 7A of the Town and Country Planning Act 1990.

"If –

(a) a person carries on activities on land on or after 25 August 2023 in accordance with a planning permission (other than the planning permission referred to in paragraph 5(1)),

(b) on the relevant date, development for which that other planning permission was granted—

(i) has not been begun, or

(ii) has been begun but has not been completed, and

(c) as a result of the activities the biodiversity value of the onsite habitat referred to in paragraph 5(1) is lower on the relevant date than it would otherwise have been,

the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities."

3.3 Precautionary Approach

3.3.1 In the scenario where there is insufficient evidence to determine the baseline value prior to the activities, then a 'precautionary approach' will be required. This approach will assign the highest habitat type value and habitat condition which is reasonably supported by any available evidence.

3.3.2 The implementation of this approach is to ensure that the biodiversity baseline of the site is not undervalued due to lack of evidence. It has the potential to produce a baseline value which is higher than what the original baseline would have been, however, ensures that there is no gain to be had from any unauthorised habitat degradation.

3.3.3 The approach to habitat degradation addressed above is included within the Town and Country Planning Act 1990 Schedule 7A, Paragraph 6A. The Precautionary Approach is stated within the Town and Country Planning Act 1990 Schedule 7A, Paragraph 6B.

"6B (1) This paragraph applies where there is insufficient evidence of the biodiversity value of an onsite habitat immediately before the carrying on of the activities referred to in paragraph 6 or 6A.

(2) The biodiversity value of the onsite habitat immediately before the carrying on of the activities referred to in paragraph 6 or 6A is to be taken to be the highest biodiversity value of the onsite habitat which is reasonably supported by any available evidence relating to the onsite habitat."

3.4 Biodiversity Gain Plan

3.4.1 Any habitat degradation will need to be included within the Biodiversity Net Gain Plan (to be submitted following planning approval). The form queries "*Is the relevant date for the pre-development biodiversity value the same date as the planning application*?" If an earlier date is required, this needs to be agreed with the LPA and stated within the Biodiversity Gain Plan.

Note: If an application is stating that the degradation of the habitat on-site occurred prior to the 30th January 2020 sufficient evidence that degradation occurred prior to this date will need to be produced as part of the application. In the scenario that no evidence can be provided, or the evidence provided is considered insufficient, the baseline biodiversity value will be expected to be taken prior to any interventions.

4. PLANNING PROCESS

4.1 General Process

4.1.1 For applications subject to mandatory BNG requirements, BNG is a consideration at the point of application and following approval prior to commencement.

At the point of initial application submission, the application must include either a statement of exemption (for which there is a template) if it meets the nationally set criteria for exemption, or a BNG report with corresponding metric.

The supporting documents will be assessed to ensure they are correctly carried out in line with the latest guidance and legislation. Further information may be requested.

Post-approval, prior to commencement, the Biodiversity Gain Plan must then be submitted with 'final versions' of any supporting documents (draft versions prior to this stage are welcomed). The Biodiversity gain condition automatically applies, however, depending on the information previously provided further conditions related to BNG may also apply.

The submitted Biodiversity Gain Plan and supporting documents will be assessed. On submission of the completed Biodiversity Gain Plan a response assessment can be expected within 8 weeks.

Following receipt of discharge of condition approval of the Biodiversity gain condition (and any related conditions) the works can commence. (Development on-site cannot commence prior to Biodiversity Gain Plan Approval).

Figure 7: Outline of BNG within the planning process.

4.2 Further Details

4.2.1 Early implementation of the BNG rules, principles and hierarchies will provide confidence in the ability of the development to successfully discharge the biodiversity gain condition and achieve 10% BNG later in the planning process.

4.2.2 Approved planning applications to which mandatory BNG requirements apply, will be subject to the statutory **'general biodiversity gain condition'** included within Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act.

4.2.3 At the point of submission of the Biodiversity Gain Plan the information provided should be able to demonstrate that the biodiversity gain objective is met. This includes proof of purchase of units and/or credits, as well as demonstration of delivery of biodiversity on-site which reflects the post-development plan approved at the planning application stage.

4.2.4 The Biodiversity Gain Plan and supporting documents is the mechanism to ensure that the biodiversity gain objective is met. The Biodiversity Gain Plan template provided by DEFRA must be used and can be found here Biodiversity gain plan - GOV.UK (www.gov.uk).

4.2.5 The assessment of the Biodiversity Gain Plan submitted will include consideration of the following:

- The documents have been submitted correctly, including the completed statutory metric;
- That the proposed habitat enhancement and creation is considered achievable;
- The habitat trading rules are satisfied;
- If applicable, that any off-site gains in the plan have been registered and recorded as allocated to the development in question, with the biodiversity value of the gains in the gain plan match the value recorded on the register;
- That the Biodiversity Gain Plan submitted accurately reflects the information submitted and approved as part of the planning application;
- Information provided on how the Biodiversity Gain Hierarchy has been correctly applied, and if not, justification for why this is not the case. The Biodiversity Gain Hierarchy is a material consideration and will be part of the consideration on determining whether to approve the Biodiversity Gain Plan;
- All supporting documents (Habitat Management and Monitoring Plans, Metrics, and reports) must accurately reflect the Biodiversity Gain Plan submitted; and
- GIS information (shape files) will also be expected to be submitted in order to assist in the 30 year management and monitoring of on-site and any off-site habitat delivery.

4.2.6 The LPA will provide reasons if it is decided that the Plan cannot be approved, including details on the elements which are considered to not satisfactorily meet the requirements.

4.2.7 LPAs are expected to decide whether to approve a biodiversity gain plan within eight weeks.

4.2.8 Development on-site cannot commence prior to Biodiversity Gain Plan Approval.

4.2.9 Where a planning condition or S106 agreement secures on-site gains or a S106 is used to secure off-site gains, the LPA will be expected to enforce the agreement. Where on-site or off-site gains are secured by a conservation covenant, the responsible body will enforce the agreement.

5. RULES, PRINCIPLES AND HIERARCHIES

5.1 Claiming Biodiversity Net Gain Units

5.1.1 As part of the delivery of BNG of 10%, the application needs to demonstrate within the documents and metric provided that the following has been considered as part of the planning application.

- Have the **Biodiversity Metric Rules** been followed?
- Have the **Biodiversity Metric Principles** been considered?
- Has the **Biodiversity Gain Hierarchy** been applied?
- Have the **Trading rules** been satisfied?
- Are **Very High Distinctiveness** or **Irreplaceable Habitats** being impacted?

5.2 Biodiversity Metric Rules

5.2.1 There are four rules that need to be adhered to in order to be able to state that a net gain has been achieved. See table below.

5.2.2 If the Biodiversity metric rules are not followed, a biodiversity net gain cannot be claimed.

Table 1: Biodiversity metric rules (DEFRA, 2024)

Rule number	Rule detail
Rule 1	The trading rules of the statutory biodiversity metric must be followed.
Rule 2	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.
Rule 3	To accurately apply the biodiversity metric formula, you must use the biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites.
Rule 4	In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

Deviations from Rule 4:

5.2.3 As stated within the Statutory Biodiversity metric User Guidance (DEFRA, 2024) you should not use rule 4 for most projects. It may be used in exceptional ecological circumstances, occurring when:

- the site has optimal conditions (such as soil condition, hydrology, nutrient status) for restoration of a wildlife-rich or historic natural habitat,
- and the project team has the expertise and resource to deliver the habitat with negligible risk of failure.

5.2.4 It can only be used where one or more of the following applies:

1. Highly complex landscape scale habitat changes such as creation of heathland or a heathland grassland mosaic
2. River re-meandering, or
3. Large-scale restoration of natural processes

5.2.5 If these requirements are met, and the application is looking to deviate from the standard metric methodology then the LPA must be consulted with at the earliest point possible (prior to the submission of the biodiversity gain plan) to ensure that this deviation is considered satisfactory.

5.2.6 Within the biodiversity gain plan submission documents the guidance should be followed as stated below.

5.2.7 You should indicate and explain clearly where and how rule 4 has been applied. Evidence will need to be inputted into the biodiversity metric tool (for example, in the user comments) to satisfy the relevant planning authority of the circumstances, showing:

- Justification of why the site has optimal conditions for the specific habitat intervention
- Specific ecological expertise relevant to the site
- Detail of the ecological benefits of the habitat intervention which were not realised by the statutory biodiversity metric

5.3 Biodiversity Metric Principles

5.3.1 The Biodiversity Metric Principles are used to inform the use of the metric tool. It should be clear within the planning application documents and subsequent biodiversity gain plan submission and associated documents, that these principles have been considered and applied.

Table 2: Biodiversity metric principles (DEFRA, 2024)

Principle number	Principle detail
Principle 1	The metric assessment should be completed by a **competent person.** Competency is aligned with the British Standard 'Process for designing and implementing biodiversity net gain (BS 8683:202)'.
Principle 2	The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.
Principle 3	This biodiversity metric should be used in accordance with **established good practice guidance and professional codes.**
Principle 4	The biodiversity metric is not a complex or comprehensive ecological model and is **not a substitute for expert ecological advice.**
Principle 5	Biodiversity units are a **proxy** for biodiversity and should be treated as relative values.
Principle 6	This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
Principle 7	Habitat interventions need to be **realistic and deliverable** within a relevant project timeframe.
Principle 8	Created and enhanced habitats should be, where practical and reasonable, **local** to any impact and deliver **strategically important** outcomes for nature conservation.
Principle 9	This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to: • **Maintain habitat extent** – supporting more, bigger, better and more joined up ecological networks. • Ensure that proposed or retained habitat parcels are **of sufficient size for ecological function.**

5.4 Biodiversity Gain Hierarchy

5.4.1 The Biodiversity Gain Hierarchy is set out within Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

37D (2) In determining whether to approve a biodiversity gain plan, the planning authority must take into account—

(a) how the biodiversity gain hierarchy is to be applied, and

(b) subject to paragraph (3), where the order of priority specified in that hierarchy is not to be applied—

(i) the reason for that, or

(ii) the absence of a reason.

5.4.2 Developers are encouraged to follow the Biodiversity Gain Hierarchy from the **earliest stage possible** when selecting a site and considering development proposals.

5.4.3 Local planning authorities are required to take into account the Biodiversity Gain Hierarchy when considering whether the **biodiversity objective** has been met and when determining whether to **approve the Biodiversity Gain Plan**.

5.4.4 The biodiversity gain hierarchy is shown within Figure 8 below.

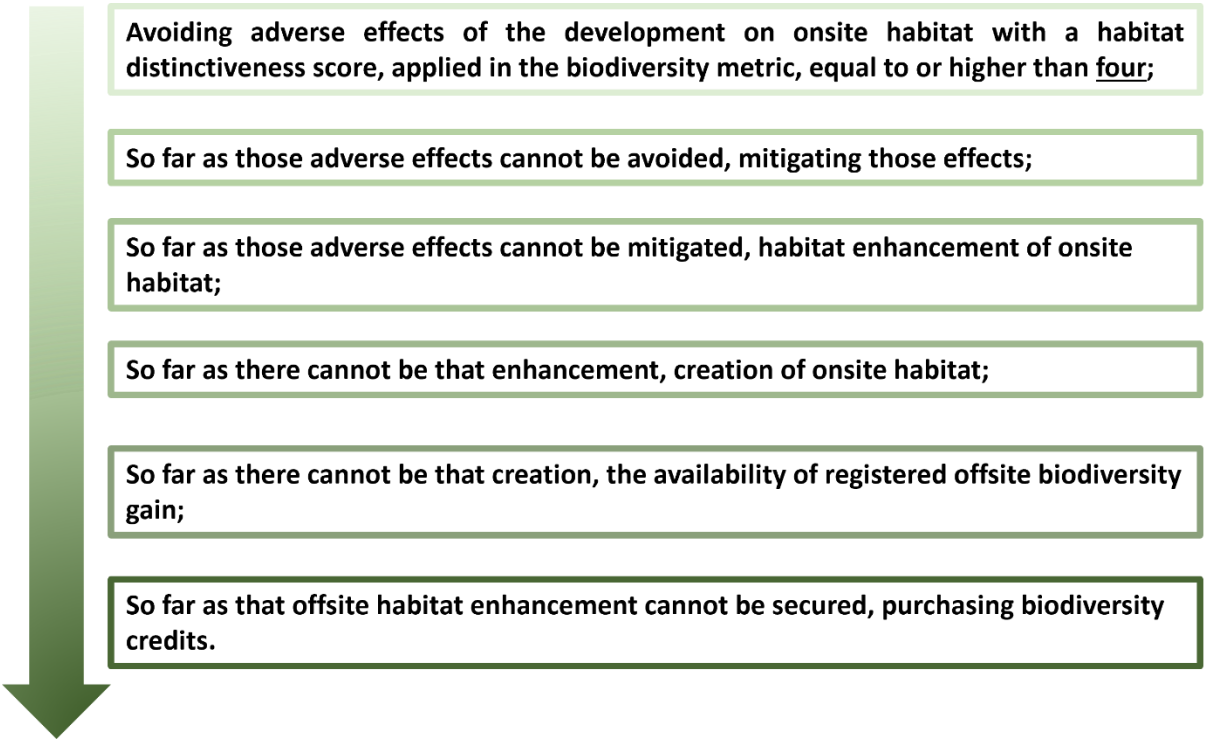


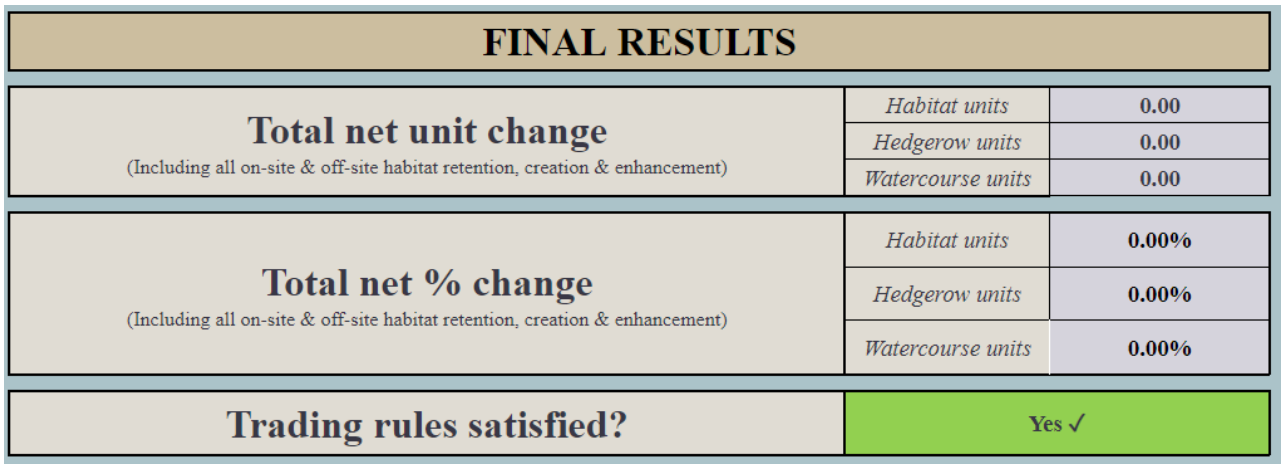
Figure 8: Biodiversity Gain Hierarchy which sets out a list of priority actions.

5.5 Trading Rules

5.5.1 The **trading rules** will need to be met as part of the process of achieving biodiversity net gain ("rule 1"). The Government's User Guidance (DEFRA, 2024) sets out "the **trading rules** set **minimum** habitat creation and enhancement requirements to compensate for specific habitat losses, **up to the point of no net loss**. They are based on the habitat type and **distinctiveness** of the lost habitat." (DEFRA, 2024)

5.5.2 Details of the rules can be found within the User Guidance (DEFRA, 2024). Ultimately the trading rules ensure that consideration goes beyond just the delivery of units and that the loss of one habitat is not compensated with another habitat of lesser or different value. For example, compensating for the loss of other neutral grassland with modified grassland (lower distinctiveness) or broadleaved woodland (different habitat which serves different species and functions).

5.5.3 The metric will calculate if the trading rules have been satisfied. The results section of the metric clearly displays this (see image below). In the scenario that the trading rules have not been met the design needs to be revisited and/or offsetting options explored until the trading rules for the proposed project are satisfied.



FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.00%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Figure 9: Example of final results summary within the Statutory Biodiversity Metric.

5.6 Very High Distinctiveness Habitats (VHDH)

5.6.1 **Very High Distinctiveness Habitats (VHDH)** are "*highly threatened, internationally scarce habitats which require conservation action*" (DEFRA, 2024).

5.6.2 **Impacts to these habitats should be avoided in line with planning policy.** These habitats cannot always be adequately compensated for due to difficulty in creation.

5.6.3 In the first instance effort should be made to find an alternative site or adjust the design to remove the impact to the Very High Distinctiveness Habitat.

5.6.4 The LPA should be engaged with at the earliest stage possible if the proposals have the potential to impact any VHDH.

5.7 Irreplaceable Habitats

5.7.1 "Irreplaceable habitats (as provided for in BNG regulations) are technically very difficult to recreate once destroyed (or recreation would take a significant amount of time). As such, the **BNG requirement is disapplied for these habitats**. Any losses or deterioration impacts to irreplaceable habitats **cannot be calculated by the biodiversity metric tool** and they are removed from the baseline" (DEFRA, 2024).

5.7.2 Within the emerging Bristol Local Plan "***Development resulting in the loss or deterioration of irreplaceable habitats will not be permitted***" (Bristol City Council , 2023).

5.7.3 The latest list of irreplaceable habitats published by Natural England should be consulted.

6. STRATEGIC SIGNIFICANCE

6.1 What is Strategic Significance

6.1.1 Strategic Significance *"Describes the local significance of the habitat based on its location and the habitat type*" (DEFRA, 2024).

6.1.2 Strategic significance is a multiplier within the biodiversity calculation which enables a higher value to be applied to habitat parcels of specific habitat type which are strategically located. As shown in Figure 10 below.

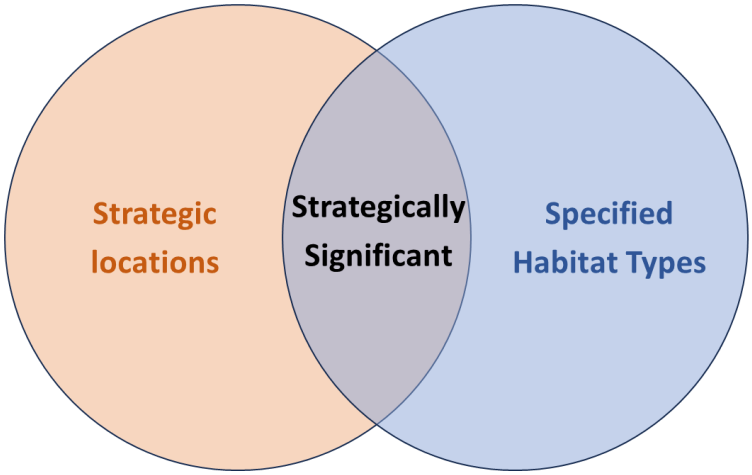


Figure 10: Diagram demonstrating concept of strategic significance.

6.1.3 Mandatory BNG is one of the key mechanisms to deliver for nature within the Local Nature Recovery Strategy (LNRS).

6.2 Local Nature Recovery Strategy

6.2.1 The LNRS is a spatial strategy which has been developed to identify priorities for nature and propose actions in specific locations. The Local Nature Recovery Strategy for Bristol is part of the wider LNRS for the West of England (WoE) produced by the West of England Combined Authority.

6.2.2 There are incentives to deliver habitats as specified within the LNRS. For example, the delivery of 1ha of broadleaved woodland in poor condition **outside** of a specified LNRS location would equate to the delivery of **3.35 units**. Whereas, within a location specified for broadleaved woodland creation within the LNRS, the unit delivery for the same type and area of habitat would equate to **3.85 units**.

6.3 Post publication of the LNRS

6.3.1 The LNRS platform was published in November 2024.

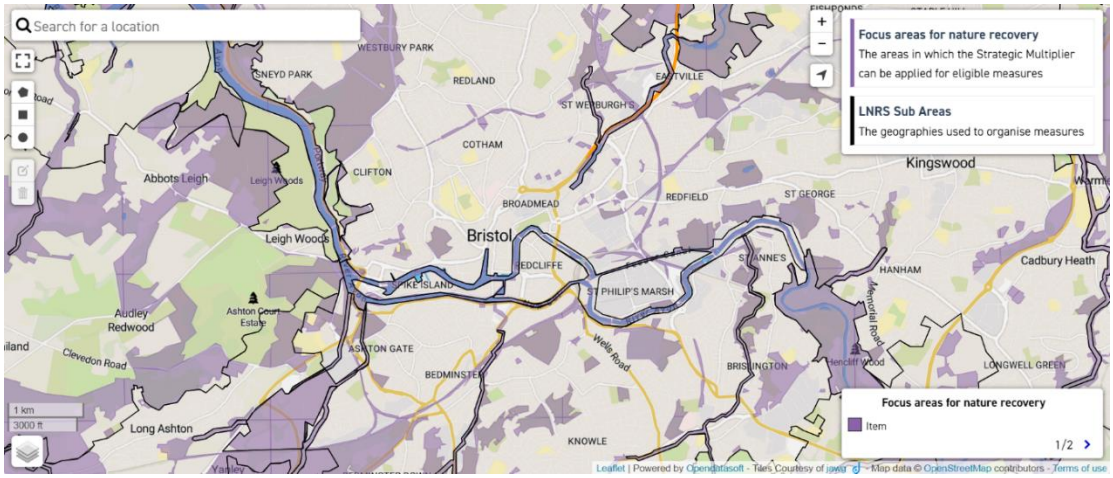


Figure 11: Local Nature Recovery Strategy Online Platform

6.3.2 The application of Strategic Significance must apply the below approach.

*Table 3: Approach to Strategic Significance to be applied when WoE LNRS **is available** (DEFRA, 2024)*

SS category	Score	Description
High (Formally identified in local strategy)	1.15	This category can be applied when: • the location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and • the intervention is consistent with the potential measure proposed for that location If your project delivers the mapped potential measure set out in the LNRS you should: • record strategic significance as low in the baseline • record strategic significance as high in post-development sheets • record that you have applied the published LNRS in your gain plan
Low (Area / compensation not in local strategy)	1.00	Where the definitions for high strategic significance are not met. Even if the project is an area mapped with a potential measure, if it does not deliver the specific actions outlined for that location you should record strategic significance as low.

7. SECURING BNG

7.1 Legally Securing BNG

7.1.1 The delivery of biodiversity net gain needs to be legally secured. This will include:

- A Habitat Management and Monitoring Plan;
- A legal agreement with a local planning authority (a section 106 agreement) or responsible body (a conservation covenant); and
- A commitment to maintain the BNG for at least 30 years.

7.1.2 **Off-site delivery** of BNG will always require either a S106 agreement or Conservation covenant.

7.1.3 Whereas **on-site,** only delivery of habitats considered **'Significant Enhancements'** may be secured though planning conditions or a S106 agreement.

7.1.4 LPAs and responsible bodies will not enter into an agreement if they do not think the landowner will meet their obligations.

7.1.5 Failure to comply with the **general biodiversity gain condition** by commencing development without approval of the Biodiversity Gain Plan will be a breach of planning control. Local planning authorities have a range of planning enforcement powers and have responsibility for taking whatever enforcement action may be necessary, in the public interest, in their area.

7.1.6 The Key in figure 6 below shows how BNG can be secured.

7.2 Registering Units

7.2.1 In the scenario that a 10% gain cannot be achieved on-site, biodiversity units can be purchased from a unit provider. For mandatory BNG these units purchased must be registered on the Natural England biodiversity gain sites register at the point of submitting the biodiversity gain plan.

7.2.2 Within the Biodiversity gain plan, it requires the 'Biodiversity gain site register reference number'.

7.2.3 Registering units can take a number of weeks, therefore this should be factored in when determining development time frames, as works cannot commence prior to the Biodiversity Gain Plan being approved by the LPA.

7.3 Role of the LPA – Monitoring

7.3.1 Monitoring delivery of BNG sits with whoever has made the legal agreement with the landowner/manager to secure delivery of the habitat, i.e. a LPA for planning obligations and conditions or the responsible body for conservation covenants.

7.3.2 Planning conditions will be used to secure significant on-site habitat enhancements which are required to be secured and maintained for at least 30 years. This will include monitoring and reporting arrangements.

7.3.3 Specific and proportionate monitoring requirements will be set as part of planning conditions and obligations to secure off-site and significant on-site habitat enhancements. This will be determined on a case-by-case basis.

7.3.4 There will be a monitoring fee associated with the S106 monitoring requirement which will need to cover the legal requirement of 30 years minimum. This will differ depending on the size and complexity of the proposed 'significant enhancements' on-site and/or habitats off-site. The monitoring is required to ensure the landowner meets their obligations.

7.3.5 Monitoring assessments will be carried out and provided to the enforcing body (responsible body or LPA) to ensure that habitat delivery is on track.

7.3.6 The frequency of the monitoring will be expected to reflect the complexity and the distinctiveness of the habitats proposed on-site.

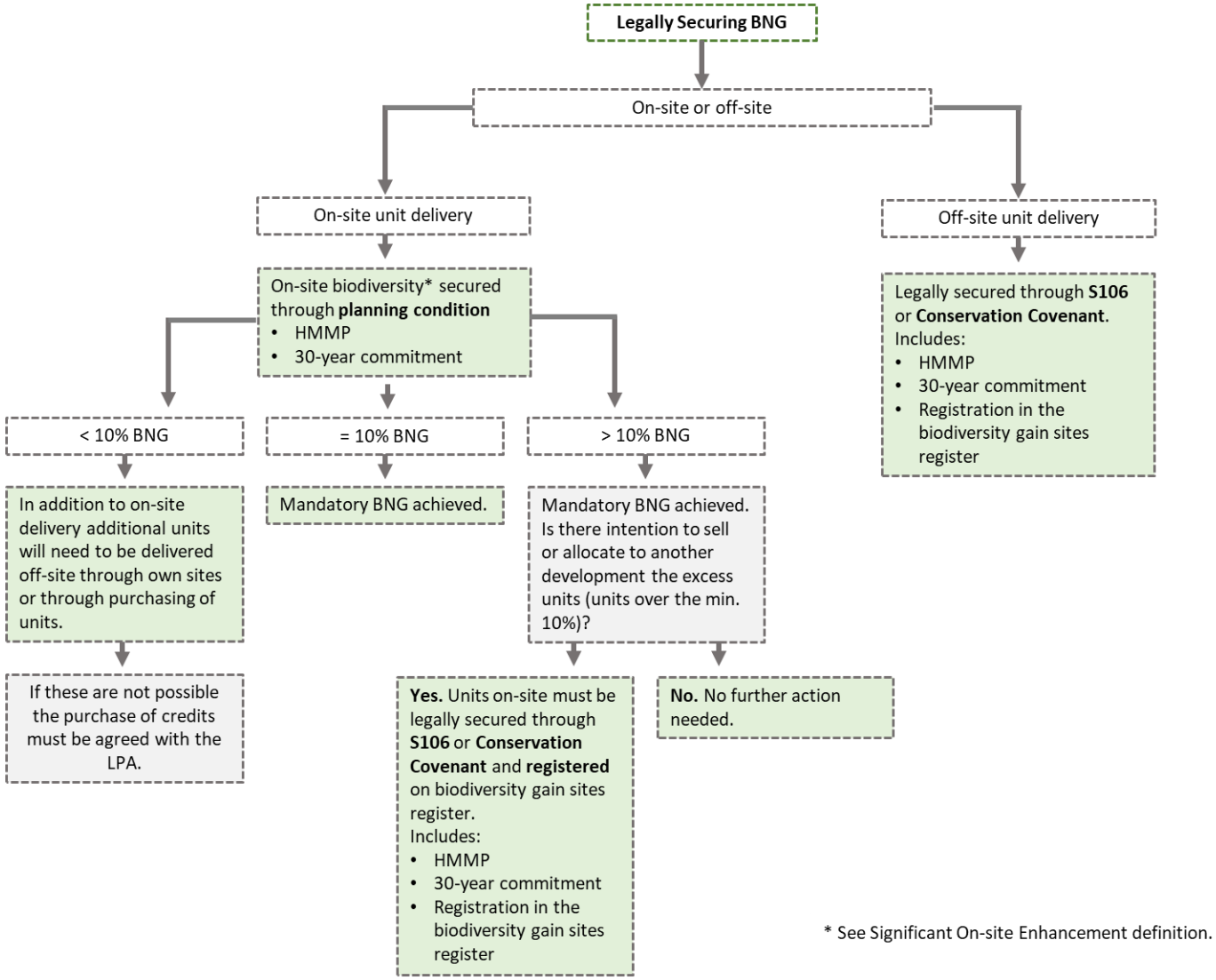


Figure 12: Diagram showing how BNG is legally secured.

8. SIGNIFICANT ON-SITE ENHANCEMENT

8.1 Legislation

8.1.1 **Paragraph 9 of Schedule 7A of the Town and Country Planning Act 1990** requires that where the planning authority considers that the increase in biodiversity value is significant in relation to the pre-development biodiversity value that the '**significant habitat enhancement'** must be subject to a planning condition, section 106 agreement, or conservation covenant.

8.2 Securing Significant On-site Enhancement

8.2.1 'Significant On-site Enhancement' will require protection through the construction phase, habitat creation, long-term implementation of management works and habitat monitoring. Significant On-site Biodiversity Net Gain will be secured through:

- **Construction Environmental Management Plan - Biodiversity (CEMP)** to protect any habitats or features stated as being retained or enhanced;
- **Habitat Management and Monitoring Plan (HMMP)** for a minimum of 30 years, to include management actions and monitoring to demonstrate delivery of biodiversity targets.
- **30-year commitment** to delivering biodiversity (from point of development completion).

8.3 What is Considered Significant On-site Enhancement

8.3.1 What is considered significant will depend on the existing habitats and the design and scale of the proposed development. Further guidance on the topic will be published in due course.

8.3.2 View more information about significant onsite gains.

9. WATERCOURSES

9.1 When to apply

9.1.1 Within Bristol, some of the watercourses, including the River Avon, are subject to subtidal estuarine reaches. The Water framework Directive (WFD) data sets shows the boundaries between riverine and subtidal estuarine reaches WFD Transitional and Coastal Waterbodies Cycle 2 - data.gov.uk.

9.1.2 The data identifies the transitional zones along the watercourses.

9.1.3 If the watercourse has sufficient riverine features to be able to successfully apply and carry out a River Condition Assessments then the delivery of 10% mandatory BNG will apply. There is guidance for consideration of tidal influences within the river assessment methodology.

9.1.4 If the site is located along the transitional zone and the river condition assessment is considered not applicable, please contact the LPA to discuss prior to submitting the BNG assessment without a river assessment.

9.2 Reporting

9.2.1 As part of the reporting for River Condition Assessments it will be expected that the following is included:

- Methodology;
- Map including watercourse and location of each of the survey points of the Morph field survey;
- Supporting photos from the survey carried out;
- Limitations;
- Details of the Desktop Reach Assessment, including final river type;
- Summary of Results, including reference to condition indices, preliminary condition scores, over deepening, and final condition;
- Opportunity for enhancement explored; and
- Raw data in the form of excel spreadsheets.

10. INFORMATION REQUIRED WITHIN APPLICATIONS

10.1 Overview

10.1.1 This chapter sets out the information that needs to be submitted for an application to be determined.

10.1.2 Section 10.3 below sets out the minimum data and documentation required as part of the planning application for developments requiring to achieve a biodiversity net gain. Please note, if the application does not include the documents below to the standards described there is a risk that the local planning authority will refuse to validate the application, or the application may be subject to delays from needing to request and receive the additional information.

10.2 Exemption

10.2.1 A clear statement as to why the application is exempt from mandatory BNG is required. This must include evidence to support the exemptions such as photos and aerial imagery. An Exemption Template Form is available.

10.2.2 In more complex scenarios this may require a BNG assessment and corresponding report and metric to demonstrate how the proposed development will be exempt.

10.2.3 If at the determination stage the development has changed to no longer be considered exempt it will be expected to deliver on the Biodiversity gain condition requirements. In that case, and provided the necessary documentation has been provided, the Biodiversity gain condition is applied to enable planning approval to be given.

10.3 Application

10.3.1 A new Planning Application Requirements Local List has been published to help guide applicants as to what is needed as part of the planning application for BNG.

10.3.2 The initial application (for applications which are subject to mandatory BNG) is expected to include the following:

- **Biodiversity Net gain Report** which will include:
  - Statement of the baseline biodiversity value on-site;
  - Justification (e.g. species list provided which supports the Habitat type allocated) and evidence (such as photos) for habitat type allocated to each habitat parcel within baseline;
  - Condition value of each habitat parcel within baseline, including condition criteria passed and failed with justification and evidence included;

- Provision of justification and, where required, evidence to support the target habitat types and condition within the post-development plan. Target habitats and condition values must be achievable, considering the environmental conditions and functionality of the proposed scheme. Where applicable, interdisciplinary input should be applied to ensure targets are achievable.
- Maps for both the pre- and post-development scenario using UK Habitat classification system as applied within the metric. The map must be able to be cross referenced with the report. The maps should be clear and readable, and where necessary hedgerow, river and area habitats presented separately.
- Details of how strategic significance has been applied.
- Description of how the Biodiversity Metric Principles and Biodiversity Gain Hierarchy have been applied; and
- Indication of how additional units, if required, will be achieved through off-site habitat provision, unit purchase or credit purchase.

- **Completed Statutory metric** (macro-disabled) which includes the baseline value and the post-development value based on the landscape plan submitted. The baseline value must reflect the Red Line Boundary submitted. The post-development assessment can be a draft at this stage.
- **BNG GIS Data**: GIS data will be welcomed at application stage. This will be expected to be provided as Shapefiles or GIS format where the information is usable within ArcGIS software. A QGIS template is made available by Natural England. The GIS data should reflect the Statutory Metric and BNG report including the following data for baseline and post development (as applicable):
  - Habitat Type and ideally supporting evidence for habitat applied including species list;
  - Condition including value, condition criteria passed/failed and ideally justification for each;
  - Strategic significance applied;
  - Area in hectares or km as appropriate;
  - ID reference number which corresponds to report and metric submitted; and
  - Version identification of the post-development shapefiles submitted, in order for any amendments or variations in design to be clearly identifiable.

10.3.3 An **Application Stage Checklist** has been provided.

10.4 Draft Documents

10.4.1 As part of the application a draft Habitat Management and Monitoring Plan (HMMP) ***can*** be submitted. This allows for early consideration in the planning process.

10.4.2 A HMMP will be required for any 'significant enhancements' on-site and any off-site BNG delivery. The management and monitoring proposed must reflect the information within the accompanying metric, and mapping, as well as be able to deliver habitat management for a minimum of 30 years following development completion.

10.4.3 A template for the HMMP is available from the DEFRA website: Habitat Management and Monitoring Plan Template - JP058 (naturalengland.org.uk). Note, at planning application stage the HMMP elements can be included within a LEMP or other document as long as all the elements included within the template are addressed, the document reflects the metric, and the HMMP elements have clear ecological input.

10.4.4 The final Biodiversity Gain Plan cannot be submitted prior to planning approval. However, we will accept submission of **draft** Biodiversity Gain Plans prior to determination of the planning application and purchase of any biodiversity units. This early submission of the information may assist in the later approval of the biodiversity gain plan which is a pre-commencement condition and allow any issues to be resolved early in the process.

10.4.5 The document must be labelled as draft and will require the information stated within Section 10.5, except that the units will not expect to be registered at this stage.

10.5 Biodiversity Gain Plan Submission

10.5.1 A Biodiversity Gain Plan will need to be submitted to the local planning authority, following planning permission being granted. The Biodiversity Gain Plan template can be found on the DEFRA website.

10.5.2 The Biodiversity Gain Plan must provide proof of competency of the person completing the BNG metric and Biodiversity Gain Plan.

10.5.3 In addition to the Biodiversity Gain Plan, the final version of supporting documents should also be submitted as necessary.

10.5.4 With the submission of the biodiversity gain plan, the following will be expected:

- Completed statutory biodiversity metric calculation;
- **Pre-development and post-development plans** (showing the location of on-site habitat, the direction of north and drawn to an identified scale);
- A **compensation plan** if the development impacts irreplaceable habitats;
- Biodiversity net gain **register reference numbers** if purchasing off-site units;
- **Proof of purchase** if purchasing statutory biodiversity credits; and
- **Final versions of all supporting documents** (Habitat Management and Monitoring Plans, Metrics, and reports) must accurately reflect the Biodiversity Gain Plan submitted.
- **GIS information** (provided as shapefiles or similar) will also be expected to be submitted in order to assist in the 30-year management and monitoring of on-site and any off-site habitat delivery.

10.5.5 All information provided must align and be consistent. These documents will be referenced over the next 30 years following completion of the development, therefore, any discrepancies that are considered significant enough to not reflect the unit delivery agreed will need to be addressed before the biodiversity gain plan can be approved. This may delay the process of gaining planning condition discharge approval.

10.5.6 Provided all required documentation is provided on submission of the biodiversity gain plan, BCC will carry out a review within 8 weeks of receipt. On approval of the biodiversity gain plan, work can commence on the development (subject to any other pre-commencement conditions). Without approval of the plan, no work can commence.

10.5.7 We will accept and recommend submitting a **DRAFT Biodiversity Gain Plan** prior to purchasing units as part of the planning application (see Section 10.4).

10.5.8 A **Biodiversity Gain Plan Submission Checklist** is provided.

10.6 Additional Considerations

10.6.1 Evidence proportionate to the proposed habitat type and condition is required to support all habitat delivery.

10.6.2 Environmental evidence will be expected to support the delivery of high or very high distinctiveness habitats. For example, if enhancement from modified grassland to lowland meadow or calcareous grassland was proposed. This could include:

- Soil sampling showing nutrient levels and pH
- Supporting hydrological information to support the successful delivery of habitats such as wet woodland, reed beds etc.

10.6.3 Target habitats and conditions must be achievable within 30 years to be able to count towards BNG delivery. Carrying out environmental assessments, such as soil sampling, can be used to inform design and future management requirements, as well as support the achievability of a target habitat type and condition value.

11. LEGISLATION, POLICIES AND STRATEGIES

11.1 Overview

11.1.1 As part of a wider Government strategy to address the biodiversity decline in England a requirement for developments to demonstrate a minimum 10% net gain in biodiversity following development has been mandatory from the 12th February 2024 for major projects, and for small sites since the 2nd April 2024. This gain in biodiversity will need to be secured for a minimum of 30 years.

11.1.2 **The Environment Act (2021)** introduced a mandatory requirement for developments which require planning permission to achieve a minimum 10% net gain in biodiversity.

11.1.3 In England, biodiversity net gain is required under a statutory framework introduced by **Schedule 7A of the Town and Country Planning Act 1990** (inserted by the Environment Act 2021).

11.1.4 **The Environmental Improvement Plan** (EIP) for England builds on the initial government 25 Year Environment Plan set out in 2018. The BNG approach supports the targets outlined within the EIP, which also references BNG as part of its strategy to further deliver on the Global Biodiversity Framework agreed at UN Nature Summit COP15 which includes the delivery of 30% of global land and 30% of global ocean to be protected by 2030.

11.1.5 **Bristol's emerging new Local Plan** was published prior to examination in November 2023. Both the current and emerging local policy reflects the importance of biodiversity delivery within Bristol City.

11.2 Legislative Framework

11.2.1 The Environment Bill received Royal Assent on 9th November 2021. The Environment Act 2021 makes provision for the introduction of 10% mandatory Biodiversity Net Gain to ensure developments covered by the Town & Country Planning Act (TCPA) deliver an increase in biodiversity value post development. The Act also introduced a statutory requirement for Local Nature Recovery Strategies (LNRSs) to be produced by a responsible authority appointed by the Government (in Bristol's case the West of England Combined Authority is the responsible authority). LNRSs support the Nature Recovery Network as a spatial plan to protect and restore wildlife. The Environment Act also makes provision for strengthening the Biodiversity Duty for Local Authorities.

11.2.2 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Section 90A and Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the Act by Schedule 14 of the Environment Act 2021 and includes amendments

made by the Levelling Up and Regeneration Act 2023 and the Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations [2024].

11.2.3 The relevant biodiversity net gain regulations most directly relevant to planning are:

- **The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations [2024]** which commence biodiversity net gain for most types of new planning applications and provides transitional arrangements for section 73 permissions.
- **The Biodiversity Gain Requirements (Exemptions) Regulations [2024]** which prescribe exemptions for categories of development to which biodiversity net gain does not apply.
- **The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations [2024]** These regulations make further consequential amendments to existing primary legislation on planning, to integrate the BNG framework. These amendments include the definition of a planning authority under Schedule 7A which sets out the BNG framework.
- **The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations [2024]** which amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions related to planning applications and the Biodiversity Gain Plan, as well as modifications for phased development.
- **The Biodiversity Gain Requirements (Irreplaceable Habitat)** Regulations [2024] which set out the modifications for irreplaceable habitat.
- **The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations [2024]** which allow for fees to be charged for applications to register land in the biodiversity gain site register and allows the register operator (Natural England) to issue financial penalties where false or misleading information is provided.

General condition of planning permission

> "*13 (1) Every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition in sub-paragraph (2).*
>
> *(2) The condition is that the development may not be begun unless—*
>
> *(a) a biodiversity gain plan has been submitted to the planning authority (see paragraph 14), and*
>
> *(b) the planning authority has approved the plan (see paragraph 15).*"

11.2.4 In addition to the above, there is further legislation pertaining to the protection of habitats and species. The requirements to deliver biodiversity net gain does not replace or supersede the statutory protection afforded under national legislation for these habitats or species. An Ecological Impact Assessment (EcIA) is likely to be required alongside a BNG assessment to determine the risk of ecological impacts.

11.3 National planning policy

11.3.1 **The National Planning Policy Framework (NPPF)** (updated December 2024) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans can provide for sufficient housing and other development in a sustainable manner. This framework includes how applications for planning permission are to be determined in relation to biodiversity.

11.3.2 Section 15, paragraph 193 of the NPPF directly relates to biodiversity provision within developments.

> *193. When determining planning applications, local planning authorities should apply the following principles:*
>
> a. *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
> b. *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
> c. *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused,*

unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

11.3.3 **National Planning Practice Guidance (NPPG)** on the Natural Environment (Paras 10–35) details the responsibilities regarding Protected and Priority Species and Habitats; and the 'proportionate' information and assessment required on biodiversity impacts at all stages of development. It also advises on the restoration or enhancement of local ecological networks, including those that contribute to the wider Nature Recovery Network, the application of the mitigation hierarchy, net gain metrics, and promotion of woodlands.

11.4 Local planning policy (emerging 2023 Local Plan)

11.4.1 The emerging Local Plan was published in November 2023. The emerging policies should be considered alongside the current adopted Local Plan until the new Local Plan is adopted.

11.4.2 The emerging Local Plan at the time of writing was undergoing examination. For the latest information please visit: **Local plan examination.**

11.4.3 There are a number of policies which will be relevant to Biodiversity Net Gain within the emerging Local Plan. This document will be updated to reference these policies once the new Local Plan has been adopted.

11.5 Local Strategies

11.5.1 Bristol has a number of current and emerging strategies which should be considered alongside the delivery of BNG.

- The **Parks and Greenspaces Strategy (PGSS)** 2023 sets out a vision for Bristol's Parks and Green Spaces over the next 15 years to 2039. The Parks and Green Spaces Strategy includes green spaces that are managed by the council's Parks Service and land that is open to the general public to use for recreation. The Parks and Green Spaces Strategy identifies key actions to ensure that the city's parks and green spaces continue to contribute to people's health and wellbeing, respond to the ecological and climate emergencies and provide greater opportunities to grow food.
- Within the **One City Ecological Emergency Strategy** Bristol outlines a clear direction in line with the One City Plan and the Sustainable Development Goals, and provides a blueprint for organisations, individuals and communities to define their own action plans to support nature's recovery. BNG can help deliver on the key strategic goals including making 'Space for nature'.
- Within the **One City Climate Strategy** Bristol is committed to becoming carbon neutral and climate resilient by 2030. This can be supported through the delivery of BNG by reducing the impact development delivery has on releasing carbon, for example removal of trees. As well as considering climate resilience within the design, by including nature-based solutions such as sustainable urban drainage, and inclusion of trees for shade. The following objectives directly relate to BNG:

  2030 Objective (i) All new developments use appropriate blue and green infrastructure to protect from future climate events whilst also providing ecological net gain and enhancing the sequestration potential of all developments; and

  2030 Objective (ii) The city's natural environment (including canopy cover and biodiversity) has been restored, preserved and enhanced to maximise carbon sequestration in carbon sinks, climate resilience and health and wellbeing.
- The **Bristol Tree and Woodland Strategy** states, "*The declarations of climate and ecological emergencies in Bristol highlight the urgent need to increase tree and woodland cover to mitigate and adapt to the impacts of climate change and restore nature*".

12. INDIVIDUAL TREES

12.1 Trees within Bristol

12.1.1 Trees play an important role within Bristol, delivering a number of ecosystem services across the city, including climate change adaptation of our public spaces through the provision of shade and flood mitigation. Policy BG4 within the emerging Local Plan includes a **tree compensation standard**.

12.1.2 Both the tree compensation standard and BNG requirement must be met. It is strongly recommended that any biodiversity value lost via felling of individual trees should be replaced with further individual tree planting rather than though delivery of other higher distinctiveness habitat types as permitted by the trading rules.

12.1.3 The emerging Local Plan states "*Where the tree compensation standard is not already met in full by biodiversity net gain requirements (policy BG3 'Achieving biodiversity gains'), for instance because biodiversity net gain requirements do not apply to the development or because biodiversity gains are provided through a different habitat type, development will still be expected to meet the tree compensation standard on-site or off-site through an appropriate legal agreement*."

12.1.4 This approach also ensures that the tree compensation standard can be met as well as the BNG requirement.

12.1.5 In the scenario that the biodiversity units lost through the felling of trees are met by providing higher distinctiveness habitat such as lowland mixed deciduous woodland (high distinctiveness) the Policy BG4 tree compensation standard would still need to be met.

12.2 Tree loss on-site

12.2.1 Any loss, directly or indirectly, related to a proposed development (this includes consideration of trees impacted outside of the red line boundary) which will be impacted by the proposed development will need to be justified to support why this could not be avoided. This is required to ensure compliance with the Biodiversity Gain Hierarchy.

12.3 Assessing Individual Trees within the Metric

12.3.1 Within the baseline assessment, trees of medium size or larger within private gardens must be recorded as individual trees rather than included as vegetated garden within the baseline.

12.3.2 Delivery of trees within private gardens are welcomed, as they can contribute to climate adaptation within the landscape, food opportunities and benefits to wildlife. However, because these trees are under private ownership and cannot be secured

for 30 years, the biodiversity value of the trees cannot be included within the post-development assessment.

12.3.3 Each individual tree requires a **separate condition assessment**, unless found within an urban line, urban block or urban group.

12.3.4 Any tree planting should be recorded in the **post-development assessment** as **small in size** within the Statutory Metric. The Statutory User Guidance states "*record newly planted individual trees as 'small', unless 'medium' size or above **at the time of site-planting***." Sizes larger than small can only be applied if sufficient justification is provided and agreed with the planning ecologist.

12.4 Maximising biodiversity unit and long-term delivery

12.4.1 **There is potential for more units to be delivered through the planting of native species** as one of the condition criteria within the condition assessment is "*The Tree is a native species*". Native species, ideally of **local provenance**, is preferred due to the benefits to the wildlife which have adapted to them. To increase resilience a diverse range of species and genetic diversity should be chosen. Diversity in a landscape will increase potential resilience to pests, diseases and climate change.

12.4.2 Biodiversity units can still be gained from delivering tree species which are considered 'non-native' or 'cultivars', however, consideration should be made to climate change and choosing the 'right tree for the right place' to support longevity.

12.4.3 **Connectivity** within the landscape should be considered. Where possible the canopy and soil network of trees should be connected.

12.4.4 One of the condition criteria that determines the unit delivery of individual trees is if the tree is **oversailing vegetation**. Therefore, individual trees have the potential to deliver more units if planted over grassland or shrubs.

12.4.5 Another one of the condition criteria is "*there is no current regular pruning regime, so the trees retain >75% of expected canopy cover for their age and height*". As a result, the **choice of tree species, location and future management requirement** should be considered as part of the design process to enable opportunity to maximise biodiversity units gained from individual tree delivery on-site.

12.5 Trees in planters

12.5.1 Trees proposed within planters will not be considered as individual trees, unless sufficient evidence and justification is included within the application as to how the tree will achieve longevity within the planter. Trees delivered in planters are often not expected to survive 30 years, therefore, any trees planted will need to be delivered with the intention that the trees will survive 30 years and beyond.

12.5.2 Trees in planters should be included as habitat type 'ground level planters'.

12.6 Reaching Maturity at 30 years

12.6.1 Tree maturity is considered to have been achieved when 2/3 of the full height and crown size has been reached.

12.6.2 It is not considered appropriate to assign a pass for the condition criteria "C – the tree is mature" for newly planted trees for the following reasons:

- Within Bristol we want to encourage long-lived trees which will be a significant part of the landscape;
- Within urban environments, trees can be stunted in growth, therefore, under an increased risk of not reaching a mature size by year 30; and
- During the management and monitoring of the habitats created there is risk of individual tree loss. These trees will be expected to be replaced, however, this would likely provide insufficient time for the tree to reach maturity and pass the 6condition criteria.

12.6.3 The habitat proposed within the post-development plan must be considered achievable within the time frame and consider the risks involved with the location and function of the space.

12.6.4 If habitats of greater condition or habitat distinctiveness are achieved (while meeting the trading rules) these biodiversity units can be secured and used to deliver units for other projects.

12.7 When to use 'Line of Trees'

12.7.1 Line of trees applies to rural landscapes only. Within urban environments trees in a line, such as along a boundary are considered area habitats rather than linear habitats. As a result trees in an urban environment will need to be calculated as 'individual trees'.

12.7.2 The exception would be if these lines of trees were included within a hedgerow, in which case 'Native hedgerow with trees' or 'Species-rich Native hedgerow with trees' would be considered the most appropriate habitat type to apply.

12.7.3 This is specifically set out at p53 of the statutory guidance for reference: "Do not use the hedgerow module classifications 'line of trees' and 'ecologically valuable line of trees' to record linear formations of trees in the urban environment. These classifications should only be used for rural lines of trees."

13. GUIDANCE FOR ACHIEVING BNG

13.1.1 Biodiversity Net Gain should be considered from the site selection stage to the final design in order to maximise effective delivery of the mandatory 10% gain.

13.1.2 Below are a number of approaches that will help reduce costs related to BNG delivery while maximising benefit to biodiversity.

13.1.3 These include:

1. Site Selection
2. Red Line Boundary and Development Footprint
3. Clearance Consideration
4. Management costs
5. Retention and Enhancement
6. Feasibility and Design Drivers
7. Off-Site Delivery

13.2 Site Selection

13.2.1 By utilising biodiversity assessments in the very early stages of development, the biodiversity value can be taken into consideration during site selection.

13.2.2 A high-level desk-based assessment of the sites under consideration has the potential to flag any sites with a **high biodiversity baseline**, which should be **avoided**, and any sites with **low biodiversity baseline**, which have the **greatest opportunity** in terms of biodiversity delivery post-development.

13.2.3 It also has the added benefit of avoidance of any land considered agriculturally productive and any registered irreplaceable habitat such as ancient woodland.

13.2.4 High-level desk-based assessment should be carried out by professional ecologists and typically use aerial imagery and mapping databases such as MAGIC to determine the likely habitat coverage and early rough baseline biodiversity value of the site.

13.2.5 This initial step can help avoid the sites with high biodiversity value which will come at a greater cost to develop compared to those sites with low biodiversity.

13.2.6 For example, a site comprising 1ha of **other neutral grassland** (in this scenario in poor condition) will have a baseline value of **4.0 biodiversity units** and therefore a requirement for a net biodiversity delivery of **4.4 biodiversity units**. In comparison, a site with 1ha of **modified grassland** will only have a baseline of **2.0 biodiversity units**, and therefore a net biodiversity delivery of **2.2 biodiversity units**.

13.2.7 In the scenario that the net gain cannot be achieved on-site or through offsetting, statutory credits will need to be purchased. Note that due to the spatial risk multiplier applied to statutory credits to ensure statutory credits do not compete with the development of the off-site market and remain a last resort**, 2 statutory credits must be purchased for every 1 biodiversity unit required**.

13.2.8 By considering the baseline value at an early-stage costs later down the line can be avoided and sites of high biodiversity value can be utilised as green assets with the potential to be used as offsetting sites.

13.3 Red Line Boundary and Development Footprint

13.3.1 Similar to the above, when the Site is chosen, qualified ecologists will need to carry out an assessment of the site. **A biodiversity baseline assessment** should be requested and carried out alongside other ecological surveys such as Preliminary Ecological Appraisals (PEAs), and Ecological Impact Assessments (EcIA).

13.3.2 A biodiversity baseline assessment should include a report which identifies the habitat coverage, condition, size of the parcels and strategic significance and presents the baseline value in a map. In addition to the report document a metric and GIS data should be provided. See example below.

Parcel Ref	1
Location	(On-site)
Baseline Broad Habitat Type	Cropland
Baseline Habitat Type	Cereal crops
Baseline Condition	Condition Assessment N/A
Baseline Strategic Significance	Area/compensation not in local strategy/ no local strategy

Figure 13: Example of GIS data included within polygons. Example taken from QGIS.

13.3.3 On request the ecological consultancy should be able to apply a **heat or RAG biodiversity map** which can be used to identify habitats of highest and lowest value within a Site.

Heat Map Example

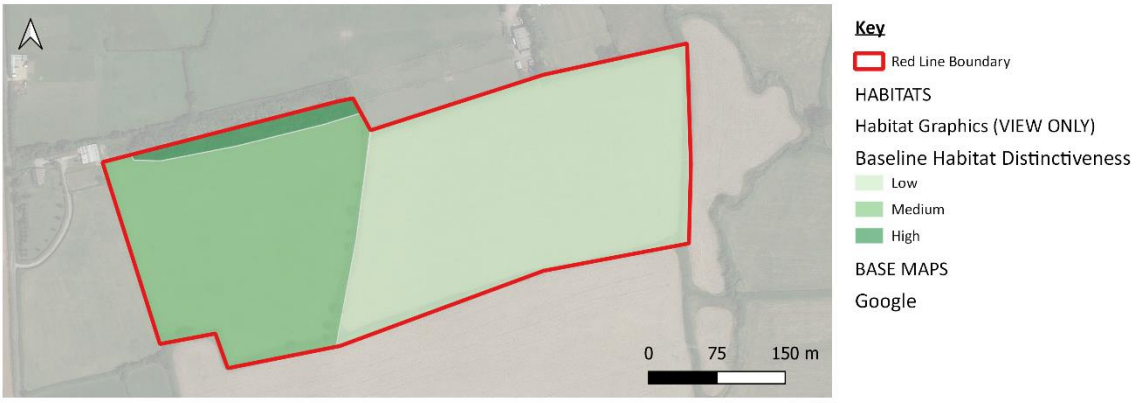


Figure 14: Heat map whereby the higher value habitats (e.g. representing distinctiveness) identified with a darker colour.

13.3.4 This principle is most effectively applied prior to any plans as the information can then be used to inform the location and extent of the red line boundary and development footprint.

13.3.5 As with the first approach, by targeting habitats of lower value it provides an opportunity to retain and enhance habitats of higher value. Ultimately ensuring the costs are minimised by reducing the units needing to be replaced and providing opportunity in gaining those units through enhancements of retained habitats.

13.3.6 For example, by targeting modified grassland over an area of other neutral grassland which is of higher distinctiveness fewer biodiversity units are lost and therefore less units need to be replaced.

13.3.7 The Heat or RAG map can also be used to adjust the red line boundary as needed to avoid areas of high biodiversity value. Habitats of high distinctiveness will increase the baseline of the Site. If these parcels of habitat are not needed to achieve the proposed project or if the design can be adapted to not require these areas this will reduce the baseline biodiversity value and as a result the 10% gain required. (For example, a baseline value of 20 units will require to deliver 22 units, whereas a baseline of 15 units will only require to deliver 16.5 biodiversity units to achieve 10% gain).

13.3.8 Initially a larger survey boundary (blue line) should be requested to provide options and flexibility to adjust the design to avoid key habitats and additional cost.

13.3.9 There may be opportunity to include the area outside the red line boundary (which will not be impacted or become part of the development) as offsetting provision through habitat enhancement or creation.

13.4 Clearance Consideration

13.4.1 Vegetation clearance needs to be carefully considered as it will be reflected within the metric calculation as lost habitat.

13.4.2 An exemption to this is the clearance of habitat which can and will be restored within two years of the initial habitat loss, to the same habitat type and condition. This is considered a temporary loss and can be inputted as retained within the metric calculations. An example would be modified grassland which has been subject to temporary soil storage, which is a habitat able to be easily and quickly restored (DEFRA, 2024).

13.4.3 Therefore, in order to minimise any unnecessary loss in units and subsequent costs the following should be considered:

- Clearing only the **minimum** required;
- If clearance is required for temporary storage of materials, soil or as a site compound then consider options which **target habitats of less value** (with inclusion of wider considerations within the EcIA);
- Consider the impact and actual scope of the clearance proposed, for example if the vegetation clearance removes trees which have sheltered the ones behind which will have had their root zone impacted and will be subject to the elements, consider the likelihood of those trees surviving as a result of that clearance and have it reflected within the metric;
- Have a **realistic clearance area**. It will be more difficult to rectify the loss of additional habitat and subsequent biodiversity units lost during the development process compared to gaining additional units through the reduction of the clearance area;
- Take into consideration if the clearance perimeter will be able to be **accurately applied on-site** by the vegetation clearance team;
- Within complex or large projects this may be facilitated through the bringing together of a **multidisciplinary team** which comprises ecologist, landscape architect, engineer etc. to ensure the approach is informed and the best available approach; and
- Have a format for the clearance data such as in **GIS data** that can easily be measured, shared and communicated.

13.4.4 It is expected that these considerations are presented with justification within any reports produced. Inclusion of these points has the potential to reduce the risk of unnecessary costs to the project or habitats present on the Site.

13.5 Management costs

13.5.1 Traditional site management can come at a greater cost compared to management of habitats for wildlife.

13.5.2 For example, rather than mowing grassland frequently to a short sward, once established, grassland can be mown once a year in the late summer/early autumn.

13.5.3 Public understanding of a “messier” landscape and its benefits to wildlife has increased and can be further supported with community involvement and use of information boards to educate on the benefits of a varied sward height within a grassland, the retention of deadwood and hedgerows with a staggered cutting regime.

13.6 Retention and Enhancement

13.6.1 Retention of habitats ensures there is no unnecessary loss in units which would need to be mitigated for on-site or purchased for off-site provision.

13.6.2 Enhancement is a good opportunity to gain units due to the fact there is no loss of units, compared to most scenarios of habitat creation. The net units delivered for habitat creation will need to subtract the baseline units lost as a result of the new habitats being created. E.g. 1ha of modified grassland = 2 units, and on the same land broadleaved woodland is created which has a value of 3.35 units. The increase in value achieved is 1.35units. For enhanced habitats there is no initial loss in biodiversity value.

13.6.3 Retention and enhancement can also benefit the development by adding value beyond BNG. Created habitat takes time to establish, whereas habitat such as mature woodland, trees or other neutral grassland contribute to an established landscape and associated ecosystem services such as air quality and wellbeing. In particular, woodland takes decades to reach maturity, and by retaining these habitats on-site it ensures immediate benefit to wildlife and local people.

13.7 Feasibility and Design Drivers

13.7.1 As part of the planning application consideration, the feasibility of the proposed scheme will be taken into consideration. It is important that a number of factors are considered when proposing habitats, particularly on-site which will likely be under population pressures.

13.7.2 Below are a few considerations, some of which will require justification and evidence within the application:

- The habitats must be feasible, such as delivering one 'jump' in condition e.g. poor to moderate, moderate to good, unless this can be sufficiently supported with evidence and expertise.
- Are the habitats proposed adjacent to cropland which is subject to pesticides, herbicides and fertilisers? Looking at the topography, is there a risk that these chemical inputs will impact the neighbouring site? There will need to be justification and evidence to support the delivery of habitats such as other neutral grassland in good condition or lowland meadow delivery in these circumstances where the nutrient levels are likely to be high and subject to future input.
- Is it the right habitat and right species for the right location? Choosing habitats and species that are suitable for the climate, topography, hydrology, soil pH and site use is important. The delivery of habitats in unsuitable conditions will result in the need for greater intervention and subsequent cost, as well as risk not delivering on BNG requirements.
- Consideration of the use of the Site should be reflected in the habitats proposed within the on-site landscape plan. The habitats delivered may be unlikely to achieve good condition if they are subject to heavy use by people. Equally, the development of residential areas usually brings cats and dogs which can impact local wildlife and habitats.
- The delivery of on-site habitats considered 'significant enhancement' will be subject to a S106 agreement. Applicants need to be realistic in what is deliverable on-site, as there will be penalties for failure to deliver the agreed target biodiversity units.

13.8 Off-site delivery

13.8.1 Where BNG cannot be achieved on-site, the next option is delivering units off-site.

13.8.2 The **spatial risk multiplier** adds a penalty depending on the distance between the development site (impact site) and the site where biodiversity is being delivered (See Figure 15). It is more cost effective to deliver within the same LPA or National Character Area of the development site as no penalty is applied.

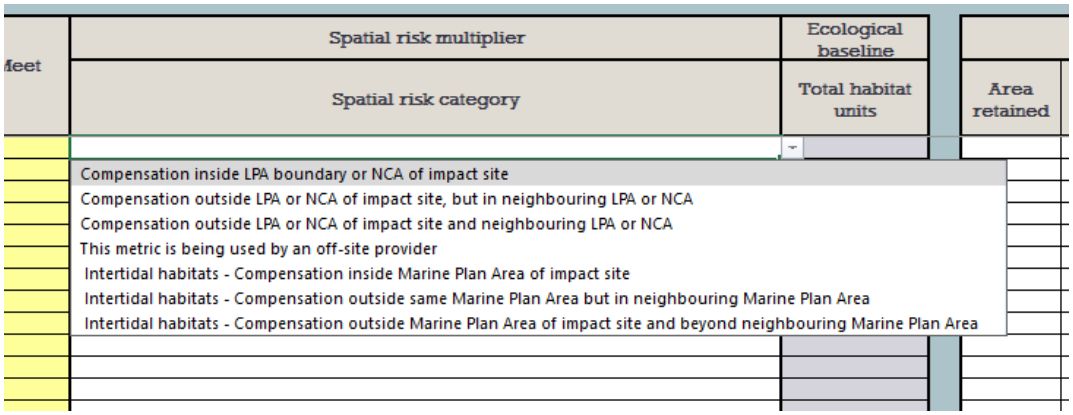


Figure 15: The Spatial risk multiplier is automatically applied based on the category inputted within the 'off-site' tab of the Metric.

13.8.3 Exceptions are **intertidal habitats** which are subject to the Marine Plan Areas, where penalties apply for delivery outside the Marine Plan Area of the impact site but within the neighbouring Marine Plan Area, with greater penalties applying to off-site biodiversity delivery outside both the Marine Plan Area of the Impact site and the neighbouring Marine Plan Area.

13.8.4 Similarly, **watercourses** also apply the spatial risk differently, whereby penalties are applied outside waterbody catchment, but within operational catchment, with greater penalty applied if the off-site delivery is outside the operational catchment.

13.8.5 Ideally the off-site BNG biodiversity delivery would be as close as possible to the impact site (red line boundary) in order to avoid a biodiversity drain in that area.

13.8.6 Biodiversity units can be purchased, or delivered on separately owned land. There are a number of platforms emerging to facilitate this.

13.8.7 Another option would be to use existing land owned or purchase additional land close to the development (impact site) for off-site biodiversity delivery. The biodiversity delivery would need to be secured with a conservation covenant or S106 agreement and registered on the national biodiversity gain sites register. Further information on delivering biodiversity gain sites can be found here.

13.8.8 Depending on the size and opportunity of the offsetting site, this option has the potential to deliver the specific habitats required to offset the developments and bank any additional units for other developments.

14. Resources

Table 4: List of Resources

Topic	Reference Link
Make on-site biodiversity gains as a developer	Make on-site biodiversity gains as a developer - GOV.UK (www.gov.uk)
Biodiversity net gain. Good practice principles for development A practical guide.	Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide. | CIEEM
User Guidance and metric	Statutory biodiversity metric tools and guides - GOV.UK (www.gov.uk)
Process for designing and implementing biodiversity net gain (BS 8683:202).	Process for designing and implementing biodiversity net gain (BS 8683:202)
User Guidance and metric	The Small Sites Metric - JP040 (naturalengland.org.uk)
UK Habitat Classification Guidance	ukhab – UK Habitat Classification
Biodiversity Net Gain Report and Audit Templates	Biodiversity Net Gain Report and Audit Templates | CIEEM
Natural England QGIS Template and Guidance	The Biodiversity Metric Supporting Documents - JP039 (naturalengland.org.uk)
HMMP Template	Habitat Management and Monitoring Plan Template - JP055 (naturalengland.org.uk)
Trees in Hard Landscapes A Guide for Delivery	Trees in Hard Landscapes: A Guide for Delivery - Trees and Design Action Group (tdag.org.uk)
Urban Tree Manual	Urban Tree Manual - Forest Research
LNRS Habitat Map	LNRS Local Habitat Map
National Planning Policy Framework 2023	National Planning Policy Framework - Guidance - GOV.UK (www.gov.uk)

National Design Guide and National Model Design Code	National Model Design Code - GOV.UK (www.gov.uk)
Environment Act 2021	Environment Act 2021 (legislation.gov.uk)
Environmental Improvement Plan 2023	Environmental Improvement Plan 2023 - GOV.UK (www.gov.uk)
Bristol Local Plan (2011)	Local plan (bristol.gov.uk)
Bristol Local Plan (2023)	Local plan review (bristol.gov.uk)

15. References

Bristol City Council , 2023. *Bristol Local Plan ,* Bristol: BCC.

Buckinghamshire Council, 2023. *Interim Strategic Significance & Spatial Risk Guidance for Biodiversity Net Gain in Buckinghamshire Council's Local Planning Authority Area,* Buckinghamshire: Buckinghamshire Council.

DEFRA, 2023. *Combining environmental payments: biodiversity net gain (BNG) and nutrient mitigation.* [Online] Available at: https://www.gov.uk/guidance/combining-environmental-payments-biodiversity-net-gain-bng-and-nutrient-mitigation

DEFRA, 2024. *The Statutory Biodiversity Metric User Guide.* s.l.:DEFRA.

DLUHC, 2023. *Draft biodiversity net gain planning practice guidance.* [Online] Available at: https://www.gov.uk/guidance/draft-biodiversity-net-gain-planning-practice-guidance

DLUHC, 2023. *National Planning Policy Framework.* [Online] Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2

Dover, J. W., 2015. *Green Infrastructure Incorporating plants and enhancing biodiversity in buildings and urban environments.* New York: Routledge.

Mihalakakou, G. et al., 2023. Green roofs as a nature-based solution for improving urban sustainability: Progress and perspectives. *Renewable and Sustainanle Energy Reviews ,* Volume 180.

Shafique, M., Luo , X. & Zuo, J., 2020. Photovoltaic-green roofs: A review of benefits, limitations, and trends. *Solar energy,* Volume 202, pp. 485-497.

16. Checklist

16.1 Application Stage Checklist

Biodiversity Net Gain Report which includes:

- ☐ Statement of the baseline biodiversity value on-site;
- ☐ Methodology applied;
- ☐ Results of Baseline biodiversity Assessment. Including justification for Habitat Types allocated (e.g. species list provided which supports the Habitat type allocated).
- ☐ Condition value of each habitat parcel within baseline, including condition criteria passed and failed with justification and evidence included;
- ☐ Results of Post-development Assessment including target habitat types and condition which reflect the plans submitted.
- ☐ Maps for both the pre- and post-development scenario using UK Habitat classification system (preferably the version of UK Hab as applied within the metric. The map must be able to be cross referenced with the report. The maps should be clear and readable, and where necessary hedgerow, river and area habitats presented separately.
- ☐ Photos to support baseline assessment
- ☐ Details of how strategic significance has been applied.
- ☐ Description of how the Biodiversity Metric Principles and Biodiversity Gain Hierarchy have been applied; and
- ☐ Indication of how additional units, if required, will be achieved through off-site habitat provision, unit purchase or credit purchase.

Completed Statutory Metric which includes:

- ☐ Completed Start Page
- ☐ Data inputted reflects the latest plans submitted and the corresponding BNG report
- ☐ Use of Habitat reference column and User comments to support clarity

16.2 Biodiversity Gain Plan Checklist

Submitted documents to discharge the Biodiversity Gain Condition will be expected to include:

- ☐ Completed statutory biodiversity metric calculation;
- ☐ Pre-development and post-development plans (showing the location of on-site habitat, the direction of north and drawn to an identified scale);
- ☐ A compensation plan if the development impacts irreplaceable habitats;
- ☐ Biodiversity net gain register reference numbers if purchasing off-site units;
- ☐ Proof of purchase if purchasing statutory biodiversity credits; and
- ☐ Final versions of all supporting documents (Habitat Management and Monitoring Plans, Metrics, and reports) must accurately reflect the Biodiversity Gain Plan submitted.
- ☐ GIS information (shapefiles or similar) will also be expected to be submitted in order to assist in the 30-year management and monitoring of on-site and any off-site habitat delivery.

We will accept and recommend submitting a DRAFT Biodiversity Gain Plan prior to purchasing units as part of the planning application (see Section 10.4).