



**Somerset**  
Wildlife Trust

# **Somerset Wildlife Trust Position Statement**

**Biodiversity Net Gain (BNG)**

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## Somerset Wildlife Trust Position Statement: Biodiversity Net Gain (BNG)

### Introduction

For decades, building development has been a significant cause of nature loss. Biodiversity Net Gain (BNG) in England offers the potential for developers to take a different approach. **Somerset Wildlife Trust will always strongly oppose developments we feel are inappropriate and that will damage the environment.**

In January 2024 it became mandatory in the UK to achieve at least 10% Biodiversity Net Gain on all new developments in addition to the required compensation. **These new obligations do not replace existing requirements to avoid impacts to wildlife.** There is a clear mitigation hierarchy within BNG, which does not give developers free rein to damage habitats on a promise that harm can be rectified elsewhere. But where, as a last resort, damage to habitats cannot be avoided, there is an obligation to deliver biodiversity gains through the enhancement, restoration or creation of new habitats that will deliver a net positive for the local environment - and these gains must be managed and maintained for at least 30 years. Whilst some developers will find this on-site, others will need to find external sites to deliver these requirements.

Our view on Biodiversity Net Gain is that when planning is already granted, and if delivered properly and effectively, **BNG is a funding mechanism that will enable landowners and others to access funding that can potentially improve habitats and enable Nature's Recovery.** Our concerns are around the difficulties of monitoring and verification so we must therefore ensure that we work proactively with the development sector to ensure that through BNG they contribute to meeting national targets for nature recovery and that those developments genuinely leave a positive legacy. We believe that BNG should go above the mandatory 10%, and we aim for a higher figure wherever possible.



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## **Our overarching principles which we advocate for BNG include:**

- We must ensure no overall loss to biodiversity and secure genuine additional and permanent gains to support nature recovery across Somerset.
- BNG must follow through and not replace or undermine the mitigation hierarchy.
- There are four main steps that must be applied in assessments. The four steps being: Avoidance, Minimisation, Restoration and finally Offsetting.
- BNG must not be applied to irreplaceable habitats (England's most valuable habitats). Within Somerset we understand these would include Veteran Trees, Lowland Fens, Ancient Woodland, and Sand Dunes. We understand that Defra will be conducting a further public consultation on 'irreplaceable' habitats in 2024.
- BNG once delivered must be protected in perpetuity on Trust-owned land and we'd support and actively encourage this on Third-Party Land.
- Where its practicable BNG must ensure like for like habitat enhancement or creation.
- BNG must be objectively assessed using the most up to date Defra metrics (currently Defra metric 4.0) with use of associated guidance, to determine the pre-development and post-development biodiversity losses and gains.
- Importantly BNG must be properly monitored verified and informed. This doesn't happen in current planning schemes as it should. BNG payment would cover the long-term costs for monitoring and management. This is critical to ensure it delivers.
- BNG must be underpinned by strong legislation and regulations with the necessary resources allocated to enforce this and with clear penalties to ensure the requirements are met.

## **Somerset Wildlife Trust's BNG offer**

Somerset Wildlife Trust's own BNG offer is two-fold; it has a number of sites across the county through which BNG units are readily available for purchase by developers. In addition, its ecological and land management consultancy, SWTC, provides a range of consultancy services to support both developers and landowners who are looking to deliver BNG as part of their projects. Calculating biodiversity uplift on landholdings which include different habitats, and working with complex BNG metrics is challenging. SWTC can offer a whole service from initial survey, calculation and habitat delivery, optimising wins for nature and delivering income for landowners.

You can find out more about BNG services [here](#).

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