WILD FRONTIER ECOLOGY

Land Adjacent 39 Hall Hill Road, Holbeach



Biodiversity Statement

March 2026

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The data which we have prepared and provided is accurate and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. We confirm that any opinions expressed are our best and professional bona fide opinions.

This report conforms to the British Standard 42020:2013 Biodiversity - Code of practice for planning and development & BS 8683:2021 Process for designing and implementing Biodiversity Net Gain

This report contains advice for achieving Biodiversity Net Gain (BNG). This advice does not constitute a design for BNG. In submitting this advice, Wild Frontier Ecology has no Design Liability associated with this advice for BNG.

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1. Non-Technical Summary

Wild Frontier Ecology Ltd. was commissioned to undertake a Biodiversity Net Gain assessment of a proposed development at Land adjacent 39 Hall Hill Road, Holbeach, Lincolnshire. The assessment is based on a desk study and UK Habitat survey.

The site is urban and comprises built environment (buildings, hardstanding and gravel) with an area of modified grassland in the north. There are three small trees located between the buildings, and a non-native hedgerow on the eastern site boundary. There are no watercourses and no irreplaceable habitats on site.

The baseline Biodiversity Units of the site are **0.12** 'Habitat' units and **0.03** 'hedgerow' units. Post-intervention, the development as proposed will result in a net increase of **0.16** 'Habitat' units **(+136%)** and **0.09** 'Hedgerow' units **(335%).** This Biodiversity Statement has shown that BNG targets of 10% are capable of being met under the current design.

A Habitat Management and Monitoring Plan (HMMP) will need to be produced once planning permission has been secured. The HMMP will provide detailed habitat establishment and management advice over the full 30-year legal requirement of BNG. A legal agreement will be required to secure any significant enhancements over this 30-year period.

2. Introduction

2.1 Background

Wild Frontier Ecology Ltd. (WFE) was commissioned by Gaskin Property Group Ltd. to undertake a Biodiversity Net Gain (BNG) assessment for a proposed development on land adjacent 39 Hall Hill Road, Holbeach, Lincolnshire. The site is centred on approximate National Grid Reference TF 3554 2451.

The proposal is for the construction of two detached, single-storey two-bedroom dwellings following the demolition of the existing garages, creation of associated access including vehicle access and a path, parking and associated gardens. The plans include some scope for soft landscaping. The site location, existing site layout and proposed development plans are shown in Figures 1, 2 and 3 below.

An Ecological Assessment for this development was undertaken by WFE in March 2026[1].

2.2 Objectives

The primary objective of this document is to present the findings of the baseline and post-intervention BNG calculations associated with this proposed development. Additionally, an assessment is provided on whether meeting a gain of 10% is feasible on site. This document should be read in conjunction with the submitted Statutory Metric Calculation Tool spreadsheet and Condition Assessment Spreadsheet.

2.3 Basis for Assessment

This assessment is based on information and plans (Figure 3) provided by Alexandra Design on 19th February 2026.

2.4 Relevant Policy & Legislation

A summary of relevant policy can be found in Appendix A.

2.5 Statement of Competency

This BNG assessment has been undertaken by Jessie Prentice BSc who is an Assistant Ecologist for WFE, with previous positions in practical conservation. Jessie's experience includes undertaking habitat surveys and assessments across East Anglia. Jessie has received in-house training on the Biodiversity Net Gain metric from senior WFE staff and since starting at WFE she has been involved in a number of BNG assessments.

This BNG assessment has been checked by Ptolemy McKinnon BSc MSc ACIEEM, an Ecologist at WFE. P. McKinnon has received in-house training on the CIEEM Statutory Biodiversity Metric from senior WFE staff and has attended training courses on Version 2 of the metric. P. McKinnon regularly conducts Biodiversity Net Gain assessments.

This report has been authorised by Justin Parry BSc (Hons) who is a Senior Ecologist at Wild Frontier Ecology with over five years' experience in consultancy and an Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM). J. Parry has also undertaken several BNG assessments. Both internal and external BNG/UKHab classification training has been completed, including the 'Introduction to UK Habitat Classification' and 'Using UKHab for Biodiversity Net Gain' course provided by

[1] Wild Frontier Ecology Ltd., Land Adjacent to 39 Hall Hill Road, Holbeach, Ecology Report, March 2026

CIEEM in 2021 and 2025 respectively. J. Parry holds a 'Level 5' Field Identification Skills Certificate, awarded by the Botanical Society of Britain and Ireland, and is also a qualified River Condition Assessment surveyor.

Figure 1. Site location



Figure 2. Aerial image of the site



Figure 3: Existing and proposed site layout (as provided by Alexandra Design)



3. Assessment Methods

3.1 Desk Study

3.1.1 GIS Data

Publicly available maps and aerial photographs, such as on Google Earth Pro™, were consulted for site context and history. The Multi-Agency Geographic Information for the Countryside (MAGIC)[2] online mapping tool (which is managed by Natural England) was reviewed to help identify any priority habitats on or near the site.

3.1.2 Strategic Significance

The Local Nature Recovery Strategy (LNRS)[3] for Norfolk has been used to determine the strategic significance of post-development habitats. The LNRS identifies areas where habitat creation or enhancement aligns with local conservation priorities. When calculating biodiversity units using the DEFRA Metric, habitats located within LNRS priority areas may receive a higher strategic significance multiplier if they align with these priorities. This multiplier increases the number of biodiversity units generated by habitat creation or enhancement, making it more valuable in the BNG calculation.

3.2 Field Data

Field data is based on a UK Habitat (UKHab) survey completed on 18th December 2025. The survey was completed by Philip Farndon BSc ACIEEM in accordance with relevant guidance[4]. Data on habitat condition were recorded during the UKHab survey. Technical information on the UKHab classification system, which forms the basis for BNG, is available in Appendix A.

3.3 Mapping & Calculations

Mapping and BNG calculations were undertaken by Ptolemy McKinnon BSc MSc ACIEEM and J. Prentice. Habitat field data was mapped using Quantum GIS (QGIS). UKHab definitions were translated into the DEFRA Statutory Biodiversity Metric categories as per the Statutory Biodiversity Metric Technical Annex[5]. Habitat condition and distinctiveness were assessed using habitat-specific criteria from the technical annex. The baseline and post-intervention (proposed) BNG units were then calculated accordingly. QGIS data was imported using the Statutory Biodiversity Metric GIS import tool into the Statutory Biodiversity Metric Calculation Tool[6]. The version of the Statutory Biodiversity Metric Calculation Tool used was published 3rd July 2025.

Area and length data is automatically entered in at four decimal places. If there are deviations from this, it will be noted in this report. If rounding is required, according to best practice, baseline figures will be rounded up to the nearest relevant decimal place, and proposed scheme measurements will be rounded down. This is so valued habitat at

[2] DEFRA (2026), 'MAGIC Maps'. Available at https://magic.defra.gov.uk/MagicMap.aspx.
[3] Norfolk County Council (2026), 'Local Nature Recovery Strategy'. Available at https://www.norfolk.gov.uk/73317
[4] UK Habitat Ltd. (2026), *UK Habitat Classification Version 2.0*. Available at https://www.ukhab.org.
[5] Statutory Biodiversity Metric - Technical Annex 1 (First published February 2024). Natural England Joint Publication JP039. http://www.gov.uk/natural-england.
[6] DEFRA (2024), 'The Statutory Biodiversity Metric'. Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides.

baseline is not deflated in value artificially, and likewise the value of proposed habitats are not inflated.

A Minimum Mapping Unit (MMU) of 25 square metres (m^2) for area habitats and five metres (m) for linear habitats is used, in line with UKHab guidelines[7]. There are three separate categories within the Metric: 'Habitats' (i.e. area habitats; individual trees are included here), 'Hedgerows' (i.e. linear habitats such as hedgerows) and 'Watercourses'. The units for these categories are calculated separately and cannot be equated.

For this scheme, there are no existing or proposed 'watercourse' features, so no calculation of this category is provided.

All values provided in the assessment are to two decimal places, which can explain minor rounding discrepancies in the Metric's output.

Based on communication with the client, a 1-year construction period is anticipated. Therefore, there will be an according 1-year delay in the commencement of creation or enhancement of habitats relative to their removal/loss.

3.4 BNG Good Practice Principles

BNG principles[8] have been applied throughout this report; these are listed in Appendix B.

3.5 BNG Metric Principles

This report conforms to the Biodiversity Metric Principles[9] outlined in Appendix C.

[7] UKHab Ltd (2024), 'The UK Habitat Classification User Manual Version 2.0'. Available at https://ukhab.org/.

[8] Baker, J, Hoskin, R, Butterworth, T Biodiversity Net Gain. Good practice principles for development. Part A: a practical guide. CIRA 2019 ISBN:987-0-86017-791-3.

[9] Statutory Biodiversity Metric - User Guide (February 2024). Natural England Joint Publication JP039https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf

4. Biodiversity Net Gain Assessment

Technical terms for UKHab classifications are listed in bold and italic text. The baseline calculation results are provided in Tables 1 and 2. Baseline habitats are mapped in Figure 4. Full species lists and photographs are available in the associated Ecology Report. There is no irreplaceable habitat on site.

4.1 Habitat (Area Features) Baseline

Total habitat area: 0.13ha

Site area (excluding area of individual trees): 0.11ha

There are two garage blocks onsite, classified as ***u1b5 Buildings***. An area of hardstanding surrounding these buildings is classified as ***u1b Developed land; sealed surface***. The remainder of the site mostly comprises gravel, classified as ***u1c Artificial unvegetated, unsealed surface***. In the north-west of the site there is an area of ***g4 Modified grassland*** in 'poor' condition.

There are three small (diameter at breast height >7.5cm and ≤30cm) 'urban trees' between the two garage blocks, referenced T1-T3. T1 and T3 are both sycamores *Acer pseudoplatanus* in 'poor' condition and T2 is an elder *Sambucus nigra* in 'moderate' condition. Individual trees are classified as ***u1b Developed land; sealed surface*** with the secondary code ***200 Tree***.

4.2 Hedgerow (Linear Features) Baseline

Total hedgerow length: 0.027km

There is one ornamental hedgerow on the north-eastern site boundary which entirely comprises non-native species (H1 in Figure 4). This is classified as ***h2b Ornamental and non-native hedgerow*** and is automatically assigned 'poor' condition.

4.3 Constraints

The Extended Habitat survey was conducted during the winter period and therefore certain plant species, such as many annuals, may have been absent at the time of the survey. However, given the number and type of species that were recorded and the context of the habitat being amenity grassland in an urban environment, this is not considered to have significantly impeded the classification of the habitats and their condition found within the proposed development area.

Table 1. On-Site Habitat Baseline Units[10]. The Metric assigns values by default to the cells shaded grey.

Habitat Type	Area (ha)	Distinctiveness	Condition	Strategic Significance	Units
Modified grassland	0.0272	Low	Poor	Area/compensation not in local strategy/ no local strategy	0.05
Artificial unvegetated, unsealed surface	0.0768	V. Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	0.00
Developed land; sealed surface	0.0171	V. Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	0.00
Urban tree (T1 and T3)	0.0081	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.03
Urban tree (T2)	0.0041	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.03
				Total units	**0.12**

Table 2. On-Site Hedge Baseline Units. The Metric assigns values by default to the cells shaded grey.

Habitat Type	Lenth (km)	Distinctiveness	Condition	Strategic Significance	Units
Non-native and ornamental hedgerow	0.027	V. Low	Poor	Area/compensation not in local strategy/ no local strategy	0.03
				Total units	**0.03**

[10] Any discrepancies in total values versus the values above are due to rounding in the Metric calculation. This value has been cross-checked.

Figure 4. Baseline UK Habitat map



4.4 Post-Intervention Habitats

The post-intervention enhancement and loss calculations are provided in Tables 3 and 4 below. Calculations of post-intervention habitat and hedgerow units created are described in Tables 5 and 6. Post-intervention habitats are represented spatially in Figure 5.

Post-intervention, all the modified grassland and all three trees will be lost to the development. The proposed dwellings are classified as ***u1b5 Buildings***, the proposed gravel driveway and parking are classified as ***u1c Artificial unvegetated, unsealed surface*** and the proposed gardens are classified as ***u1 Built-up areas and gardens*** with the secondary code ***828 Vegetated garden***.

An area of ***g4 Modified grassland*** is proposed in the north of the site (BNG in Figure 5). This is proposed in good condition, and will be seeded with a suitable wildflower mix containing species that respond well to regular mowing. Management will include relaxation of mowing during the spring and summer and removal of all arisings from any mowing undertaken, to allow for a variety of sward height. It would not be feasible to retain the grassland in-situ during construction as the construction traffic could not avoid driving over it. The grassland habitat is therefore treated as 'lost' then 'created' again in the metric.

Six small 'urban trees' are proposed to be planted within the grassland, classified as ***g4 Modified grassland*** with the secondary code ***200 Tree***. These are proposed in 'moderate' condition.

The existing hedgerow will be retained. A 28m stretch of ***h2a6 Other native hedgerow*** in 'moderate' condition is proposed (H2 in Figure 5).

Management prescriptions for all proposed habitats will be detailed in full in a HMMP.

Table 3. 'Habitat' enhancement and loss calculations

	Area retained (ha)	Area enhanced (ha)	Baseline units retained	Baseline units enhanced	Area habitat lost (ha)	Units lost
Modified grassland	0	0	0.00	0.00	0.03	0.05
Artificial unvegetated, unsealed surface	0.0127	0	0.00	0.00	0.06	0.00
Developed land; sealed surface	0.0022	0	0.00	0.00	0.01	0.03
Urban tree (poor)	0	0	0.00	0.00	0.01	0.03
Urban tree (moderate)	0	0	0.00	0.00	0.00	0.03
Totals	**0.01**	**0.00**	**0.00**	**0.00**	**0.12**	**0.12**

Table 4. 'Hedgerow' enhancement and loss calculations

	Length retained	Length enhanced	Units retained	Units enhanced	Length lost	Units lost
Non-native and ornamental hedgerow	0.027	0	0.03	0.00	0.00	0.00
Totals	**0.03**	**0.00**	**0.03**	**0.00**	**0.00**	**0.00**

Table 5. Post-intervention 'Habitat' (area) units created[11].

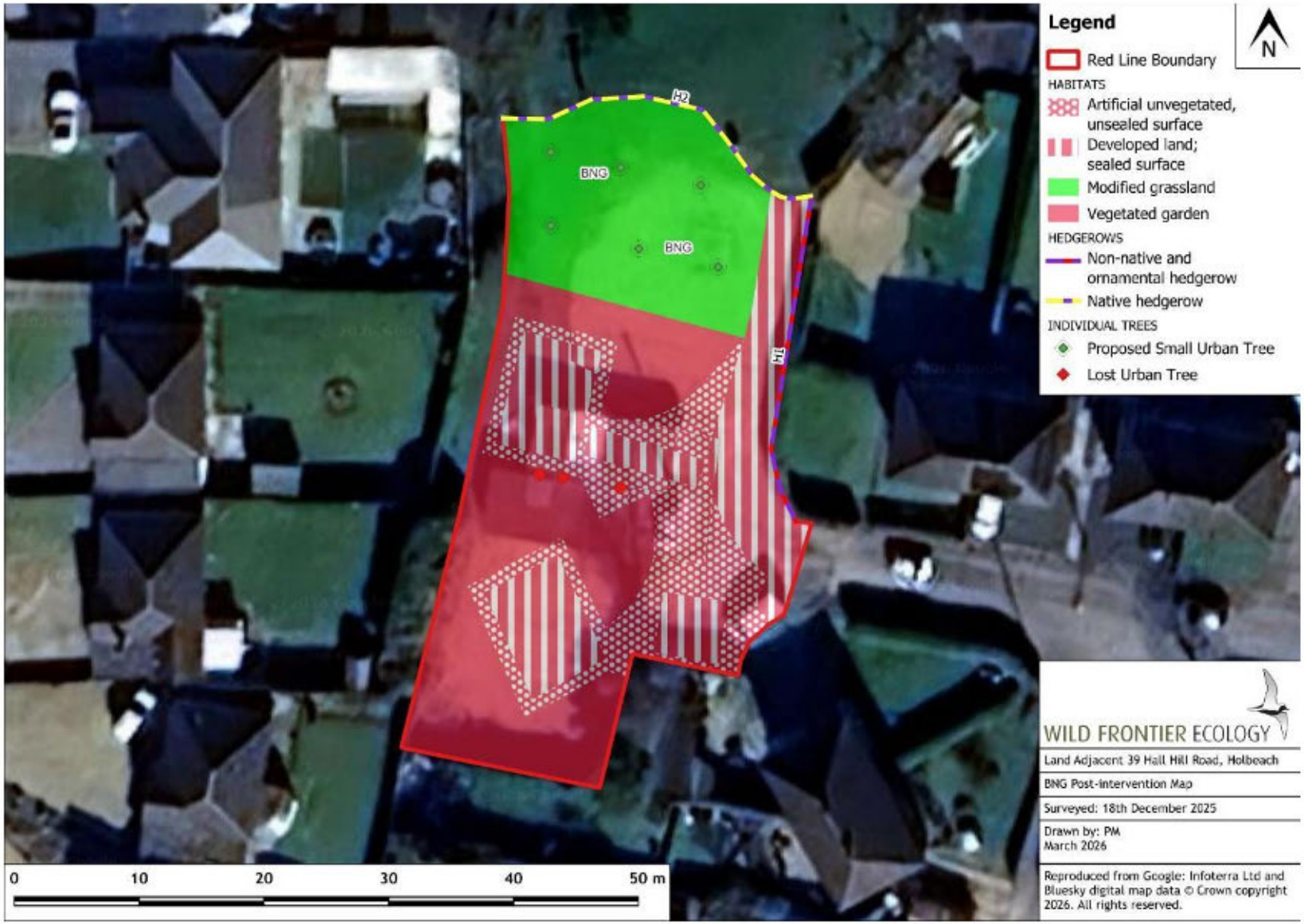
Habitat Type	Area (ha)	Distinctiveness	Condition	Delay in starting habitat creation (years)	Final time to target condition (years)	Strategic Significance	Units
Created							
Modified grassland	0.0312	Low	Good	1	8	Area/compensation not in local strategy/no local strategy	0.14
Artificial unvegetated, unsealed surface	0.0093	V. Low	N/A - Other	1	1	Area/compensation not in local strategy/no local strategy	0.00
Developed land; sealed surface	0.0285	V. Low	N/A - Other	1	1	Area/compensation not in local strategy/no local strategy	0.00
Vegetated garden	0.0372	Low	Condition Assessment N/A	1	2	Area/compensation not in local strategy/no local strategy	0.07
Urban tree	0.0244	Medium	Moderate	1	28	Area/compensation not in local strategy/no local strategy	0.07
						Total	**0.28**

[11] Any discrepancies in total values versus the values above are due to rounding. This value has been cross-checked.

Table 6. Post-intervention 'Hedgerow' (linear) units created.

Habitat Type	Length (m)	Distinctiveness	Condition	Delay in starting habitat creation (years)	Final time to target condition (years)	Strategic Significance	Units
Created							
Native hedgerow	0.028	Low	Moderate	1	6	Area/compensation not in local strategy/no local strategy	0.09
						Total	**0.09**

Figure 5. Post-intervention UK Habitat map



4.4 Summary of Results

Tables 7-8 summarise overall alterations in 'Habitat' (area) and 'Hedgerow' (linear) units based on broad habitat types.

Table 7. Summary of 'Habitat' units

Broad Habitat	Baseline		Post-development on-site		On-site change	
	Area (ha)	Units	Area (ha)	Units	Area (ha)	Units
Grassland	0.03	0.05	0.03	0.14	0.00	0.09
Urban	0.09	0.00	0.09	0.07	0.00	0.07
Individual trees	0.01	0.07	0.02	0.07	0.01	0.01
Total net change						**+0.16 (135.82%)**
Trading Rules satisfied: Yes						

Table 8. Summary of 'Hedgerow' units

Hedgerow Type	Baseline		Post-development on-site		On-site change	
	Length (km)	Units	Length (km)	Units	Length (km)	Units
Native hedgerow	0.00	0.00	0.03	0.09	0.03	0.09
Non-native and ornamental hedgerow	0.03	0.03	0.03	0.03	0.00	0.00
Total net change						**+0.09 (334.98%)**
Trading Rules satisfied: Yes						

5. Achieving Biodiversity Net Gain Targets

5.1 Achieving BNG On Site

The proposed development, as shown in Figure 3 and incorporating the ecological measures described in this report, achieves a net gain of 136% for 'Habitat' units and 335% for 'Hedgerow' units so it is considered feasible to meet the BNG targets for the proposed development.

5.2 Trading Rules

The Trading Rules have been met for this proposed development. The Trading Rules set minimum habitat creation and enhancement requirements to compensate for losses based on habitat distinctiveness. For example, compensation for the loss of a habitat with a 'medium' distinctiveness can only be achieved through the creation of the same broad habitat. More information on Trading Rules is provided in Appendix D.

5.3 Biodiversity Gain Plan

A Habitat Management and Monitoring Plan (HMMP) will need to be produced in due course, once planning consent has been achieved. For significant onsite enhancements, the developer will need to enter a legal agreement to secure a strategy on habitat establishment and management over the full 30-year legal requirement of BNG.

There is no requirement for a legal agreement to secure management of non-significant habitat enhancements. What constitutes a non-significant enhancement will be guided by the LPA, but it is generally understood to mean habitats of low distinctiveness or below. Private gardens for instance would not be considered a significant enhancement. However, a low distinctiveness habitat which significantly contributes to onsite biodiversity credits, would constitute as a significant.

Appendix A. Technical Information

Relevant Policy & Legislation

National Policy

The overarching policy guidance for biodiversity is included within the National Planning Policy Framework (NPPF). Section 15 of this document (Conserving and Enhancing the Natural Environment) outlines the approach that Local Authorities should adopt when considering ecological issues within the planning framework, including the principles of the Mitigation Hierarchy. This espouses that in addressing impacts on valued features, avoidance should be the first option considered, followed by mitigation (minimising negative impacts). Where avoidance and mitigation are not possible, compensation for loss of features can be used as a last resort. Paragraph 180(d) of the NPPF requires opportunities to incorporate biodiversity improvements in and around development as part of the design, especially where this can secure measurable **net gains** for biodiversity or enhance public access to nature where this is appropriate. Paragraph 179 specifies that plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including locally designated sites (such as CWS). It also promotes the conservation, restoration and enhancement of priority habitats and ecological networks and the protection and recovery of priority species.

The principle of net gain has been enshrined in law within the Environment Act 2021. The Act sets the minimum net gain at 10% and makes provision for offsetting both on and off site.

One aspect of England's approach to BNG is the use of a biodiversity metric to demonstrate that BNG has been delivered by following the mitigation hierarchy.

Sites where activity occurs, without planning permission, which lowers the biodiversity value of a site between 30th January 2020 and the implementation date will be expected to rely on the site's value prior to that activity. This is to avoid destruction of biodiverse sites in anticipation of the implementation of net gain. An ecologist will take a precautionary approach when assigning habitats and their distinctiveness and condition, according to good practice.

Calculations of net gain rely on a metric; there is a simplified metric for smaller sites.

Local Policy

The Norfolk Biodiversity Partnership (NBP) has published Habitat and Species Action Plans for selected species occurring within Norfolk. Each Action Plan lists current actions and defines objectives and targets.

The NBP has also published Biodiversity Supplementary Planning Guidance[12] for Norfolk. This document sets out the key considerations relating to wildlife and biodiversity that should be taken into account for all Norfolk development proposals.

UK Habitat Classification System

This section provides further detail on the UKHab classification system which is briefly described in the Methods section of the report.

[12] http://www.norfolkbiodiversity.org/assets/Uploads/Planning-guidlines2.pdf

For each distinct feature on or bordering the site (such as a woodland, grassland, hedgerow or stream, for example), a Primary habitat code is assigned, based on the UKHab technical definition which most accurately corresponds to that habitat or feature. Primary codes comprise a brief series of letters and numbers followed by a habitat description, such as ***w1f: Lowland mixed deciduous woodland*** or ***h2a5: Species-rich native hedgerow***. These definitions follow a five-level hierarchy of habitat definitions, with each successive stage of the hierarchy denoting a more refined habitat type. Definitions should progress as far into the hierarchy as it is possible for the ecologist to confidently do. At each successive stage an additional letter or number is added to the code. For example, ***w1f: Lowland mixed deciduous woodland*** is a fourth stage definition, with the preceding stages as follows:

- Level 1: all major UK ecosystems covering terrestrial, freshwater and coastal ecosystems; no codes apply at level 1.
- Level 2: the broad ecosystem type such as ***w: Woodland and forest*** (note only a single letter applies at this level)
- Level 3: the broad habitat type such as ***w1: Broadleaved and mixed woodland*** (note that a letter and a number apply at this level, indicating a more refined code than level 2)
- Level 4: the more precise habitat type such as ***w1f: Lowland mixed deciduous woodland***

Further refined habitat definitions are possible at level 5 that typically relate to specific, and sometimes unusual/rare habitat types. Examples that can be used in the above example include ***w1f5: Dry oak-dominated woodland, w1f6: Oak-hornbeam forests*** and ***w1f7 Other Lowland mixed deciduous woodland***. However, for some habitat classifications, UKHab extends to level 4 only.

The UKHab guidance advocates the use of multiple Secondary codes to add further detail or to refine the habitat description. Most Secondary codes can only be applied to certain Primary habitat types. Codes with two-digits are mandatory and must be used wherever the habitat or feature they describe is present, and three-digit codes are optional. Examples of mandatory Secondary codes that can be applied to the above Primary habitat category includes ***28: Ancient woodland site*** or ***29: Plantation***. Examples of optional Secondary codes would be ***206: Felled*** or ***210: Coppice***. The UKHab guidance advises the use of up to six secondary codes per feature. However, to avoid overcomplication of habitat descriptions, this report assigns Secondary codes only where they denote ecologically important detail.

The symbology used in UKHab maps is based on Primary habitat classification. Secondary codes are denoted on maps by listing the Secondary code number inside or alongside the relevant habitat block or feature.

Appendix B. UK Good Practice Principles[13]

Principle	Principle Detail
Apply the mitigation hierarchy	First avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve no net loss/net gain.
Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain. Achieve net gain in partnership with stakeholders where possible.
Address risk	Mitigate difficulty, uncertainty and other risks to achieving net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as compensate for the time between the losses occurring and gains being fully realised.
Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust credible evidence and local knowledge to make clearly justified choices when: • Delivering compensation that is ecologically equivalent in type, amount and condition and that accounts for the location and timing of biodiversity losses. • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation. • Achieving net gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels. • Enhancing existing or creating new habitat • Enhancing ecological connectivity by creating more, bigger better and joined areas for biodiversity.
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations, i.e. do not deliver something that would occur anyway.
Create a net gain legacy	Ensure net gain generates long-term benefits by: • Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity (the expectation is that compensation sites will be secured for at least the lifetime of the development often 25-30 years). • Planning for adaptive management and securing dedicated funding for long-term management. • Designing net gain for biodiversity to be resilient to external factors, especially climate change. • Mitigating risks from other land uses • Avoiding displacing harmful activities from one location to another • Supporting local-level management of net gain activities.
Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

[13] Baker, J, Hoskin, R, Butterworth, T Biodiversity Net Gain. Good practice principles for development. Part A: a practical guide. CIRA 2019 ISBN:987-0-86017-791-3.

Appendix C. Biodiversity Metric Principles from the BNG User Guide

Table 4 Biodiversity metric principles

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

Appendix D. Trading Rule Requirements

Table D.1. Trading rule requirements to compensate for habitat losses depending on distinctiveness[14]

Baseline Habitat Distinctiveness	Area Units	Hedgerow Units	Watercourse Units
Very high	Priority should be given to replacing losses with area habitat units of the same habitat type (see below notes on trading)	Losses must be replaced with hedgerow units of the same habitat type	Priority should be given to replacing losses with watercourse units of the same habitat type (see below notes on trading)
High	Losses must be replaced with area habitat units of the same habitat type	Losses must be replaced with hedgerow units of the same habitat type or of a higher band	Losses must be replaced with watercourse units of the same habitat type
Medium	Losses must be replaced by area habitat units of either medium band habitats within the same broad habitat type or, any habitat from a higher band from any broad habitat type	Losses must be replaced by area habitat units of either medium band habitats within the same broad habitat type or, any habitat from a higher band from any broad habitat type	Losses must be replaced by area habitat units of either medium band habitats within the same broad habitat type or, any habitat from a higher band from any broad habitat type
Low	Losses must be replaced with area habitat units of the same or higher band	Losses must be replaced with area habitat units of the same or higher band	Losses must be replaced with area habitat units of the same or higher band
Very low	Not applicable	Losses must be replaced with hedgerow units of the same or of a higher band	Not applicable

The Trading Rules only apply up to the point of no net loss. Once Trading Rules have been met, BNG requirements can be met by the creation and enhancement of any habitat, provided it is within the relevant module. For example, if a project loses 1 area biodiversity unit (ABU) generated by a high distinctiveness habitat then the Trading Rules mean that project must provide at least 1 ABU generated by creation or enhancement of the same habitat type which is lost.

[14] DEFRA (2024), 'The Statutory Biodiversity Metric User Guide', p. 26. Available at https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides