



Lone Wolf Planning Ltd.

Biodiversity Net Gain Statement for
Development Below the incoming BNG
Very Small Sites Threshold

Proposal: Erection of a Dwelling

Site address: Land at Birdbush Park,
Birdbush, Wiltshire



1. Introduction

- 1.1 Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG ensures that development has a measurably positive impact on biodiversity, compared to the pre-development baseline.
- 1.2 In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by the Environment Act 2021). Subject to exemptions and modifications set out in legislation, development is required to deliver a minimum 10% biodiversity net gain, secured through a Biodiversity Gain Plan.
- 1.3 On 16th December 2025 Matthew Pennycook MP included the following in a Ministerial Statement¹:
- "having considered carefully the responses to the consultation undertaken by the Department for Environment, Food and Rural Affairs (Defra) earlier this year, I can confirm that the government will exempt smaller developments up to 0.2 hectares from biodiversity net gain"*
- 1.4 The applicant acknowledges that BNG remains mandatory for sites under 0.2ha until legislation is changed to bring this new exemption into effect.
- 1.5 However, acknowledging Government's direction of travel with regard to BNG, the applicant submits this simplified BNG metric for this very small site. We trust that local planning authorities and consultees will take a proportionate approach to BNG on small sites until the they are exempt.
- 1.6 This statement has been prepared to accompany the submitted BNG Spreadsheet, which applies the statutory biodiversity metric proportionately to very small sites.

2. Site Context and Scale of Development Justification

- 2.1 The application site:
- has a total site area of less than 0.2 hectares;
 - contains no priority habitats and no designated ecological sites;
- 2.2 The development does not constitute major development for the purposes of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

¹ <https://questions-statements.parliament.uk/written-statements/detail/2025-12-16/HCWS1187>



3. Statutory Position on Biodiversity Net Gain

- 3.1 While BNG applies in principle to planning permissions granted in England, the statutory framework recognises that **very small-scale development on low-value sites should be addressed proportionately**.

At the time of submission:

- there is **no statutory blanket exemption** based solely on site area below 0.2 hectares;
- exemptions remain limited to those prescribed in legislation, including the **de minimis exemption** and other defined categories.

- 3.2 Accordingly, this submission does **not** assert that the development is exempt from BNG by virtue of site area alone.

4. Proportionate Application of the Statutory Metric

- 4.1 In line with national guidance and recent ministerial statements indicating that BNG should not act as a barrier to very small sites, a **proportionate assessment** has been undertaken using the statutory biodiversity metric.

- 4.2 The submitted BNG Spreadsheet:

- applies conservative assumptions consistent with the Statutory Metric;
- identifies a **very low baseline biodiversity value**;
- quantifies post-development off-site requirements.

- 4.3 This approach ensures that:

- the statutory framework is fully respected;
- the Local Planning Authority is not asked to disregard legislative requirements;
- BNG outcomes are secured in a manner commensurate with the scale and impacts of the development.

5. Relationship with De Minimis Provisions

- 5.1 The assessment confirms that impacts are limited to habitats of very low distinctiveness.

- 5.2 While the development is of a scale that aligns with the intent of the de minimis provisions,



this submission instead demonstrates compliance through measured net gain, rather than reliance on a claimed exemption.

5.3 This ensures clarity, transparency, and robustness in decision-making.

6. Conclusion

6.1 This statement, read alongside the submitted BNG Spreadsheet, demonstrates that:

- biodiversity net gain has been properly considered;
- the statutory metric has been applied proportionately;
- a minimum 10% biodiversity net gain can be achieved and should be controlled.

6.2 The Local Planning Authority can therefore be satisfied that the proposal complies with the statutory requirements for biodiversity net gain in a lawful and pragmatic manner.

6.3 Any required Biodiversity Gain Plan will be secured through an appropriate planning condition or legal agreement, ensuring full compliance with the Environment Act 2021

