



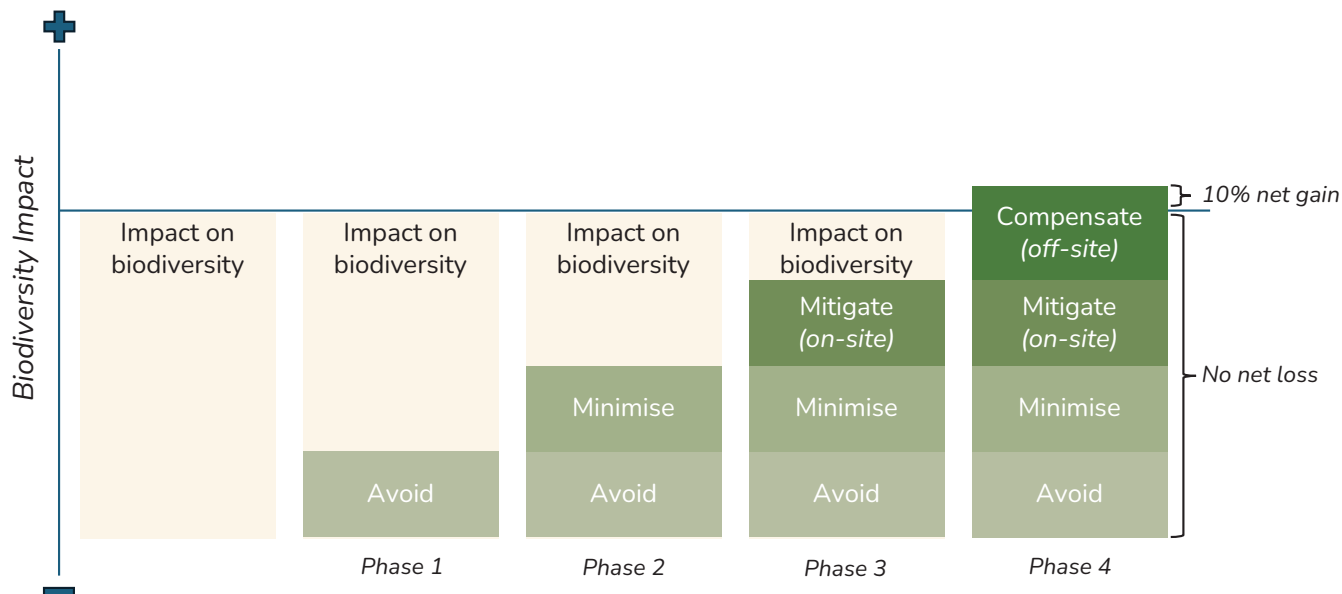
Demand Side

For the first time, developers across England are required to quantify the ecological impact of their development plans on a site and its habitats, using the statutory biodiversity metric. This impact must not only be met with actions from the developer that result in no net loss to biodiversity, but also deliver an additional 10% gain.

Options for developers to meet their BNG requirement are outlined in the mitigation hierarchy⁴⁴, which sets out the order in which action must be taken, first:

- avoiding and minimising ecological harm to existing on-site habitats,
- compensating any harm with new or enhanced on-site habitats,
- offsetting harm by purchasing off-site biodiversity units provided by landholders nearby,
- using the statutory biodiversity credit scheme, which is run by Natural England and acts as a ‘seller of last resort’ and delivers funds into BNG projects nationally.

Mitigation hierarchy of developers



All of this is underpinned by the planning system, within which developers must submit information to their LPA on how they will deliver their BNG requirement before development can commence. Though there are exemptions, this requirement applies to most major and small site developers submitting planning applications from the 12th of February 2024.

While developers must meet this requirement in the planning system, BNG should also be understood by other ‘demand-side’ actors, including planning consultants, land promoters, management companies and landscape architects – whose services may relate to the delivery of BNG.

What do developers think about BNG?

Research has shown that developers are broadly supportive of BNG and want to see it work well – one survey⁴⁵ showed that 95% of surveyed developers and land promoters are in support of BNG, with only 5% opposed, despite the fact that BNG presents new requirements and processes to follow.

For many developers, BNG presents a large and tangible step in solving the perceived trade-off between England’s need for further development – including the government’s target of 1.5m new homes over the next five years – and a thriving natural environment.

However, as with any new policy of this scale, there are challenges to work through before this burden can be delivered with the required ease and consistency that developers need.

The off-site option for developers is crucial – with the lack of land onsite to deliver BNG listed as the most common concern (88%) by developers and land promoters within the same survey⁴⁵. Currently, the lack of LPA resourcing and a ready supply of off-site units are two barriers that are often cited by developers as the underlying reasons why they are struggling with accessing BNG off-site solutions. In turn, this may lead developers to maximise their on-site gains – sometimes in ways that are not ecologically or commercially efficient – delaying their development plans, or changing design plans to qualify for exemptions to BNG.



Some market stakeholders have also highlighted the fact that these barriers are not felt evenly across the development sector. Small-site developers, for example, are most likely to require off-site units as they do not have as much land within their boundary to use, often at small or fractional volumes that are more difficult for off-site providers to sell¹¹.

Conversely, market stakeholders are already discussing how BNG will work for Nationally Significant Infrastructure Projects (NSIPs), which are planned to come under mandatory BNG policy in November 2025. These are expected to require larger volumes of units, and some market stakeholders are exploring how units may be aggregated, sold, and aligned with local planning systems with ease.

Much work is being undertaken in the industry to explore BNG and develop common best practices in meeting the BNG requirement. This includes the work of the Future Homes Hub, which was established to facilitate the collaboration needed within and beyond the new homes sector to help meet the climate and environmental challenges ahead. In early 2023, it established a working group on BNG and in April 2024, it launched BNG Online⁴⁶ in partnership with the Planning Advisory Service (PAS), to help both developers and LPAs adopt best practices for BNG delivery.

What needs to be addressed?

From May 2024, the GFI Hive had several one-to-one discussions with representatives from the development sector and other demand-side stakeholders. Many of the challenges discussed were related to the off-site market component of BNG and shared amongst other stakeholders – including the lack of ready off-site units and the different approaches taken by LPAs. Others were centred on developers' own requirements – those within the planning process, and the long-term obligations thereafter.

Short term (1-2 years)

- Explore mechanisms to unlock visibility over viable local supply, including actions to increase the ready supply of off-site units.
- Work with industry to further assess small site and large-site developer needs – including the purchase of fractional units and the needs of Nationally Significant Infrastructure Projects (NSIPs).
- Within the planning system:
 - Promote the 'front-loading' of BNG information at validation stage, particularly relating to post-development on-site habitats.
 - Support the standardisation of BNG-related planning documents and processes, in line with LPA best practices.
 - Review the criteria for developer exemptions from BNG, providing clarity over the process to follow when BNG must be applied retrospectively.
 - Conduct a wider review of the planning process with respect to BNG, in line with the review of LPAs' delivery of BNG, within the next two to three years.



- Provide further guidance to LPAs on the permission.
- Work with relevant industry to provide further guidance of on-site habitat management, including the use of protective fencing, preventative management practices, and pesticides.
- Review the process of excess unit sales from developers, providing guidance to LPAs on testing for additionality.

Medium term (3-5 years)

- Work with relevant industry to:
 - Upskill the building management sector and others to be tasked with on-site habitat management over the 30 year period.
 - Support the creation of an accreditation process for on-site habitat management providers to follow, demonstrating the required skills and capacity – in line with sound ecological guidance developed for on-site habitats.
- Iterate the reporting requirements for on-site habitats over the 30-year period, in line with findings from LPAs' Biodiversity Duty reporting.
- Work with industry to conduct viability assessments of +10% ambitions of LPAs – in order to better inform future policy-making.

1. Support increased availability and ready supply of off-site units.

Priority: High

Summary:

While there has been much interest on the supply-side, many developers and other demand-side actors are concerned about the ready supply of biodiversity units where the underlying site:

- has a local land charge, such as an S106 agreement or conservation covenant,
- is registered on the biodiversity gain sites register.

Both are requirements before the developer can apply to the LPA to discharge the BNG pre-commencement condition, allowing them to start development.

Several prospective sites have come forward with biodiversity units to offer, and various marketplaces – both local and national in scope - have been created that shows the extent of this potential supply. For example, Gaia is an online marketplace that currently lists over 25,000 units in England available for sale, listing at an average price of £30k per unit⁴⁷.



However, these prospective sites are at various stages of market readiness – often ranging from initial baselining conducted to having fully developed BNG plans and signed local land charges. As such, developers have expressed concerns that there is not enough ready supply to rely on offsite BNG within their planning applications, without risking serious delays to their development plans.

As a result, developers may feel they need to maximise their on-site BNG, modify their development plans to qualify for exemptions, purchase land to supply their own off-site units internally, or postpone their development plans altogether. In turn, this may lead to a perceived lack of demand for off-site biodiversity units, which would further deter the supply-side.

Overwhelming feedback from the market has suggested that a major bottleneck to such supply is the lack of signed conservation covenants and S106 agreements – for which LPAs and Responsible Bodies are under considerable pressure to provide, but do not have fully developed processes or resource to do so at scale (see Central Governance for more detail).

Potential Solutions for Central Government:

- Analyse the levels of prospective supply across England, harvesting data from BNG-linked platforms and marketplaces, to determine where and what bottlenecks may be present.
 - Explore the automation of data flows between aggregation services (including marketplaces) and central government’s monitoring and evaluation strategy, including in off-site applications to the biodiversity gain sites register.
- Building on the above, review recommendations to unlock supply – including those relating to:
 - the use of S106 agreements (Action #2 in Supply Side) and
 - the provision of further funding and support to LPAs (Action #1 in Central Governance).
 - The designation of further Responsible Bodies (Action #5 in Central Governance).

Future Homes Hub

In June 2024, the Future Homes Hub (FHH) published a Biodiversity Offsets Checklist for developers to use for the assessment of off-site BNG proposals, in the absence of a S106 agreement, conservation covenant and Biodiversity Gain Site registration. The Checklist contains 24 items for developers to check with an off-site provider that gauge their level of preparedness and due diligence, asking for evidence around the proposal’s ecological data and metric calculations, Habitat Management and Monitoring Plan, general governance planning, and other important aspects. The Checklist is offered as general guidance, not aligned with any specific LPA but designed with insight from Natural England, PAS, Verna, CIEEM, consultants, several developers and other market stakeholders. The Checklist is also aligned with the BBOP Biodiversity Offset principles, which were published in 2018.



2. Review the exemptions criteria and process for BNG.

Priority: High

Summary:

Some developments are exempt⁴⁸ from the BNG requirement – including householder applications, urgent crown developments and biodiversity gain sites themselves. While most of these exemptions are consistently interpreted, developers and LPAs have reported some difficulty in the consistent application of the below exemptions:

- **De minimis threshold** – “A development that does not impact a priority habitat and impacts less than 25m² of on-site habitat or 5 metres of on-site linear habitats, such as hedgerows.”

Feedback from market stakeholders has reflected that the definition of ‘impact’ is widely interpreted, despite the clarity provided in the regulations itself and the planning framework. For example, some developers have counted the area of their redline boundary as impacted (as was the rule before December 2023), while others have counted only the footprint of their buildings as impacted – despite concerns that habitats around this area would highly likely be impacted during construction and/or occupation. This results in additional pressure being placed on the LPA at the point of application validation and a risk of small parcels of habitats being fragmented and excluded from wider ecological planning.

- **Self build and custom build applications** – “A development that consists of no more than 9 dwellings, on a site that has an area no larger than 0.5 hectares, and consists exclusively of dwellings that are self-build or custom housebuilding as defined by Section 1(A1) of the Self-build and Custom Housebuilding Act 2015,” (SCHA)⁴⁹.

Anecdotally, LPAs have received significantly more self-build and custom build applications since 12 February 2024. Some market stakeholders have highlighted that the definitions under Section 1(A1) of the SCHA are open to wide interpretation and are difficult to verify in practice, leading to a significant risk of misuse in the context of BNG exemptions.

Building on the above, there has also been debate in the market over how these exemptions will be verified beyond developer disclosure and, if found disqualified once construction has started (such as through retrospective applications), what recourse can be taken to ensure that the BNG obligation is fully met.

Potential Solutions for Central Government:

- Review the definitions used within the de minimis threshold and self-build and custom build application exemptions – reviewing planning applications made after 12 February 2024 to explore how these could be made more specific.



- Collect and publish data on the number of applications that apply under BNG exemptions and what proportion this amounts to of all applications, to help clarify how these are being used, as part of the wider monitoring and evaluation strategy of BNG policy.
- Clarify the process that LPAs must take where developments are found to be disqualified from exemptions - including how their BNG obligation can be met retrospectively.
 - For example, require certain permitted developments – such as temporary structures - to submit a BNG baseline assessment under the (more easily used) small sites metric, so that BNG baseline data can be relied on to calculate the BNG obligation, if required.

3. Address difficulty in matching supply and demand volumes – including the purchase of small or fractional biodiversity units.

Priority: High

Summary:

Developers may require the purchase of small or fractional biodiversity units – for example 0.1 biodiversity units – to meet their full BNG obligations. This need has become more prevalent as the mandatory BNG duty came into effect for small developments, typically of one hectare or less, on 2 April 2024⁵⁰.

However, developers and market intermediaries - such as brokers and LPAs interested in matching local supply and demand – are reporting some difficulty with securing agreements for these smaller unit offerings from landholders with ready supply. This is believed to be because landholders are reluctant or deterred in signing multiple unit sale agreements and local land charges (sometimes required by LPAs) on a single piece of land that require more resource to execute and administer over the 30 years. Dividing up units in this way can also drive more complex processes for remaining biodiversity unit calculation, management and trade.

Note: though the above reflects the difficulties faced in purchasing few or fractional biodiversity units, many market stakeholders also draw parallels with larger purchases of biodiversity units and the difficulties in aggregating unit volumes across multiple sites. This issue is expected to become more prevalent as the market develops, such as with the inclusion of Nationally Significant Infrastructure Projects (NSIPs)⁵¹ under mandatory BNG policy, expected to come into force from November 2025. Some have voiced concern that without appropriate planning, NSIPs may not be able to access enough off-site units or monopolise the available supply to the point where other developers are cut off from off-site solutions.



Potential Solutions for Central Government:

- Work with relevant industry to explore where the process of purchasing and selling fractional biodiversity units can be de-risked and made more efficient. For example:
 - Independently assess the needs of small-site developers to better understand their access to the BNG off-site market.
 - Promote the use of ‘umbrella’ S106 agreements that allow for single local land charges to be signed for sites that can then conduct multiple unit sales with more efficiency.
 - Assess current technology services in the market that automatically (dis)aggregate and match supply and demand, such as exchange platforms catering specifically to smaller scale developers and off-site providers.

4. Support the standardisation of planning document templates and processes with LPAs.

Priority: High

Summary:

Developers are reporting discrepancies across different LPAs that make it more difficult to navigate the new BNG requirements within the planning system in a consistent and efficient manner. Equally, LPAs are experiencing different levels of preparedness and awareness among developers when providing information within their planning applications.

For example, LPAs require several legal documents in the delivery of BNG. Some LPAs have shared examples and templates³⁸ of these documents, but drafting these without a central template has been resource intensive and can often reflect the bespoke approach of the LPA in question, which is permitted by central government. However, without a set of central templates there are concerns of both a duplication of effort across LPAs and a risk of minimum standards not being built into these documents, overall causing a delay in the discharge of the biodiversity gain condition.

Another issue is the legislative basis for including the biodiversity gain condition on the decision notice. Some market stakeholders have raised concerns that because the BNG requirement has its own separate statutory basis under a different part of the Town and Country Planning Act, the decision notice is not the appropriate place for the condition. As a counter argument, developers and LPAs have expressed confusion over how to apply for or grant a discharge of this condition if it is not attached to the decision notice, including through the Planning Portal – which only offers the option of discharging a condition attached to the decision notice. In its Planning Practice Guidance⁵², DHLUC has offered text for including the biodiversity gain condition on the decision notice. However, some market stakeholders maintain that a legislative review is needed to fully address the issue.



Note: other examples of where standardisation is sought include the validation lists that each LPA holds (see Action #4 in Central Governance), and with off-site S106 agreement templates (see Action #2 in Supply Side).

Potential Solutions for Central Government:

- Work with industry to provide standardised templates and guidance to LPAs in relation to developers, including:
 - The biodiversity gain (pre-commencement) condition.
 - A template condition discharge letter that sets out how to discharge the biodiversity gain condition when it is not included on a decision notice.
 - An S106 agreement template for securing on-site gains.
 - A certificate of purchase for off-site units.
 - A unit sale agreement for off-site units (links to Action #2 in Supply Side).

Note: on 05 July, the Planning Advisory Service (PAS) published a set of legal agreements³⁹ and documents for LPAs to use and adapt from, including the biodiversity gain condition and three S106 agreements under different use cases (including on-site and off-site provision). Following from this, this Roadmap recommends that central government continue their support of PAS and its work in keeping these documents up-to-date and creating further legal templates of relevance to LPAs and developers.

- If deemed necessary, include a review of the biodiversity gain planning condition and its correct discharge process within the statutory BNG review in the next three-to-five years.
- In the shorter-term, work with the Planning Portal to address points of friction within its user journey relating to BNG, including the discharge of the planning condition when not included on the decision notice.

Warwickshire County Council

With the establishment of Habitats Banks that wished to sell biodiversity units directly to applicants, Warwickshire County Council wanted to put in place a system to track unit sales or transfers within the emerging market. It did this through the Wildlife & Countryside Act Section 39 Agreements, where a Habitat Bank was required to inform the County on any unit sale or transfer. On receipt of this information the County verifies the sale against the development it was compensating for, to included trading rules. Each sale is given a unique identifier code as part of a Certificate of Sale.

This sale is returned to the Habitat Bank owner to pass onto the Purchaser (developer) who then submits the certificate as proof of compensation to the LPA. The LPA, be that anywhere in the country, can contact the County to confirm the certificate. The developer now owns these biodiversity units and is obliged to tell the County should they wish to sell or transfer them to another. They are also able to ask the County to 'split' the certificate into two or more certificates should they only use a proportion of the biodiversity units originally purchased from the original Habitat Bank. This approach enables developers to 'pre-purchase' units should they wish to 'invest' in a habitat bank.



5. Clarify reporting requirements for on-site habitats over the 30-year period.

Priority: High

Summary:

Some developers have expressed the need for further clarity over lifetime reporting requirements for their on-site habitats – both through significant and non-significant enhancements²³. This need relates to the use of management companies and other third parties, to whom the developer may transfer management and monitoring responsibilities (see Action #8). Developers have stated that this information is important to have up-front, so that any contracts or agreements signed with these third parties reflect such requirements.

LPAs have the discretion to set their own definitions for significant and non-significant gains, the latter of which tends to be very small in biodiversity value. While significant on-site gains are secured with an S106 agreement and a Habitat Management and Monitoring Plan (HMMP), non-significant enhancements do not require an HMMP, a legal agreement or a commitment to maintaining them for 30 years.

LPAs can also set their own reporting requirements for on-site gains overall and it's generally assumed that they will align these with their Biodiversity Duty⁵³ reporting requirements under the Natural Environment and Rural Communities (NERC) Act, which was enhanced by the Environment Act (2021) for BNG. This reporting is required at least every five years. LPAs may also ask for additional information for their own nature-based targets, including those within their Local Nature Recovery Strategies.

However, from a national perspective, the details of what LPAs need to report is not yet fully defined, which is causing uncertainty for developers (and to a lesser extent off-site providers). Since the launch of mandatory BNG, Defra has produced a draft spreadsheet on the BNG aspects of the Biodiversity Duty reporting and are currently consulting LPAs on this. Market stakeholders expect at least some information from the state of on-site habitats, e.g. where habitats are not on track to being delivered.

Potential Solutions for Central Government:

- Once the BNG requirements of Biodiversity Reporting are clarified with LPAs, work with relevant industry to create guidance on governance and reporting requirements for developers and management companies for on-site BNG delivery:
 - Include appropriate guidance for both significant and non-significant enhancements, for which data should be collected on the proportion by which these are used to meet developers' BNG obligations.
 - Ensure there is appropriate guidance for small-site developers.
 - Align with existing reporting requirements from the BS8683 specification⁵⁴.
 - Ensure that reporting requirements are aligned with the needs of a future on-site habitat registry (see Action #7 in Central Governance).



- Provide further clarity over appropriate habitats that qualify for non-significant enhancements, excluding those that caretakers have no legal control over.

6. Review the policy of excess unit sales – e.g. those from solar sites.

Priority: Medium/High

Summary:

Current government policy allows developers to sell any excess units delivered above the required 10% to other developers in England, provided this excess gain is registered (as with off-site units) and that there is genuine additionality for the excess units sold. This policy was brought forward in 2023 after a consultation was launched in 2022⁵⁵, however further guidance has not yet been published in either the planning practice guidance or guidance to LPAs.

There is significant concern amongst market stakeholders that this will result in few additional gains for nature compared to pre-BNG policy requirements. For example, development on former mineral sites has shown that there can be a substantial uplift in biodiversity gains under the business-as-usual planning requirements, due to the fact that these are starting from very low ecological baselines. Likewise, solar sites can have significant uplift if built on grasslands that are then allowed to grow alongside or under solar panels, but some argue that such gains would have taken place regardless of the presence of BNG policy.

Some market stakeholders argue that the process and associated risk of selling excess units will deter most developers from doing so, while in a select few cases (such as where the impacted area of a site is small), the allowance of excess unit sales will prompt developers to enhance further habitats on-site than otherwise. Counters to this have highlighted the need to build in the impact of anthropogenic pressures (such as neighbouring land use) into any metric calculations, as with general on-site and off-site BNG proposals (see Action #1 in Metric).

Overall, market stakeholders agree that clearer controls and guidance are needed. Otherwise, it is possible that many excess biodiversity units sold will not be additional. In this case, there is a significant risk of flooding local markets with a supply of cheaper units and stifling local ambition from off-site providers in delivering units with stronger additionality.

Potential Solutions for Central Government:

- Provide clear and rigorous guidance to LPAs on how to test for additionality and put restrictions in place where additional gains from on-site habitats are unlikely.
 - Draw on learnings on testing for additionality from other nature markets, such as voluntary carbon markets.



The Conservation Volunteers

The Conservation Volunteers (TCV) was established in 1959 as an environmental charity focused on volunteer contributions that can bring environmental and social benefits. It manages land primarily located in urban areas. Recently, TCV has been approached by developers with an interest in contracting TCV to manage and maintain their BNG habitats (on-site and off-site) over the required 30 years. TCV is exploring the particulars of these contracts, including the appropriate payments, liability management, along with value-add activities it can bring to these sites, such as engaging and connecting community volunteers to maintain these sites.

7. Provide guidance on appropriate management techniques of on-site habitats.

Priority: Medium

Summary:

Market stakeholders have expressed a need for more formal ecological guidance in managing on-site habitats over 30 years. Anecdotally, there has been some debate over the correct habitat management techniques to use for the purposes of BNG versus where on-site habitats may be managed more for amenity value. This is particularly called into question with land management activities that could be construed as ecologically destructive – such as routine grass cutting, or ash die back management.

Guidance over appropriate management techniques would aid developers in the design of their Biodiversity Gain Plans, and the LPA's due diligence in reviewing this document, ultimately leading to more robust BNG outcomes on-site. Developers have also highlighted the need for any guidance to be developed in partnership with landscape architects, management companies and other service providers that are heavily involved in the design and management of on-site habitats.

This request aligns with calls for more bespoke guidance that factors in the impact of anthropogenic pressures, such as guidance on pesticide use and the requirements for protective fencing (see Action #1 in Metric).

Potential Solutions for Central Government:

- Work with relevant industry to expand the guidance for on-site habitat management – including with ecologists, LPAs, developers, landscape architects and management companies to identify current gaps.
 - Ensure that appropriate guidance is made available to small site developers as part of this work.
 - Create long-term research programmes that can track the effectiveness of habitat management practices, to iteratively feed back into such guidance.



8. Help address expected skills shortages with management companies that have typically focused on the management of the built environment and amenity habitats.

Priority: Medium

Summary:

While developers are tasked with meeting the 10% BNG requirements in planning, it's generally expected that they will transfer the liability of managing the on-site habitats over 30 years to another organisation. One study⁴⁵ that surveyed land promoters and developers indicated:

- 56% said they planned to transfer the land onto a third-party management company that funds the on-site BNG by service charges paid for by the development's residents.
- 10% of respondents said their organisation would transfer the land to a charitable trust that funds the on-site BNG by capital payments paid by the developer.
- 5% said their organisation would transfer the land to the Local Authority/Town Council/Parish Council that funds the on-site BNG by capital payment paid by the developer.

Though the vast majority of responses indicate the intention to transfer this responsibility, the availability of appropriately skilled management companies was also listed as a major concern by 43% of respondents.

Although developers typically have longstanding relationships with management companies experienced in landscaping and managing habitats for social or amenity value, it is felt by the sector that managing sites for the purpose of BNG delivery will require more specialist skillsets and capacity. Some market stakeholders are also concerned that there is not a clear process should these management companies default on these responsibilities or cease operations entirely.

Potential Solutions for Central Government:

- Work with relevant industry to upskill those charged with on-site management, aligning with habitat management guidance (see Action #7).
- Over the longer term, support a government endorsed certification programme for companies and organisations charged with or assisting in on-site BNG habitat management.
 - Work with relevant industry to establish this - including ecologists, LPAs, developers, landscape architects, management companies and management agents.



- Clarify the process by which management companies or other on-site habitat managers default or exit on BNG management agreements – such as LPA step-in rights and the use of sink funds (linked to Action #9 in Central Governance).
- Ensure that private homeowners are protected from liability in this case.

9. Provide greater clarity regarding the allowance of cross-boundary sales.

Priority: Medium

Summary:

Anecdotally, some LPAs have shown reluctance to grant planning permission for developments that are purchasing units from outside of their boundaries. This may be for a number of reasons, for example due to other policy pressures (e.g. meeting nature restoration targets), or because of a perceived difference in approach to monitoring and auditing off-site BNG proposals.

However, some market stakeholders (including developers and off-site providers) consider this an unnecessary restriction given the way in which the BNG market is set up. In practice, the appeal for developers purchasing units beyond LPA/NCA boundaries is reduced by the spatial risk multiplier of the metric³⁹ – with a reduction of 25% in units bought from a neighbouring LPA/NCA and 50% if beyond the neighbouring LPA/NCA. It is argued by some that this should be a sufficient deterrent that will allow the market to settle without further restrictions from LPAs.

Further complexity is introduced when considering sites that are outside of LPA boundaries but within NCAs – and therefore without the penalty of the spatial risk multiplier. Anecdotally, some offsite providers have encountered a reluctance of LPAs to grant planning permission with units sold outside of their boundaries but inside NCAs, which are generally expected to generate stronger biodiversity gains due to the natural characteristics of NCAs.

Potential Solutions for Central Government:

- Provide more explicit guidance on cross-boundary sales, including through government circulars and DHLUC's PPG, which would set out where LPAs are justified in refusing cross-boundary sales.



Partnership for South Hampshire (PfSH)

Partnership for South Hampshire (PfSH) is a partnership of 11 LPAs covering 300,000 hectares that are focused on improving the environmental, cultural and economic health of the Solent area in South West England. PASH has previously helped unlock local barriers under its nutrient neutrality regulation, and has now broadened its scope to include the BNG market within its boundary, noting several similarities between these two compliance markets. PfSH is working on a unified BNG strategy, including a metric analysis of the area and common processes to share. Cross-boundary sales are also under review as part of this work. Cross boundary sales are also part of this work, ensuring that local authority boundaries do not impede the delivery of BNG schemes across National Character Areas.

10. Provide greater clarity over the requirements for large, multi-phased projects.

Priority: Medium

Summary:

Developers leading large and multi-phased development projects, which can take place over several years, have expressed some confusion over the particulars for how their BNG requirements should be carried out. For example, it is not clear on:

- how the baseline assessment is worked out over phases of development,
- what is acceptable for ongoing maintenance after the baseline assessment – so that the developer does not unwittingly falls foul of the ‘anti-trash’ clause on their own development sites,
- when the 30 year requirement starts when separate phases of development are completed.

Potential Solutions for Central Government:

- Work with industry to develop further guidance on the above points, including case studies of practical examples where such developments have been carried out to standard.