



Biodiversity Net Gain – Planning Advice Note

Guidance on the implementation of mandatory BNG as required under the
Environment Act 2021

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Produced by the Planning Policy Team

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Introduction

The purpose of this Planning Advice Note (PAN) is to provide interim guidance for applicants and decision makers on how biodiversity should be taken into account within development proposals in accordance with the Woking Core Strategy and the National Planning Policy Framework (NPPF).

This advice note builds on existing development plan policies to account for updates to the Environment Act 2021 and to prepare for upcoming legislation mandating 10% biodiversity net gain (BNG). It therefore forms a material consideration that should be taken into account by decision makers when determining planning applications. This advice does not address all aspects of biodiversity within the planning system but seeks to aid applicants and their ecologists in their approach to BNG.

The council currently does not have a Local Plan Policy which requires 10% BNG and has no mechanism to secure BNG in advance of the effective date of its introduction. Therefore, the requirement will be enforced through details within the Environment Act 2021.

Please note that this document is considered a 'live' document and will be updated as further information is made available.

What is Biodiversity Net Gain (BNG)?

Biodiversity net gain (BNG) is an approach to development that leaves biodiversity **in a better state than before** ([CIEEM](#), 2019). Within the context of the planning system, a development that loses habitats within its site boundary, which are not replaced adequately, will contribute to a BNG loss. However, a development which provides more habitats than those that are lost will generally contribute towards a net gain in biodiversity.

BNG seeks to leave a lasting positive impact on the environment, enabling the enhancement and improvement of biodiversity through habitat creation or enhancement after avoiding or mitigating harm. Through legislation the planning system will become a mechanism to ensure BNG is created and managed in the hopes of reversing the decline in biodiversity across the country.

Where BNG is successfully incorporated into the design of a development it can be an asset to the local community as well as to wildlife. Therefore, achieving net gain on site will be particularly important in areas with a lower provision of biodiversity and/or green infrastructure.

Why 10% BNG?

The requirement for 10% BNG on all sites (with exceptions) is specified within the Environment Act 2021 schedule 7A part 1, and states¹:

"Biodiversity gain objective

(1) The biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.

(2) The biodiversity value attributable to the development is the total of—

¹ [Environment Act 2021 \(legislation.gov.uk\)](#)

- (a) the post-development biodiversity value of the onsite habitat,*
- (b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and*
- (c) the biodiversity value of any biodiversity credits purchased for the development.*

(3) The relevant percentage is 10%.

(4) The Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.”

Major development will need to provide a provision of 10% BNG from 12th February 2024 and the same will apply to minor development (small sites) from 2nd April 2024. Any development which proposes BNG well above 10% is encouraged and should further the aims of [Natural Woking](#) and the council’s priorities and actions.

The Council will expect developers to follow the biodiversity gain hierarchy and provide BNG on-site in the first instance. Measures to provide BNG outside of the Borough (or County) should be seen as a last resort².

How is BNG measured?

BNG is measured by comparing the level of biodiversity on site **before** commencement of development, and, **after** development has been completed (over a period of 30 years). This means that development will have to survey the site’s baseline biodiversity value and then also evidence at least a 10% increase in relation to the pre-development biodiversity value of the development granted permission (unless exempt).

To evidence meeting this requirement, Department for the Environment, Farming and Rural Affairs (DEFRA) has developed a standardised metric for developers which enables all habitat recorded to be quantified into measurable BNG. This metric provides a transparent and clear method for achieving net gain requirements and will be used to establish agreements between the council and developer.

When completed correctly, the metric enables practitioners to calculate the potential biodiversity losses and gains associated with a development proposal according to certain considerations, including;

- condition of habitat; a measure of the habitat against its ecological optimum state.
- strategic significance; describes the local significance of the habitat based on its location and the habitat type.
- distinctiveness; a measure based on the type of habitat and it’s distinguishing features, with consideration for designations and rarity.
- spatial risk; represents the relationship between the location of biodiversity loss (on-site) and where off-site habitat is located. This applies to off-site interventions only.

² Refer to para 186 (a) of the NPPF for details on how development must not result in significant harm to biodiversity.

- timeline and risks; the average amount of time it takes to between starting the creation/enhancement of habitats and that habitat reaching its target condition or distinctiveness.

Information recorded within the metric is translated into biodiversity units which enables developers to assess whether gain on site has been achieved after development in comparison to before i.e., uplift from baseline. A minimum of 10% BNG will be required for the development, and this can be delivered on site, off-site (or a mixture of the two) or by purchasing statutory BNG credits. How the development is achieving 10% BNG should be clearly evidenced both within the submitted metric and wider planning application – see requirements for developers below.

The metric produced by Natural England will become statutory upon commencement of mandatory BNG. Developers will be expected to use the latest version of the Statutory metric (draft) published by Natural England.

For more information on the Natural England metric please refer to the user guide available [here](#).

Please note that BNG should be evidenced as additional to other legal and policy requirements. For example, other mitigation measures such as [suitable alternative natural greenspace](#) (SANG), environmental protections (i.e., SSSI, protected flora and fauna species) and opportunities (i.e., [the Woking Great Crested Newt District Level Licensing Scheme](#)) will also need to be considered throughout the planning process.

Significant BNG/off-site BNG provision will not be acceptable on sites with existing national or international conservation designations (e.g., SSSI's, SACs and SPAs³) as there are existing requirements to ensure they are maintained in a favourable condition.

Please refer to the [Thames Basin Heath Special Protection Area Guidance](#) for information on mitigation requirements for development within the vicinity of the TBHSPA.

Trading Rules of the Statutory Metric must be followed.

Where unauthorised degradation⁴ of the onsite habitat has taken place between 30 January 2020 and the date of the submission of the planning application, the biodiversity pre-development value of the onsite habitat is the biodiversity value of the habitat immediately before the carrying out of these degradation activities. The relevant date should therefore be set as a date immediately before these activities.

Unauthorised degradation of onsite habitat is any degradation which is not in accordance with a previous planning permission.

If there has been unauthorised degradation and there is insufficient evidence about the biodiversity value of the onsite habitat immediately before the degradation, the pre-development biodiversity value of the onsite habitat must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it.

³ Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), Special Protection Areas (SPA)

⁴ Refer to Glossary

When will 10% BNG become mandatory?

From the 12th February 2024 BNG will apply to major applications on:

- **residential development** where the number of dwellings is more than 10, or if this is unknown, the site area is more than 0.5 hectares
- **commercial development** where floor space created is more than 1,000 square metres or total site area is more than 1 hectare
- **any non-residential development** of more than 1 hectare

From the 2nd April 2024 BNG will apply to minor development (small sites) on:

- **residential development** where the number of dwellings is between 1 and 9, or if this is unknown, the site area is less than 0.5 hectares
- **commercial development** where floor space created is less than 1,000 square metres or total site area is less than 1 hectare

Exemptions to BNG

The following types of development are exempt from BNG⁵:

- Development which only impacts on onsite habitat with a biodiversity value of zero (e.g., entirely hardstanding);
- Development affecting very small areas of habitat (<25m² or 5m linear habitats);
- Householder applications;
- Small scale self/custom house builds;
- Sites being enhanced for wildlife, such as BNG projects;
- Developments affecting irreplaceable habitats; and
- Permitted development.

Please note the following types of development are not exempt from BNG:

- Developments on previously developed land (PDL) i.e., brownfield sites
- Change of use
- Temporary applications
- Developments on statutory protected sites
- Outline applications/Phased development

Securing BNG for 30 years

Proposals that deliver off-site BNG or significant on-site BNG will need a legal agreement (i.e., Section 106 or conservation covenant) to secure the enhancement and/or maintenance of habitat for 30 years.

The way BNG will be managed and achieved over the 30-year period must be set out and consistent within submitted biodiversity documents (e.g., biodiversity statement and biodiversity gain plan) and clearly demonstrate how providing a provision of 10% BNG is considered achievable.

⁵ Please see here: [Biodiversity net gain: exempt developments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments)

If required, the council will set any specific and proportionate monitoring requirements as part of planning conditions and obligations used to secure significant on-site habitat enhancements.

Responsibility for the management and monitoring for off-site units falls to the third-party deliverer of the habitat bank or credit system.

What is considered 'Significant' for on-site BNG?

Significant enhancements are areas of habitat enhancement which contribute significantly to the proposed development's BNG, relative to the biodiversity value before development. Please note that significant is considered in relation to the 'gain' rather than the 'habitat'.

Retention of existing habitat does not count as an on-site enhancement.

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

- Retained habitat which are being enhanced;
- Habitats of medium or higher distinctiveness in the biodiversity metric;
- Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- Areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- Enhancements to habitat condition, for example from poor or moderate to good;

Example of significant enhancements include creating a wildflower meadow, new native woodlands, blue infrastructure (SuDS, wetlands, ponds) or nature parks.

Application Guidance

The council advises that developers consult early on proposals that have the potential to present challenging circumstances or where developers are unsure of BNG implications. For information about the pre-application service provided by the council please see [here](#)

At pre-application stage:

Early considerations for developers:

- Have you consulted a suitably qualified ecologist?
- Have you referred to the mitigation hierarchy⁶ and developed a biodiversity strategy for your site?
- Do you think your proposal may qualify for [exemption](#)?
- Have you begun drafting a biodiversity statement? Has this been shared with the council?
- Will you need to go off-site (buy units from habitat bank or biodiversity credit scheme)?

It is strongly recommended that developers assess the feasibility of a biodiversity net gain strategy at this stage and consult with a suitably qualified ecologist. Early engagement with the council is advised to enable a strategy and approach to be agreed early on, and to ensure potential impacts are considered (e.g., strategic Significance, bespoke compensation for irreplaceable Habitat, other mitigation measures if needed).

Although not required at this stage it is beneficial if the pre-development biodiversity value and plan is provided.

Phased Development

- For outlined applications and phased development, the BNG statement should set out how biodiversity gain will be achieved across the whole site on a phase-by-phase basis.
- The council will only apply BNG requirement to S73 variations where the original permission was granted after commencement of mandatory BNG in February 2024.
- There will be the requirement as per the general biodiversity gain condition to secure a biodiversity gain plan prior to the commencement of each phase of development.

See the planning practice guidance for more information, available [here](#).

⁶ See Glossary



At planning application stage:

Information that must be submitted alongside the application:

- A Biodiversity statement
- Pre-development and Post-development biodiversity value (Metric spreadsheets)
- Pre-development biodiversity on-site plan
- Proposed biodiversity on-site plan (unless claiming exemption)
- Proposed biodiversity off-site plan (if relevant)

Biodiversity statement: Developers should submit a statement which outlines the general strategy for their site and how BNG will be achieved over the 30-year period.

It is the responsibility of the developer to inform the LPA on whether they are liable for BNG (major or minor development) or qualify for exemption. If claiming exemption, the statement should be used to outline why the proposal meets the criteria specified within the [PPG](#).

The statement should also be used to detail the delivery of any off-site BNG and outline if any external providers (e.g., habitat banks, national credit scheme, any other offset providers) are being used to contribute all or partially towards meeting the 10% requirement.

Pre-development and Post-development biodiversity value (Metric spreadsheets): Developers should use the DEFRA approved biodiversity metric (with associated spreadsheets) to evidence the pre-development (i.e., baseline) value and the proposed net gains (see [Statutory metric](#)).

A small sites metric (SSM) is available for proposals that fall within the SSM definition ([see here](#)). Please note the small sites metric is a simplified version of the main metric and is only suitable for sites of a certain size and development type using a limited list of habitats ([see SSM here](#)). The main Metric must be used to assess all proposed off-site BNG and significant on-site delivery.

The Metric spreadsheets must be completed by a 'competent' person⁷.

A 'competent' person is not required to complete the SSM, however the council strongly advises that a ecologist is consulted where habitat cannot be identified or where there is a likelihood of protected species on site.

Pre-development biodiversity on-site plan: This must be drawn to appropriate scale and show the baseline on-site habitat which aligns with the 'Metric spreadsheets'.

Proposed biodiversity on-site plan (unless claiming exemption): This must be drawn to appropriate scale and show the proposed on-site habitat which will contribute toward meeting net gain. This plan should align with the 'Metric spreadsheets'.

⁷ See Glossary

Before commencement of development:

Information that must be submitted before commencement:

- Biodiversity gain plan
- Habitat Management and Monitoring Plan (HMMP)

Biodiversity gain plan: Where planning permission is granted, the general [biodiversity gain condition](#) (GBGC) will be automatically imposed requiring the submission of a biodiversity gain plan to provide full details detailing how 10% BNG is being delivered. This information is not needed at application stage but will be needed to support a S106 or other legal agreement such as a conservation covenant. Applicants are welcome to submit a draft biodiversity gain plan at the application stage, as this may enable relevant conditions to be discharged more quickly.

To fulfil the GBGC, the biodiversity gain plan should cover the following:

- the baselines (units and hectares / sqm) i.e., pre-development value
- the predicted gains / losses (units and hectares / sqm)
- the area change (units) and percentage change (%),
- the steps taken to minimise adverse biodiversity impacts;
- maps showing clearly where the habitat units occur both pre-development (baseline) and post development (habitat retained, enhanced, and created)

DEFRA provide a Biodiversity gain plan template to complete, [available here](#).

Habitat Management and Monitoring Plan (HMMP): For development that is delivering significant on-site gains a HMMP should be submitted alongside the final Biodiversity gain plan, see further information on HMMPs [here](#). Also refer to CIEEM's Biodiversity Net Gain Report & Audit Templates available [here](#) for further guidance on the managing of the BNG process.



Compliance with biodiversity policy

Within supporting BNG documentation there should be clear evidence of how the biodiversity gain hierarchy has been considered⁸. Please refer to the *Good Practice Principles for Development Guide* (CIEEM, 2019) available [here](#) which is applicable for development of all types/scales and is relevant to developers (and other stakeholders) looking to promote and deliver BNG.

The council advises that proposals evidence how full consideration has been given to the ecological functionality of the existing site, to ensure all existing value for biodiversity is incorporated into site designs, and that consideration has also been given to the on-site options for linking existing ecological networks (i.e., wildlife corridors, SANGs, LNRS, linear habitats, SSSIs) see policies [CS7](#), [DM1 and DM2](#).

In keeping with national policy, NPPF Chapter 15 'Conserving and enhancing the natural environment' should be consulted throughout planning application process when demonstrating compliance with BNG.

Statutory BNG Credits

In cases where it is justified that BNG cannot be achieved on-site, and units provided by third party habitat banks are unavailable, then, as a last resort, statutory credits can be bought from the biodiversity credits scheme to offset requirements – see [here](#) for information on pricing for statutory credits. Natural England has been appointed under the Secretary of State as the provider of statutory biodiversity credits which will be available from commencement of BNG.

National Off-site Gains Register

All sites that deliver off-site BNG need to be registered on the [national register](#). It will be the developer's responsibility to ensure that the site is both secured and registered. The council will approve details pursuant to the planning condition (e.g., receipt from site register). Note that the council may ask for further evidence that demonstrates sites are legitimate to ensure procurement processes are accountable and transparent. See [here](#) for more information.

Development that is delivering BNG on-site is not required to register, as this is not mandated under current legislation or policy.

Enhanced biodiversity duty

The council is responsible for monitoring the delivery of biodiversity on sites within the Borough and will publish monitoring reports every 5 years to enable developers and the public to track the progress of biodiversity creation and enhancement across Woking. This will feed into the government's wider mapping and reporting of habitat improvement across England through the [Local Nature Recovery Strategies \(LNRS\)](#).

⁸ See [here](#) for full details on the biodiversity gain hierarchy set within legislation.

Glossary

Term	Definition
Adaptation	The process of adjustment in a design or operational procedure to respond to the projected impacts of climate change, in order to moderate harm or exploit beneficial opportunities.
Biodiversity	The variety of life on Earth, including plants, animals and micro-organisms which, together, interact in complex ways with the inanimate environment to create living ecosystems. The Borough's biodiversity and green infrastructure strategy Natural Working Strategy (2016) sets the following definition of biodiversity: <i>"Biodiversity encompasses all living things and the rich variety of habitats, species and ecosystems of which they are a part. It is not restricted to rare or threatened habitats and species but includes the whole of the natural world from the common place to the critically endangered."</i>
Biodiversity Net Gain (BNG)	CIEEM outlines, <i>"BNG is an approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity it encourages developers to provide an increase in appropriate natural habitat and ecological features over and above that being affected in such a way it is hoped that the current loss of biodiversity through development will be halted and ecological networks can be restored"</i> .
Biodiversity Gain Hierarchy	Three steps within DEFRA guidance that developers must follow in order to determine how 10% BNG will be delivered. See here for more information.
Biodiversity Gain Objective	The PPG states 'every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition (GBGC) to secure the biodiversity gain objective.' This is set out within the Environment Act 2021, and outlines requirements for development for which planning permission is granted to exceed the pre-development biodiversity value by 10%.
Biodiversity Gain Plan	The biodiversity gain plan is a document that sets out how a development will deliver BNG and enables the council to check whether proposals meet the biodiversity gain objective. Development subject to mandatory BNG will need to submit a biodiversity gain plan for approval by the council. The council will need to approve the plan prior to commencement.

According to the Environment Act 2021 (see [Schedule 14 of the Environment Act](#)) a biodiversity gain plan should include the following:

- (a) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat,*
- (b) the pre-development biodiversity value of the onsite habitat,*
- (c) the post-development biodiversity value of the onsite habitat,*

(d) any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development,

(e) any biodiversity credits purchased for the development, and

(f) such other matters as the Secretary of State may by regulations specify (i.e., reflect further changes in legislation).

CIEEM	Chartered Institute of Ecology and Environmental Management. Please refer to CIEEM's Good Practice principles/guidance on BNG available here .
Climate Change	<p>The UNFCCC, in its Article 1, defines climate change as: "a change of climate which is attributed directly or indirectly to human activity that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods".</p> <p>While climate change can be attributable to natural causes, the UNFCCC distinguish climate change as related to human activities altering the atmospheric composition and climate variability.</p> <p>Also see here for information on the council's approach to addressing climate change within Woking.</p>
Competent person	For major development and proposals delivering off-site BNG a qualified ecologist is required to assess biodiversity documentation. The council advises that developers use CIEEM to find an suitable ecologist or practice. See here for more information.
Conservation Covenants	Conservation covenants are private voluntary agreements between a 'responsible body' and a landowner to fulfil duties tied to their land for conservation purposes (e.g., ecological, historic, archaeological).
Degradation	A process where the condition of a site is made worse or 'degrades' over time. The Environment Act 2021 allows the council to recognise any habitat degradation since 30th January 2020 and to take the earlier habitat state as the baseline for the purposes of BNG. For example, where a site has been deliberately degraded for the purposes of BNG the council is able to use earlier records of the site's condition as the baseline and ask for the appropriate compensation.
Department for the Environment, Food and Rural Affairs (DEFRA)	Department of central government responsible for policy and legislation relating to environmental, food and rural issues. DEFRA implement legislation (e.g., Environment Act 2021) to enable the delivery of mandatory BNG within the planning system through the biodiversity condition.
General Biodiversity Gain Condition (GBGC)	The Environment Act 2021 sets out a general condition to be applied to all planning permission (except where exemptions apply) to have a biodiversity gain plan submitted and approved by the council before the commencement of development.
Green and Blue Infrastructure	A network of nature-based features based on vegetation (green), water (blue), or both, integrated into typically grey infrastructure development.
Mitigation Hierarchy	<p>A set of principles to enable BNG loss to be adequately compensated for, as follows: avoid; minimise; remediate; compensate.</p> <p>Also set out within NPPF para 186 a) ... "If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an</p>

	<p>alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”</p> <p>Both the mitigation and biodiversity gain hierarchy should be consulted. Note that the biodiversity gain hierarchy is outlined within The Biodiversity Gain (Town and County Planning) (Modifications and Amendments) (England) Regulations 2024.</p>
National Planning Policy Guidance (NPPF)	Sets out the national framework for planning policy which is a material consideration and is used by decision-makers in determining applications.
Natural Woking Strategy	Published in 2016, the green and blue infrastructure strategy sets out how the council intends to enhance the provision of green spaces, conserve existing biodiversity and habitats and create opportunities for species to return to the borough. See here for information and a full copy of the strategy.
Nature-Based Solutions (NBS)	Nature-based solutions (NBS) is a term to describe how nature, when sustainably managed, can be used as a multi-layered intervention to tackle social, economic, and environmental issues, such as biodiversity loss.
Planning Advice Note (PAN)	Planning Advice Notes (PAN) provide guidance on the implementation of national and local policy. This BNG PAN aids the delivery of CS7 and requirements within the Environment Act 2021 which mandate 10% BNG across development permitted under the TCPA Act 1990.
Planning Practice Guidance (PPG)	The planning practice guidance supplements the NPPF and adds further context on national policies.
Responsible Body	Responsible Bodies (RB) ensure that the requirements of any agreed conservation covenant are secured and are being delivered i.e., management and monitoring arrangements, any mitigation measures or specified enhancement.
Section 106 (S106)	Where development is delivering significant biodiversity gain the council will use legal agreements (likely S106) to secure the management and monitoring of biodiversity gain over 30 years.

Appendix - Legislative and Policy Context

State of Nature Report (2013, 2017 - present)

The State of Nature report documents data on the presence of biodiversity within the UK and shows that human activity (namely development) has resulted in the significant decline of wildlife and endangered species. Since monitoring began in the 1970s, the report has evidenced a 19% decline in the presence of species across the UK. This is in despite of efforts so far to protect them. The report acknowledges that, outside of the remit of 'Protected Areas', there is no mechanism in place to protect biodiversity from development.

25 Year Environment Plan (2018)

The 25 Year Environment Plan sets out the long-term commitment 'to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats'. The plan also sets out the need to create a 'National Recovery Network' which will be supported by the creation of Local Nature Recovery Strategies (LNRS) across England as established by the Environment Act 2021. Development of LNRSs will contribute toward the monitoring and mapping of biodiversity and will enable targeted action and investment in nature. Surrey County Council (SCC) acts as lead authority and has begun work on development of the LNRS. It is anticipated the strategy will take between 13 – 18 months to complete. Information on the LNRS will be made available on the Woking 2027 policy website. To follow SCC's development of the LNRS please see [here](#).

Biodiversity Opportunity Area (BOAs)

At county level, Biodiversity Opportunity Areas (BOA) and urban BOAs within Surrey have been identified to enable responsible planning authorities to respond to the need to protect and manage land considered significant.

Woking is influenced by two BOAs, the 'Thames Basin Heaths Special Protection Area' (TBH SPA) which holds statutory status under European Directive 79/409/EEC (transposed into the UK Habitats Regulations), and the Urban BOA 'UrBOA 05: Byfleet to Woking & Knaphill'. Although details of the urban BOAs are not publicly available, as of the date of this report, they remain a consideration as the nature recovery strategies are developed (see above).

The TBH SPA features heathland (notably 'Lowland' heathland) rarely found across the UK. Development, so far, has fragmented the extent of heathland habitat and so it is considered vital that what remains is adequately protected and restored.

To mitigate against the negative effect of development in proximity to the TBH SPA, policy CS8 of the Core Strategy sets out how the council must take a precautionary approach to the protection and conservation of the SPA. Under policy CS8, new residential development is required to demonstrate adequate mitigation measures, based on the proximity and likelihood of there being a significant effect on the purpose and integrity of the TBH SPA. Development that fall within CS8 criteria is required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM). Details of how the contribution apply are set out in the Council's Thames Basin Heaths Special Protection Area Avoidance Strategy SPD - see [here](#) for details. Also see [here](#) for information from Surrey Wildlife Trust on protected wildlife sites in Surrey.

National Planning Policy Framework (NPPF, 2023)

The [NPPF](#) establishes three objectives for the planning system to follow and contribute towards achieving 'sustainable development'. These three overarching objectives (economic, social, environmental) are intended to be delivered through the preparation and implementation of plans and the application of NPPF policies. In particular, the 'environmental objective' states planning policy should protect and enhance the natural environment, including improving biodiversity.

Para 180 (d) states planning policies and decisions should contribute toward enhancement by...

"Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures."

Para 185 (b) states plans should....

"Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

Para 186 states the following principles should apply...

(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"*

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".*

Core Strategy (2012)

The Core Strategy (2012) provides policy and guidance that protect the Borough's diverse habitats, biodiversity, geodiversity, heritage, Green Belt and protects designations such as conservation areas, historic landscapes and Sites of Special Scientific Interest (SSSI).

Policy CS7 Biodiversity and nature conservation outlines....

"It will require development proposals to contribute to the enhancement of existing biodiversity and geodiversity features and also explore opportunities to create and manage new ones where it is appropriate..."

and

"The Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces, where appropriate, and the creation of linkages between sites to create a local and regional biodiversity network of wildlife corridors and green infrastructure. It will seek to retain and encourage the enhancement of significant features of nature conservation value on development sites..."

Development Management Policies (2016)

Policy DM1 Green Infrastructure Opportunities states...

“New green infrastructure assets required to support development and the general community will be expected to be designed and located to maximize the range of green infrastructure functions and benefits”

Noting that proposals which introduce new or enhanced green infrastructure assets are required to evidence the...

“Management and maintenance arrangements that will be put in place to ensure the sustainable long-term care for the asset”

Policy DM2 Trees and Landscaping outlines...

“Trees, hedgerows and other vegetation of amenity and/or environmental significance or which form part of the intrinsic character of an area must be considered holistically as part of the landscaping treatment of new development”

Appendix – Workflow diagram for delivering BNG

