



# **Biodiversity Net Gain Interim Guidance**

## **Technical Advice Note**

---

**January 2022**  
**SOUTH DOWNS LOCAL PLAN**



# CONTENTS

---

CONTENTS .....	2
I. INTRODUCTION .....	3
What is Biodiversity Net Gain? .....	3
Purpose of this Technical Advice Note .....	3
2. BIODIVERSITY NET GAIN REQUIREMENTS FOR DEVELOPMENT PROPOSALS .....	4
Scope of the Biodiversity Net Gain Requirements .....	4
Is BNG required now?.....	4
How much BNG and how is this expected to be measured?.....	4
What types of development do the BNG requirements apply to? .....	4
Outline applications .....	5
Location of BNG provision.....	6
What is required to support a planning application?.....	6
About the Biodiversity Metrics .....	7
A meaningful contribution to Nature Recovery.....	10
Existing biodiversity protections and best practice principles still apply .....	10
A landscape-led approach to Biodiversity Net Gain.....	11
Appendix – The BNG Checklist .....	14

# I. INTRODUCTION

---

## What is Biodiversity Net Gain?

- 1.1 Biodiversity Net Gain (BNG) is an approach to development and associated land management that aims to leave biodiversity in a measurably better state than before. The Government made it a mandatory requirement for all development to achieve a 10% net gain for biodiversity through the Environment Act; the regulations on this are due to be consulted on in 2022.

“Biodiversity Net Gain is an approach to development which leaves biodiversity in a better state than before”

*Chartered Institute of Ecology and Environmental Management (CIEEM)*

## Purpose of this Technical Advice Note

- 1.2 The purpose of this Technical Advice Note (TAN) is to provide interim guidance for applicants and decision makers on how BNG is to be achieved in the South Downs National Park now in accordance with existing South Downs Local Plan Policy. It also provides guidance on how BNG is expected to make a meaningful contribution to nature recovery.
- 1.3 It supports the implementation of the South Downs Local Plan, in particular **Strategic Policy SD9 Biodiversity and Geodiversity**. It also builds on the requirements of the National Planning Policy Framework (NPPF) and draws on guidance from Natural England, the Chartered Institute CIEEM and principles in the Environment Act.
- 1.4 This is interim guidance ahead of the full suite of requirements for legally mandatory BNG which is expected to be a requirement following a two-year transition period ending winter 2023.
- 1.5 This interim guidance will be subject to review as necessary following any new policy and guidance from the Government on the matter.
- 1.6 The BNG requirements for new development are set out in section 2 of the TAN, and is divided into the following sections:
- **Scope of the BNG requirements** – An explanation of the type of development BNG requirement apply to, the amount of BNG required, and how it should be measured.
  - **What is required to support a planning application** – An overview of the what is required as part of a Biodiversity Gain Plan, the Biodiversity Metrics and other information to be submitted as part of an application.
  - **A meaningful contribution to nature recovery** – The key principles that are expected to be applied and demonstrated in the development of BNG proposals for development.
- 1.7 This TAN is a material consideration that will be taken into account by decision makers both at the Authority and at the host authorities working on our behalf<sup>1</sup> when determining planning applications that are within the scope of BNG requirements.

---

<sup>1</sup> Winchester District Council, East Hampshire District Council, Chichester District Council, Horsham District Council and Lewes District Council

## 2. BIODIVERSITY NET GAIN REQUIREMENTS FOR DEVELOPMENT PROPOSALS

---

### Scope of the Biodiversity Net Gain Requirements

#### Is BNG required now?

- 2.1 Yes, BNG is required now in the National Park in line with Policy SD9 of the South Downs Local Plan. **Therefore, as part of the adopted development plan, proposals for development are required to address BNG.**
- 2.2 In the national policy context, the National Planning Policy Framework (NPPF), Paragraph 180, refers to securing measurable net gains for biodiversity. Paragraphs 22 to 27 of the National Planning Practice Guidance (NPPG) on the Natural Environment provide further information and guidance on BNG.
- 2.3 The Environment Act received Royal Assent on 09 November 2021. The Government's response to the 2018 consultation on net gain set out that there would be a two-year implementation period for mandatory BNG once the Environment Bill received Royal Assent and became the Act. The Act includes provision for secondary legislation to set a date for the requirement to come into force. Consultation on the secondary legislation is expected imminently.
- 2.4 **This TAN provides interim guidance on how development proposals will be expected to address the SDLP policy requirement in the transition period** toward legally mandatory BNG as required in the Environment Act 2021. This interim guidance is informed by the clear direction of travel set by the Environment Act 2021 and guidance from Natural England.

Policy SD9(1)(b) requires development proposals to '*identify and incorporate opportunities for net gains in biodiversity*'.

*South Downs Local Plan  
Adopted 2019*

#### How much BNG and how is this expected to be measured?

- 2.5 We are seeking a **minimum of 10% net gain in biodiversity**. This is based on the upcoming mandatory requirement as set out in the Environment Act 2021. Importantly, opportunities for BNG are expected to be maximised in development proposals **and must demonstrate making a meaningful contribution to nature recovery** (see Nature Recovery section below).
- 2.6 Applications for relevant development proposals are expected to demonstrate measurable BNG is achievable. **The change in biodiversity value is expected to be measured using the appropriate DEFRA Biodiversity Metric** (see Table I below) or other suitable method which demonstrates measurable BNG. The latest version of the relevant DEFRA Biodiversity Metric should be used. The completed DEFRA Biodiversity Metric Excel spreadsheet should be submitted alongside a PDF version.

#### What types of development do the BNG requirements apply to?

- 2.7 Table I below sets out the BNG requirements that are expected for various types of development. The thresholds for using the two types of Biodiversity Metric are from Natural

England guidance that supports these Metrics. Guidance for development which is excluded from needing to address BNG is SDNPA interim guidance. It is expected that forthcoming regulations will establish the type of development that is excluded from addressing BNG when it becomes a legal requirement; the regulations, when they come into effect, will supersede SDNPA guidance on excluded types of development.

Type of development	BNG Requirement
<ul style="list-style-type: none"> <li>• Householder development, extensions, permitted development, prior approval, and applications on sites that do not contain habitats.</li> </ul>	These will not be required to achieve BNG requirements as set out in this interim guidance. However, development proposals will be expected to demonstrate an overall positive impact on the natural environment as set out in SDLP Policy SD2. This should be demonstrated through an Ecosystem Services Statement accompanying the application as required by Policy SD2.
<ul style="list-style-type: none"> <li>• Residential development of 1-9 dwellings on a site less than 1ha; or</li> <li>• For a housing development where the number of dwellings to be provided is not known and the site area is less than 0.5 hectares; or</li> <li>• For all other development types, the site area is less than 0.5ha or floorspace less than 5000m<sup>2</sup>.</li> </ul>	<p>Maximise opportunities on site with a minimum of 10% BNG.</p> <p><b>Small Sites Metric:</b> If these types of development are on a site where there is no priority habitat<sup>2</sup> present within the development area (excluding hedgerows and arable margins), the Small Sites Metric may be used to demonstrate BNG. Otherwise Metric 3.0 should be used.</p>
<ul style="list-style-type: none"> <li>• Any development on a site where priority habitat is present; or</li> <li>• Residential development of 10 or more dwellings or residential development on a site of 1ha or more; or</li> <li>• For a housing development where the number of dwellings is not known and the site area is 0.5 hectares or greater; or</li> <li>• For all other development types, the site area is 0.5ha or greater, or floorspace 5000m<sup>2</sup> or greater.</li> </ul>	<p>Maximise opportunities on site with a minimum of 10% BNG.</p> <p><b>Biodiversity Metric 3.0:</b> Measured by the Metric 3.0 or latest version.</p>

Table 1 – Interim BNG requirements by type of development proposed

## Outline applications

2.8 For outline applications, it will be necessary to demonstrate that the development can achieve BNG in principle. Initial versions of the required evidence will be expected based on information available at the time; this includes an initial run of the Biodiversity Metric.

<sup>2</sup> A list of UK Biodiversity Action Plan (BAP) Priority Habitats is found here: <https://jncc.gov.uk/our-work/uk-bap-priority-habitats/#list-of-uk-bap-priority-habitats>

- 2.9 Habitat survey, including assessment of habitat condition (following Metric guidance) will be needed to establish the baseline for the site. Areas of the site for retention/protection and areas for proposed enhancement and the nature of these enhancements that could realistically be delivered as part of the development proposals should be identified and incorporated into the Metric run. Assumptions should be realistic, based on best knowledge, and be precautionary.
- 2.10 Reserved Matters applications should continue to demonstrate that BNG will be achieved and should add more detail to the Biodiversity Gain Plan, Metric and other required evidence as appropriate.

### **Location of BNG provision**

- 2.11 **Provision of BNG habitat creation and enhancement is expected to be on site in the first instance.** The BNG approach embeds a spatial hierarchy of habitat delivery, where there is a preference for onsite or local enhancements. The Biodiversity Metric 3.0 incentivises habitat delivery on or close to the development site through a ‘Spatial Risk Multiplier’, which reduces the biodiversity value of habitats delivered further away from the development.
- 2.12 There may be some instances where a minimum of 10% BNG cannot be delivered on-site and may involve off site provision. In such instances this should be clearly demonstrated through submitted evidence to be agreed with the Local Planning Authority. Off-site delivery of BNG can be achieved in two ways:
  - Off-site land under control of the applicant located nearby to deliver the BNG works required.
  - Off-site land under control of a third party to take on responsibility to deliver the BNG works required.
- 2.13 SDNPA is considering how it can provide a role in facilitating the provision of BNG in instances where it cannot be delivered on site. This could be for development sites inside and outside the National Park. At the time of writing, the SDNPA is currently undertaking a Call for Nature Sites - a pilot project seeking to identify potential land that could contribute to nature recovery across the South Downs National Park which closes on 17 January 2022. The SDNPA would like to work with interested landowners and land managers to identify and develop nature recovery projects by providing specialist advice and help to match make funding opportunities for suitable sites – which could include BNG offsetting. [Link to the SDNPA Call for Nature Sites](#)

### **What is required to support a planning application?**

- 2.14 For applications within scope of BNG as defined above, all the following should be submitted with the planning application to demonstrate BNG. These documents will be required for validation of the planning application.

#### **I. Biodiversity Gain Plan**

The principle of a Biodiversity Gain Plan is set out in the Environment Act 2021. The Biodiversity Gain Plan must cover:

- a) Information about how adverse effects have been minimised,
- b) Pre-development biodiversity value of on-site habitat,
- c) Post-development biodiversity value of on-site habitat,
- d) Any offsite BNG and its value, and
- e) Any credits purchased

The Biodiversity Metrics will provide information required for Biodiversity Gain Plan requirements (b) to (d). More information is expected on what biodiversity gain plans should cover in the DEFRA consultation on BNG regulations expected imminently.

2. **The completed relevant Biodiversity Metric** in excel and .pdf format. Excel is the format which will enable officers to most practically review the proposals set out in the Metric. The Public Access system does not support Excel documents so the .pdf version will be uploaded for the public view.
  3. **A biodiversity baseline/ecological study.** This should meet the requirements of the relevant Biodiversity Metric used.
  4. **Map showing habitat lost, enhanced, and created.** Showing clearly where the habitat units occur for both pre-development (baseline) and post-development (habitat retained, enhanced, and created) values.
- 2.15 In addition to the above, to determine submitted planning applications, suitable information regarding the following is required:
5. **Information about how the habitats will be implemented, managed, and monitored for a minimum of 30-years.** This should be provided to demonstrate the BNG proposals are deliverable and achievable. For smaller applications this may be incorporated into the Biodiversity Gain Plan for example. For larger or more complex proposals a Landscape and Ecological Management Plan (LEMP) is likely to be required. Please seek further advice for the Authority on this.
  6. **Explanation of how the BNG approach chosen makes a meaningful contribution to nature recovery.** See Nature Recovery section from paragraph 2.23 onwards for more information about this.

## About the Biodiversity Metrics

### *Introduction to the DEFRA Biodiversity Metrics*

- 2.16 The metric is an excel spreadsheet, using information about habitats as a proxy measure for biodiversity. Information is entered about the habitats present. The metric translates this information into a score which is presented in biodiversity units. The information needed is taken from habitat surveys/assessment of the site.



Figure 1 - Habitat information for the Metric

- 2.17 Information on each habitat type is present prior to development (at the time of application, taking into account any deliberate harm to biodiversity in the recent past) is entered to form the baseline. Then the proposed post development habitat information is entered. If off-site BNG is proposed, the baseline and post-development scores for the offsetting site are also entered. To meet BNG requirements, a development must have a sufficiently higher biodiversity unit score after development than before development.

- 2.18 Irreplaceable habitat<sup>3</sup> is excluded from the Metric because its protection and enhancement is covered by other policy requirements. More information about this is set out in Table 2 and in the Nature Recovery section.
- 2.19 The latest Biodiversity Metrics are expected to be used: [Biodiversity Metric 3.0](#) and [Small Sites Metric](#).

*Table 2 - Guidance on general information required for the Biodiversity Metrics*

<b>Habitat Type</b>
<p>This is selected from a drop-down menu in the Metric. Habitat types are based on the <a href="#">UK Habitat Classification System (UKHab)</a></p> <ul style="list-style-type: none"> <li>• Area (e.g. grassland, woodland etc.), watercourse, and hedgerow habitat must be recorded separately in the Metric due to some differences in the mechanics/formulas.</li> <li>• All habitats within the red line boundary must be recorded.</li> <li>• Choices about habitat types to be retained, created, and enhanced are expected to be realistic and appropriate for the site. <ul style="list-style-type: none"> <li>◦ Considerations include the ecological context of the site, soil type, and what can meaningfully be created in the 30-year period (See Nature Recovery section).</li> <li>◦ The distinctiveness or habitat proposed should be realistic. Highly distinctive habitats can be challenging to create. Any proposals for high distinctiveness habitats must be supported with robust justification based on existing conditions and appropriate management.</li> <li>◦ ‘Trading down’ of habitats must be avoided. This means habitats of lower distinctiveness should not be created to compensate for higher/more important distinctiveness being lost. Losses should be replaced on a ‘like for like’ or ‘like for better’ basis.</li> <li>◦ Explanation for choices made can be set out in the space for further comment within the Metric itself and/or in supporting documents such as the Biodiversity Gain Plan.</li> </ul> </li> <li>• Irreplaceable habitats include ancient woodland. The biodiversity metric is not designed to address irreplaceable habitats and so such habitat must be excluded from the Metric and any potential impacts to such habitat addressed separately.</li> <li>• Bat boxes and bird boxes <u>are not</u> options available to select from the drop-down menu. These therefore <u>do not</u> count toward BNG but are important general biodiversity enhancements and may be appropriate mitigation for protected species.</li> </ul>
<b>Habitat Condition</b>
<p>Assessment of condition is only required when using the Biodiversity Metric 3. The Small Sites Metric gives a standard value for condition which auto completes in the spreadsheet and cannot be altered.</p> <ul style="list-style-type: none"> <li>• Assessment of condition is expected to follow the guidance set out in the DEFRA Habitat Condition Assessment Sheet and Instructions.</li> <li>• It should be demonstrated why the condition score has been chosen with reference to the scoring criteria in the guidance. It is recommended that the completed Habitat Condition Assessment Sheets with explanation is submitted.</li> <li>• Proposed target condition must be realistic and supported by ecological evidence and a suitable management approach. In most cases, the target condition of created or restored habitat should be moderate. For enhancements to habitat, in most cases, only one step change upwards in condition will be realistic. Any proposed further increase in condition must be robustly justified.</li> </ul>

<sup>3</sup> Irreplaceable habitat is defined in the NPPF 2021 as: ‘Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

### Habitat Type

This is selected from a drop-down menu in the Metric. Habitat types are based on the [UK Habitat Classification System \(UKHab\)](#)

- Area (e.g. grassland, woodland etc.), watercourse, and hedgerow habitat must be recorded separately in the Metric due to some differences in the mechanics/formulas.
- All habitats within the red line boundary must be recorded.
- Choices about habitat types to be retained, created, and enhanced are expected to be realistic and appropriate for the site.
  - Considerations include the ecological context of the site, soil type, and what can meaningfully be created in the 30-year period (See Nature Recovery section).
  - The distinctiveness or habitat proposed should be realistic. Highly distinctive habitats can be challenging to create. Any proposals for high distinctiveness habitats must be supported with robust justification based on existing conditions and appropriate management.
  - ‘Trading down’ of habitats must be avoided. This means habitats of lower distinctiveness should not be created to compensate for higher/more important distinctiveness being lost. Losses should be replaced on a ‘like for like’ or ‘like for better’ basis.
  - Explanation for choices made can be set out in the space for further comment within the Metric itself and/or in supporting documents such as the Biodiversity Gain Plan.
- Irreplaceable habitats include ancient woodland. The biodiversity metric is not designed to address irreplaceable habitats and so such habitat must be excluded from the Metric and any potential impacts to such habitat addressed separately.
- Bat boxes and bird boxes are not options available to select from the drop-down menu. These therefore do not count toward BNG but are important general biodiversity enhancements and may be appropriate mitigation for protected species.

### Spatial Location / Strategic Significance

This refers to whether the site is within a local strategy for biodiversity. A multiplier is applied to favour BNG contributing towards a local strategy for biodiversity.

- In due course Local Nature Recovery Strategies, a new requirement in the Environment Act, will be key relevant strategies.
- In the interim other strategies such as Biodiversity Opportunity Areas and the South Downs People and Nature Network may be referenced.

2.20 In addition to the general points, the following specific considerations and requirements for each type of Biodiversity Metric must be addressed.

#### 2.21 Small Sites Metric:

- Specifically designed for use for small development sites as set out in table I. Usage is optional. Applicants can still use Biodiversity Metric 3.0 if preferred.
- For simplification more of the metric autocompletes and condition information is not needed. Full habitat surveys are not required.
- Only to be used to calculate on-site biodiversity units.
- Cannot be used if priority habitat is present in the development area (excluding hedgerow and arable margins)
- The SSM and associated biodiversity assessment needs to be undertaken by a ‘competent person’ defined as someone who is ‘confident identifying habitats present before development and identifying the land management requirements for habitats which will be created or enhanced’. This person does not need to be a qualified ecologist.

#### 2.22 Biodiversity Metric 3.0 (the ‘full Metric’):

- Full habitat surveys are required, including assessment of habitat condition.

- The Metric and associated ecological survey must be completed by a qualified ecologist.
- Must be used when there is priority habitat on site.
- Must be used when off-site BNG is proposed.
- Less is auto completed and therefore use of this Metric allows for more control of inputs.
- This Metric can be chosen to be used for proposals normally within scope of the Small Sites Metric if preferred.

## A meaningful contribution to Nature Recovery

- 2.23 The purpose of Biodiversity Net Gain is ultimately about contributing to nature recovery. **To succeed in this, it is essential that BNG proposals must be meaningful, respond to contextual evidence, maximise opportunities for nature, and follow best practice principles.** The following principles must be addressed by development proposals and demonstrated through the submitted supporting information.

### Existing biodiversity protections and best practice principles still apply

- 2.24 All other biodiversity requirements, policies and best practice are expected to be fully addressed alongside BNG. BNG does not replace these existing requirements and protections, and these must be demonstrated as part of any planning application.

#### *The mitigation hierarchy*

- 2.25 The introduction of BNG does not weaken or replace the mitigation hierarchy. BNG is in addition and following application of the hierarchy. The mitigation hierarchy sets out that impacts on biodiversity must first be avoided, then mitigated, and only as a last resort, compensated. This must be done before measures that will provide a BNG can be identified.
- 2.26 It is necessary to set out how the development proposals have avoided impacts to biodiversity in the Biodiversity Gain Plan. Application of the hierarchy through the design phase will reduce impacts to biodiversity on site and the wider ecological network and make it easier to achieve BNG.

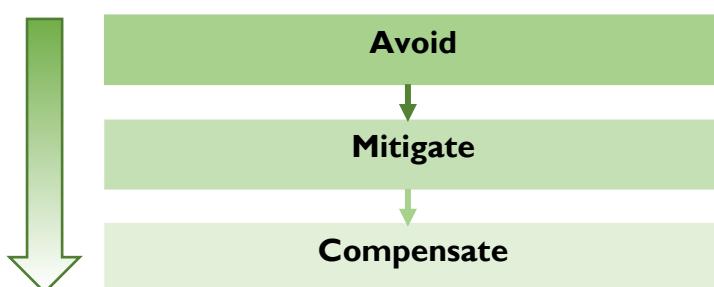


Figure 1 - The Mitigation Hierarchy

#### *Protected habitats and species*

- 2.27 BNG does not replace existing protections for designated sites and protected species.
- 2.28 The Biodiversity Metrics are habitats based and do not address species, including rare, notable, and protected species into consideration. It will therefore be necessary to demonstrate how species have been considered, protected and supported through the other aspects of the planning application in order to address legal requirements and policy SD9(1)(d) of the South

Downs Local Plan. Actions to support protected species is expected to influence choices in habitat retention, enhancement, and creation.

- 2.29 Actions to mitigate or compensate impacts to protected habitats or protected species should not be included in the Metric because these are separate requirements to avoid harm and to meet legal requirements.

#### *Irreplaceable habitat*

- 2.30 Irreplaceable habitats are highly valued and protected habitats. Development resulting in the loss or deterioration of Irreplaceable Habitats should be refused unless there are wholly exceptional reasons as per South Downs Local Plan Policy SD9(2)(c). The biodiversity metric is not designed to address irreplaceable habitats and so such habitat should be excluded. Any potential impacts will need to be addressed separately and any actions to mitigate and compensate should not count towards BNG.

### **A landscape-led approach to Biodiversity Net Gain**

- 2.31 Development proposals are required to take a landscape-led approach in accordance with South Downs Local Plan Policies SD4 (Landscape Character) and SD5 (Design) and supporting information including the Design Guide SPD. **All proposals are expected to take a landscape-led approach to BNG.**
- 2.32 A landscape-led approach means good contextual design. **For BNG this means responding to landscape character, function, and ecological context of the site.** A landscape-led approach should support actions for the 'right habitats, in the right places, for the right reasons', maximise multiple benefits, and continue to meaningful nature recovery.
- 2.33 The following principles should be considered and demonstrated through development proposals as appropriate:

#### **1. Applicants should consider this at earliest stages in the design process.**

Considering BNG at the early stages of the design process will help to achieve better outcomes for biodiversity and will avoid the need to retrofit BNG measures at a late stage resulting in costly changes to design proposals. The Biodiversity Metric can be used early in the design process, to quantify and evaluate the impacts of different design options.

#### **2. Respond to site specific evidence.**

It is important to gather information on the current and past uses of the site. Habitat/ecological survey is required to support BNG and is needed to gather the information required for the Metric. In addition, these surveys provide important information to guide BNG choices (habitat retention, creation, enhancement) for the site.

The current habitat types will give important clues, but further information on site specific evidence may be needed on soil types and current or previous uses and how that may impact the realistic possibilities for BNG choices for the site. For example, soil enrichment from fertilisers applied will make creation or certain habitat types more challenging. Consideration of past uses and past habitat on the site may also give a positive steer on opportunities for restoration, for example, restoration of lost hedgerow.

#### **3. Respond to the local landscape and ecological context of the site.**

This is essential to identify actions to contribute to meaningful nature recovery. As part of evidence gathering and project design the following questions can guide:

- ‘What is the current function of the site within its wider ecological context / the ecological network?’ and ‘How can these be conserved and enhanced through the approach to BNG for this site?’
- ‘What are the ecological patterns and elements of the local area’ and ‘How can these be supported, enhanced, restored through the approach to BNG for this site?’

Ecology assessments such as Preliminary Ecological Appraisals (PEA) and Ecological Impact Assessments (EIA) include a section on habitats in the wider area. These often only address designated sites within a certain distance of the site. Non-designated habitats and the network they provide are of important value for biodiversity and habitat connectivity. It will be necessary for supporting ecology assessments to provide information on the habitat context of the site of all types of habitat in addition to designated sites to ensure the proposed development site is understood in its context and meaningful BNG opportunities are identified.

#### **4. Informed by strategic/adopted evidence and guidance.**

Important information via evidence and objectives for landscape and ecology of the area are found in a range of existing publications which can be used to inform and support BNG actions. The South Downs Landscape Character Assessment 2020, and any subsequent update should be used. The SDNPA ‘Nature Recovery: information for delivery partners’ webpage has information and resources for nature recovery in the South Downs National Park. The website is updated as new information and resources become available.

Habitat creation and enhancement which delivers on strategic objectives get a weighting uplift within the Biodiversity Metric. In due course Local Nature Recovery Strategies, new requirements in the Environment Act 2021, will be important to steer BNG for nature recovery. There are a range of existing resources that can be considered now, for example the South Downs People and Nature Network, and Biodiversity Opportunities Areas.

#### **5. Bigger, better, and more joined up.**

For meaningful contributions to nature recovery, BNG actions should seek to support bigger, better and more joined up habitat, safeguarding and enhancing habitat connectivity locally and at wider landscape-scale. For example:

- Repair and restore – missing links such as hedgerows.
- Expand existing habitats – is there habitat adjacent to the site which could be expanded to improve its functionality?
- Buffer habitats – woodland adjoining a site could be expanded and buffered with a grassy woodland edge.
- Don’t create islands – All habitat that is retained, enhanced, and created is expected to have suitable and meaningful connectivity to the wider ecological network.
- Re-nature – habitat that has been heavily modified, such as culverted watercourse, could be opened to function by natural processes and create valued habitat and connectivity.

#### **6. Support naturally functioning ecosystems and use of nature-based solutions.**

This can support achieving multiple benefits, wider environmental net gain and ecosystem services. An example of this is regarding managing water on a site. Ensuring that the natural function of watercourses, their corridors including floodplain in the first instance, plus use of Sustainable Drainage Systems (SuDS) to avoid hard engineering solutions where possible.

## **7. Well designed for functionality.**

Habitats that are retained, enhanced, and created must be functional for their intended purpose in their size, nature, and location. BNG habitat must not be too small, isolated, or impacted by surrounding uses that would impair its ecological function. Consideration must be given to impacts arising from development such as lighting, and recreational impacts such as dog walking.

# Appendix – The BNG Checklist

---

This can be used for all applications within scope of BNG as set out in table I of this TAN. For further information on the points below, please refer back to the TAN.

If any of the answers to these questions are ‘no’ then the applicant will need to provide the missing information to the case officer and ecology consultee.

Please note this checklist is for use as an *aide-mémoire* and is not exhaustive.

---

## BNG documents required

Have the correct supporting documents been submitted as required by this TAN?

- Biodiversity Gain Plan
  - Map(s) of the site, and maps showing any BNG which is to be provided offsite.
  - Excel and .pdf copy of the completed relevant Metric or other measurement of BNG?
  - Habitat/ecology survey
- 

## Biodiversity Gain Plan

- Has it been clearly set out how harm has been avoided following the mitigation hierarchy?
  - Is there a pre-development biodiversity value score?
  - Is there a post-development biodiversity value score given?
  - If offsite BNG is going to be provided, is the nature of this, including its value given?
- 

## Measuring BNG

- Has a measurement of BNG been provided?
  - If the Biodiversity Metrics have been used, is it the correct type and version? As per table I and paragraphs 2.21 and 2.22 of the TAN?
  - Is a % BNG proposed?
  - Are all habitats in the red line boundary accounted for?
  - Have the reasons for the condition scores been set out, in accordance with the DEFRA guidance?
  - Are there high distinctiveness habitats proposed for creation/enhancement? If so, is there sufficient evidence to support this?
  - Is a high level or more than one-step change in condition proposed? If so, is there sufficient evidence to support this?
  - Is the strategic significance consistent with the relevant strategy/guidance document?
  - Has trading downs been avoided?
  - Proposals do not include irreplaceable habitats which should be addressed separately
  - Proposals do not include bird boxes/bat boxes and similar as they do not count toward BNG?
  - Any measures to mitigate or compensate for harm have not been included in the BNG score?
-

## **Habitat Survey / Ecology Assessment**

- Is the appropriate type of survey/assessment submitted for the right type of Metric?
  - If SSM – has the assessment been completed by a ‘competent person’ defined as someone who is ‘confident identifying habitats present before development and identifying the land management requirements for habitats which will be created or enhanced’. This person does not need to be a qualified ecologist.
  - If Biodiversity Metric 3.0 or latest version – full habitat survey been completed by a qualified ecologist?
- 

## **Maps**

- Is a baseline habitat map, showing the parcels of land corresponding to the Metric, provided?
  - Is a proposed BNG habitat map, showing the parcels of land corresponding to the Metric, provided?
- 

## **Management**

- Has information been provided to clearly show how the proposed BNG habitats will be implemented, managed, and monitored for a minimum of 30-years?
- 

## **Nature Recovery**

Has it been demonstrated the following have been addressed? Have BNG proposals:

- Responded to site specific evidence.
- Responded to the local landscape and ecological context of the site?
- Been informed by strategic/adopted evidence and guidance as relevant?
- Provided bigger, better, and more joined up habitat?
- Supported naturally functioning ecosystems and use of nature-based solutions where possible and appropriate?
- Been well designed for functionality, taking into account impacts from nearby development?