



BIODIVERSITY NET GAIN (BNG)

A Plain-English Briefing for
South Swindon Parish Council

1. What is Biodiversity Net Gain?

Biodiversity Net Gain (BNG) is a legal requirement under the Environment Act 2021 that applies to most new developments in England. In simple terms, it means that when something gets built, the natural environment must end up in a measurably better state than before, specifically, at least 10% better.

The “biodiversity” being measured here is habitats. Things like grassland, woodland, hedgerows, ponds, and scrub. The system uses a government calculator (the “statutory biodiversity metric”) to assign a numerical value to habitats based on their type, quality, and size. Before development, you measure what’s there. After development, you measure what will be there. The difference must show at least a 10% uplift.

When did it become mandatory?

12 February 2024: BNG became mandatory for major developments (10+ homes or sites over 1 hectare).

2 April 2024: Extended to small sites (under 10 homes).

May 2026: BNG will apply to Nationally Significant Infrastructure Projects (NSIPs).

Who does it affect?

BNG primarily affects developers submitting planning applications. However, it also creates opportunities for landowners and land managers, including parish councils, who can potentially generate and sell biodiversity units.

2. How Does It Actually Work?

There are three key concepts to understand: the metric, the mitigation hierarchy, and the different ways to deliver BNG.

The Biodiversity Metric

Natural England’s statutory biodiversity metric is an Excel-based calculator. An ecologist surveys a site, records the habitats present, and enters data into the metric. The tool considers three main factors for each habitat:

- **Distinctiveness** – how rare or ecologically valuable the habitat is (rated Very Low to Very High)
- **Condition** – how good the habitat’s quality is compared to its ecological optimum (rated Poor to Good)
- **Strategic significance** – whether it’s in a location identified as important for nature recovery (e.g. in the Local Nature Recovery Strategy)

These factors, multiplied by the area, produce a score in “biodiversity units.” A habitat with high distinctiveness in good condition will score more units per hectare than a patch of scrubby modified grassland in poor condition.

The Mitigation Hierarchy

Developers must follow this order of preference:

1. **On-site first:** Avoid, minimise, and compensate for habitat loss within the development's red-line boundary. Retain what you can, enhance what remains, create new habitats on-site.
2. **Off-site units:** If the 10% gain can't be fully achieved on-site, developers buy off-site biodiversity units from a registered habitat bank or landowner. These must be secured by a legal agreement (usually a S106 or conservation covenant) for a minimum of 30 years.
3. **Statutory credits (last resort):** If neither on-site nor off-site options are available, developers can buy statutory credits directly from the government through Natural England. These are deliberately priced much higher than the private market to discourage their use.

Three Types of Biodiversity Unit

The metric measures three separate types, and you can't swap between them:

- **Area habitat units** – for general habitats like grassland, woodland, lakes, scrub, etc.
- **Hedgerow units** – for linear hedgerow features
- **Watercourse units** – for rivers and streams

3. Key Terminology – A Jargon Buster

Term	What It Means
Biodiversity Unit (BU)	The “currency” of BNG. A numerical score representing the ecological value of a habitat, calculated by the metric.
Statutory Credit	A government-sold credit (via Natural England) used as a last resort. One credit = half a unit, so you need 2 credits per unit shortfall. Very expensive.
Biodiversity Gain Plan	The document a developer submits to the LPA setting out how they will achieve 10% BNG. It's a pre-commencement condition.
HMMP	Habitat Management and Monitoring Plan. Sets out how habitats will be created, enhanced, maintained and monitored over 30+ years.
Habitat Bank	A site where habitat has been created or enhanced, registered on the national register, with units available for developers to purchase.
Spatial Risk Multiplier	A penalty applied when BNG is delivered further from the development site. Statutory credits are hit hardest (doubled).
Distinctiveness	How rare or ecologically valuable a habitat type is. Ranges from Very Low (e.g. developed land) to Very High (e.g. blanket bog).
Condition Assessment	An evaluation of habitat quality against its ecological optimum. A “good” condition grassland scores higher than a “poor” one.
Trading Rules	Rules preventing developers from replacing high-value habitats with lower-value ones. You must replace like-for-like or better.

LPA	Local Planning Authority. In Swindon's case, this is Swindon Borough Council.
LNRS	Local Nature Recovery Strategy. A mapped strategy identifying priority areas and habitats for nature recovery.
NSIP	Nationally Significant Infrastructure Projects. Major projects like power stations, airports, and railways that bypass local council planning to speed up approval
S106 Agreement	A legal agreement under the Town and Country Planning Act that can secure land for habitat delivery for 30 years.
Conservation Covenant	An alternative to S106. A private agreement between a landowner and a "responsible body" to conserve land.
Biodiversity Gain Site Register	The national register (managed by Natural England) where off-site gain sites must be recorded before units can be sold.

4. What Does BNG Cost?

Statutory Credit Prices (Government – Last Resort)

The government publishes credit prices on GOV.UK, reviewed every 6 months. Remember: you need 2 credits per 1 unit shortfall due to the spatial risk multiplier. Current prices per credit (not per unit):

Distinctiveness	Example Habitats	Price per Credit	Tier	Cost per Unit
Low	All low-value habitats	£42,000	A1	£84,000
Medium	Grassland, heathland, urban, cropland, trees	£42,000	A1	£84,000
Medium	Woodland, intertidal sediment	£48,000	A2	£96,000
Medium	Lakes (reservoirs), ponds	£125,000	A4	£250,000
High	Reedbeds, orchards	£42,000	A1	£84,000
High	Lowland calcareous grassland, heathland	£48,000	A2	£96,000
High	Wet woodland, intertidal	£66,000	A3	£132,000
High	Priority ponds, lagoons, mixed woodland	£125,000	A4	£250,000
High	High/low alkalinity lakes	£650,000	A5	£1,300,000
Various	All hedgerows	£44,000	H	£88,000
Various	All watercourses	£230,000	W	£460,000

Source: GOV.UK Statutory Biodiversity Credit Prices (last updated June 2025). VAT is not charged on credits.

Private Market Prices (Off-Site Units)

The private market for off-site BNG units is much cheaper than statutory credits. Current indicative ranges:

- **Off-site area habitat units:** £15,000 – £25,000 per unit (varies by location, habitat type, and local supply)
- Prices have been softening through 2025–2026 as more habitat banks come online, particularly for common habitat types like neutral grassland
- Scarce habitats (lakes, certain wetlands, specialist grasslands) may command higher prices
- Demand is expected to increase significantly when BNG applies to NSIPs from May 2026

5. BNG in Swindon – Local Context

The Planning Authority

Swindon Borough Council is the Local Planning Authority (LPA) for the Swindon area. All BNG matters in planning applications including approval of Biodiversity Gain Plans, acceptance of off-site provision, and monitoring are dealt with by SBC.

Local Plan Policy

The adopted Swindon Local Plan contains Policy EN4 (Biodiversity and Geodiversity), which requires development to avoid negative impacts and, for applicable developments, to provide biodiversity net gain. Since February 2024, the mandatory 10% requirement has superseded any lesser local expectation.

Local Nature Recovery Strategy (LNRS)

The Wiltshire and Swindon LNRS has been formally adopted (October 2025). Led by Wiltshire Council as the responsible authority, it was developed in partnership with Swindon Borough Council, Natural England, the New Forest National Park Authority, and Wiltshire Wildlife Trust among others.

The LNRS is significant for BNG because:

- It maps priority areas for nature recovery across Wiltshire and Swindon
- Habitats located in LNRS priority areas score higher in the metric under “strategic significance,” generating more biodiversity units per hectare
- It will guide where off-site BNG should be directed and help the LPA assess Biodiversity Gain Plans
- Delivery webinars and frameworks are planned for early 2026

The interactive LNRS map is available on the Wiltshire Council ArcGIS portal here - <https://www.arcgis.com/index.html>

What SBC Requires with Planning Applications

For BNG applicable applications, SBC requires:

- A statement confirming whether the development is subject to the biodiversity gain condition
- The pre-development biodiversity value (completed metric calculation)
- The proposed approach to achieving 10% BNG
- A Biodiversity Gain Plan (pre-commencement condition) before development starts
- If off-site: evidence that units or credits have been purchased from a registered source and allocated to the development

Wiltshire & Swindon Biological Records Centre (WSBRC)

Any ecological survey work in the Swindon area should include a data search from the WSBRC. This is the only accepted source of local species records and designated site data for planning applications. The National Biodiversity Network (NBN) is not an acceptable substitute for professional reports.

6. Why Does This Matter to South Swindon Parish Council?

As a Landowner

The council owns and manages significant green infrastructure including formal parks (Town Gardens, Queen's Park, GWR Park, Buckhurst Field), play areas, allotments, open spaces, and community centres with surrounding grounds. Under BNG, this land portfolio has two dimensions:

- **Opportunity:** Council land with potential for habitat enhancement could theoretically be registered as a biodiversity gain site, generating units for sale to developers. This is essentially what a "habitat bank" is.
- **Risk:** Registering land commits the council to a 30-year management obligation secured by legal agreement. The land use is constrained for that period. This needs very careful consideration against the council's wider service delivery needs.

As a Body with the Biodiversity Duty

Under Section 40 of the Natural Environment and Rural Areas Act 2006 (strengthened by the Environment Act 2021), all public authorities must consider what they can do to conserve and enhance biodiversity and must report on actions taken. BNG provides a measurable framework for the council to demonstrate compliance with this duty through its land management practices.

The Queen's Park Lake Example

The ACD Environmental assessment of Queen's Park Lake illustrates how BNG works in practice. The 0.8ha ornamental lake, currently degraded by duckweed, scores 3.84 baseline units. By enhancing it (oxygenating plants, water features, dredging, bacterial treatment), the metric predicts an uplift to 4.135 units – a gain of 0.295 units, or 7.38%. This falls short of the 10% target, partly because the metric applies a "High" difficulty multiplier (0.33) reflecting how hard lake habitats are to improve reliably.

This assessment was not done for a planning application, it was commissioned to understand what ecological improvement is achievable and to provide a framework for managing the lake's restoration. That's a perfectly valid use of the BNG metric as a management tool, separate from any credit-selling ambition.

7. Could the Council Sell BNG Units?

In theory, yes. In practice, there are significant considerations:

What We'd Need to Do

4. **Commission an ecological survey** and biodiversity metric calculation to establish the baseline value of the land
5. **Design habitat enhancements** that would generate a measurable uplift in biodiversity units
6. **Produce a detailed HMMP** covering 30 years of management and monitoring
7. **Secure the land** through a S106 agreement with Swindon Borough Council or a conservation covenant with a responsible body
8. **Register** on Natural England's Biodiversity Gain Site Register
9. **Find buyers** (developers) or work through a habitat bank operator or BNG marketplace
10. **Deliver and maintain** the habitat enhancements for 30 years, with regular monitoring and reporting

Practical Considerations for SSPC

- **Scale:** Most viable habitat banks are tens or hundreds of hectares. The council's green spaces are relatively small and fragmented, which limits the volume of units that could be generated.
- **Primary purpose:** Council parks serve amenity, recreation, and community purposes. A 30-year habitat management obligation could conflict with future plans for play areas, events, café provision, or other community uses.
- **Costs vs revenue:** The upfront costs of surveys, legal agreements, registration, and ongoing monitoring may outweigh the revenue from selling a small number of units.
- **Governance:** Full Council would need to approve any S106 or conservation covenant committing council land for 30 years. This would also require careful legal advice.

8. The BNG Process at a Glance

For a developer submitting a planning application in Swindon:

Step	What Happens
1	Commission an ecologist to survey the site and calculate the baseline biodiversity value using the statutory metric
2	Design the development to retain as much habitat as possible and create/enhance habitats on-site
3	Run the metric to see if it can achieve 10% net gain on-site

4	If not, source off-site units from a registered habitat bank (check local availability first)
5	If off-site units unavailable, apply to purchase statutory credits from Natural England (must prove you tried steps 3–4)
6	Submit the completed metric and BNG strategy with the planning application to SBC
7	If permission granted, prepare and submit a Biodiversity Gain Plan for approval before starting work
8	Deliver and maintain all BNG habitats for at least 30 years

9. What's Exempt from BNG?

Not everything requires BNG. Key exemptions include:

- Planning applications submitted before 12 February 2024
- Householder applications (extensions, loft conversions, etc.)
- Small self-build and custom-build developments
- Permitted development (where no planning application is needed)
- De minimis: development not impacting a priority habitat and impacting less than 25 square metres
- Certain variations to existing planning permissions (S73/S73A in some cases)

10. Local BNG Surveyors and Ecologists

The following ecological consultancies operate in the Swindon and Wiltshire area and offer BNG assessment services. This list is not exhaustive and inclusion does not constitute a recommendation. The council should obtain competitive quotes and check CIEEM membership and relevant experience.

Consultancy	Notes	Website
ACD Environmental	Prepared the Queen's Park HMMP and metric. CIEEM Registered Practice. Based in the South West.	acdenvironmental.co.uk
Daniel Ahern Ecology	Local Swindon-area ecologist with BNG experience. Has worked with Swindon Borough Council on translocation projects.	danielahernecology.co.uk
Collington Winter Environmental	Independent consultancy with Swindon experience. Pragmatic approach to BNG for developers and landowners.	collingtonwinter.com
Arbtech	National consultancy with local Swindon surveyors. Wide range of ecology and BNG services.	arbtech.co.uk
BiOME Consulting	CIEEM Registered Practice with staff based in Wiltshire. Experience in habitat classification and BNG metrics.	biomeconsulting.com

Wiltshire Wildlife Trust	Offers environmental consultancy. Also involved in off-site BNG delivery and the LNRS. Can advise on habitat banking.	wiltshirewildlife.org
CW Habitats (Collington Winter)	Specialist BNG arm. Focuses on habitat creation, habitat banking and off-site BNG solutions.	cwhabitats.co.uk

To find additional CIEEM-registered ecologists in the area, search the CIEEM membership directory at cieem.net. Wiltshire Council also recommends using full CIEEM members for planning-related ecological work.

11. Key Resources and Links

Resource	URL / Details
GOV.UK – Understanding BNG	www.gov.uk/guidance/understanding-biodiversity-net-gain
GOV.UK – Statutory Credit Prices	www.gov.uk/guidance/statutory-biodiversity-credit-prices
GOV.UK – Sell Biodiversity Units	www.gov.uk/guidance/sell-biodiversity-units-as-a-land-manager
GOV.UK – Statutory Biodiversity Metric Tool	Available for download from the GOV.UK biodiversity metric page here - https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides
Swindon Borough Council – BNG Page	swindon.gov.uk (Planning > Habitats, Ecology and Biodiversity > BNG)
Swindon Local Plan Policy EN4	Available in the adopted Swindon Borough Local Plan 2026
Wiltshire & Swindon LNRS	www.wiltshire.gov.uk/article/8288 and ArcGIS interactive map
Wiltshire & Swindon Biological Records Centre	www.wsbrc.org.uk – essential for data searches
CIEEM Ecologist Directory	www.cieem.net/directory
Biodiversity Gain Sites Register	Managed by Natural England – for registration of off-site gain sites
Natural England BNG Enquiries	biodiversitynetgainenquiries@naturalengland.org.uk

Disclaimer

This guide is intended as an accessible overview for internal briefing purposes only. It does not constitute legal, ecological, or financial advice. BNG is a rapidly evolving area of law and practice, specific decisions should be informed by professional ecological and legal advice. Prices and policy details were current at the time of preparation (March 2026) but are subject to change.