



**Biodiversity
and Environmental
Net Gain Group**



Letter on concerns regarding the removal of BNG requirements for small sites

Rt Hon Emma Reynolds MP & Rt Hon Steve Reed MP,
Secretary of State for Department of Environment, Food and Rural Affairs &
Secretary of State for Department of Housing, Communities and Local Government,
Seacole Building, 2 Marsham Street,
London, SW1P 4DF

15th December 2025

Re. Why we are in support of the BNG requirements for small sites

Dear Secretaries of State,

We write as a coalition of businesses and experts from across the construction and built environment value chain, alongside conservation experts, led by the Green Construction Board and the UK Green Building Council (UKGBC). Together, we represent a broad cross-section of developers, contractors, consultants, researchers, product manufacturers, financiers, planners, and place-makers who are committed to delivering high-quality, nature-positive and regenerative built environments.

We have heard that the Government is considering removing Biodiversity Net Gain (BNG) requirements for small sites and introducing wider exemptions, that is, all sites under 1 ha or 0.5 ha will be exempt. Such changes risk severe negative implications for private investment in nature, the burgeoning nature markets, businesses striving and succeeding in the creation of sustainable, healthy and resilient places and most of all the people that live in these places.

Strong nature policy is compatible with growth, as evidenced by the [Environmental Audit Committee](#). There is strong and rapidly growing industry support for investing in nature, our Local Planning Authorities have invested heavily in recruitment and staff training to assess and deliver BNG, including as a pillar of Local Nature Recovery Strategies (LNRSs) with an increasing pipeline of LPA and community delivered urban Biodiversity Units becoming available. These local green spaces are essential to prevent flooding, overheating, improving air quality, and to provide outdoor space for people as well as nature. Nature also increases asset value. Research from the [Urban Land Institute](#) shows that properties with biodiversity features can command price premiums of between 5% and 15%, reflective of the growing market value of nature-connected spaces. Data from the RSPB shows [two-thirds of the public think developers should look after the natural environment](#) in new developments, and want important habitats given even stronger protection. Furthermore, 43% of British people are more likely to vote for a party that prioritises nature conservation, compared with only 10% who say they are more likely to vote for one prioritising housebuilding. Small amounts of greenspace deliver a huge number of services, with pocket parks ranging from 0.02 to 0.4ha, 1ha-0.5ha is not an amount of greenspace we can afford to remove with no market drivers to retain or replace.

Small sites form the backbone of our housing construction pipeline, BNG legislation ensures that these developments do not leave nature, or existing and new residents, in a worse



position than prior to development. Removing BNG requirements threatens to undermine nature recovery at scale, including progress towards our legal Environment Act targets, and commitments in the Environmental Improvement Plan. It risks weakening confidence in the emerging nature investment market at precisely the moment when it is beginning to accelerate and businesses are on board. This will also have profound consequences for placemaking, public health, social value, and long-term community wellbeing, potentially embedding a negative legacy in the built environment for decades to come.

Fully functioning BNG is a central pillar of the GCB's [Biodiversity Roadmap](#), published by the CLC in 2024, and underpins our collective nature-positive ambitions. Without a reliable and comprehensive BNG policy, one that includes sites above 0.1 ha, these shared sector ambitions, and the Roadmap itself, will be significantly undermined.

Across the sector, we are witnessing rapid uptake of nature-related standards and disclosure frameworks. The Taskforce on Nature-related Financial Disclosures (TNFD) has seen a 57% increase in adoption since its formal launch in January 2024, mirrored by rising client and investor expectations. Investors seeking nature-positive portfolios are committing to demonstrable enhancements, and globally there is strong demand, often outstripping supply, for high-quality nature restoration and nature-based carbon reduction projects. A well-functioning BNG market could generate [£250m in economic activity a year and support over 2450 full time jobs](#) - exempting small sites would destroy this by reducing demand for nature credits and sharply [cutting private investment](#).

To unlock these opportunities and maximise benefits for the UK economy, climate resilience and environmental goals, industry urgently needs policy certainty that rewards firms prepared to invest and supports those already doing the right thing. With such a short implementation time there are certainly elements for improvement that we support, for example around clarity on BNG and around brownfield development priorities and the development of local and community led projects for generating Biodiversity Units to deliver BNG. But improvements are possible and indeed are already under development with broad sector input, and there are developing tools and solutions to expedite and simplify the process. As [modelled by eftec](#), a 0.1 ha threshold offers a reasonable and proportionate way forwards, exempting only the 50,000+ of the smallest developments each year, while also continuing to support the integrity and function of the policy. Blanket exemptions risk disproportionate harm, lost investment, and a weakening of the UK's international leadership in nature markets.

We therefore urge the Government to maintain a robust BNG framework, including for small sites, to protect confidence, sustain investment, and ensure a positive legacy for communities, nature, and the built environment. We would be keen to meet to discuss proposals and facilitate engagement with our industry networks on the issue. We know that biodiversity is good for business and would like the opportunity to convey this to you.

Yours sincerely,

Dr Martina Girvan Chair of the Green Construction Board's Biodiversity and Environmental Net Gain (BENG) Group



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Jo Wheeler, Co-Head of Policy and Places, UK Green Building Council

Sir Partha Dasgupta, Emeritus Professor at Cambridge University, author of *The Economics of Biodiversity: The Dasgupta Review*

Rachel Solomon Williams, Executive Director, Aldersgate Group

Eoghan O'Lionaird, Chief Executive Officer, Wates Group

Laura Broderick, Programme Director, Good Homes Alliance

Amanda Keetley, Executive Director, Devon Environment Foundation

Robert Oates, CEO, Arbtech

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Rich Speak, Co-Founder and Managing Director, Finance Earth

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¹ The Leverhulme Centre for Nature Recovery is interested in promoting a wide variety of views and opinions on nature recovery from researchers and practitioners. The views, opinions and positions expressed within, do not purport to reflect the opinions or views of the Leverhulme Centre for Nature Recovery, or its researchers.



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