



## Making biodiversity gain deliver for nature recovery in Suffolk

### An advocacy paper for Suffolk local planning authorities

Biodiversity [net] gain (BNG) could help reverse biodiversity declines and increase nature in Suffolk while providing a host of social, environmental, and economic benefits.

Suffolk's Local Nature Recovery Strategy will help to target efforts to create and restore priority habitats where they will contribute most to nature recovery by creating more, bigger, better connected ecological networks.<sup>1</sup>

But margins for error and uncertain ecological outcomes mean that BNG of 10% (the minimum that will be required by national legislation) is not enough to deliver meaningful uplift for nature recovery.

In addition, a loophole that would allow the sale of 'excess' biodiversity could set the ceiling for BNG at this inadequate level and undermine the ecological benefits already provided by some types of development, meaning BNG could in practice result in worse net outcomes for nature.

Local authorities have a chance to develop and adopt local policies and frameworks to ensure BNG delivers what it is designed to: development that increases nature and contributes to its recovery.

**Suffolk Wildlife Trust has five recommendations for actions local planning authorities (LPA) can start to take now to ensure BNG achieves its potential to support nature recovery in Suffolk.**

We will work with and support Suffolk planning authorities to take these actions, which are essential for ensuring growth and development contribute positively to our vision for a wilder Suffolk.

### Recommendations

**1. Adopt a policy requirement for development to deliver a minimum of at least 20% BNG.**

In the meantime, LPAs can develop Guidance Notes and/or Supplementary Planning Documents to encourage development to deliver above the national minimum of 10% BNG.<sup>2</sup>

**2. Start work now to gather evidence to support such a policy, including:**

- 2.1. the ecological needs case,
- 2.2. the business case: justification, proportionality, costs, benefits, and potential savings of 20% vs 10% BNG

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<sup>1</sup> Note: It is unlikely that this will be completed and published before the end of 2024. [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/local-nature-recovery-strategies)

<sup>2</sup> Lichfield District Council became one of the first LPAs in England to require development to deliver BNG at a level of 20%, specified in a Supplementary Planning Document. See [Walsall and Lichfield Council's collaboration on a Natural England Nature Recovery Project | Local Government Association](https://www.local.gov.uk/news/walsall-and-lichfield-councils-collaboration-on-a-natural-england-nature-recovery-project)

- 2.3. viability assessment to demonstrate the deliverability of the policy while meeting LPAs' housing and economic growth and development targets,
- 2.4. assessing supply and demand for off-site Biodiversity Units.

3. **Deliver a proportion of all BNG off site and target delivery in the strategic Nature Recovery Network** to ensure BNG contributes to nature recovery in Suffolk.<sup>3</sup>
4. **Seek to prevent the sale of 'excess' on-site Biodiversity Units (BU) as off-site gains for other development.**
5. **Develop Local Authority 'habitat banks'** to create and restore priority habitat ahead of loss in locations where it will contribute to nature recovery.

### **Summary: why 20% BNG**

Adopting a Local Plan policy requiring development to achieve at least 20% BNG would:

1. Increase confidence in development delivering genuine and meaningful biodiversity gain (not just no net loss).
2. Help to address long-term biodiversity loss and ecological degradation in Suffolk.
3. Enable BNG to achieve Government's stated aim to contribute to nature recovery.
4. Contribute to achieving national targets, including 30% of land and seas protected and enhanced for nature by 2030 and half a million hectares of new wildlife habitat.
5. Help local authorities meet their duty to conserve and enhance biodiversity.<sup>4</sup>
6. Deliver a wide range of associated ecosystem services benefits, from air and water quality to climate mitigation and adaptation, and health and wellbeing.
7. Provide efficiency and cost saving on monitoring and enforcement of BNG.
8. Be unlikely to materially affect the viability of building new homes.
9. Be defensible at Local Plan examination and defensible in the face of appeals by developers.
10. Be a reasonable and proportionate minimum to expect development to achieve.

These recommendations can be taken forward by all local authorities individually, but the greatest benefit for nature and people will be from collaboration and coordination across LPA boundaries.

Suffolk Wildlife Trust is committed to working with and supporting Suffolk's local authorities act on these recommendations to help create a wilder Suffolk for people and nature.

### **Supporting evidence**

We have begun to gather the evidence to support more ambitious local BNG policies in Suffolk.

For a more detailed understanding this paper should be read in conjunction with the supporting evidence, which is provided as an annex available on request.

### **For more information, please contact:**

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<sup>3</sup> The Local Nature Recovery Strategy for Suffolk will identify the strategic NRN for targeting BNG and other habitat creation and restoration measures.

<sup>4</sup> [Section 40 of the Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk)