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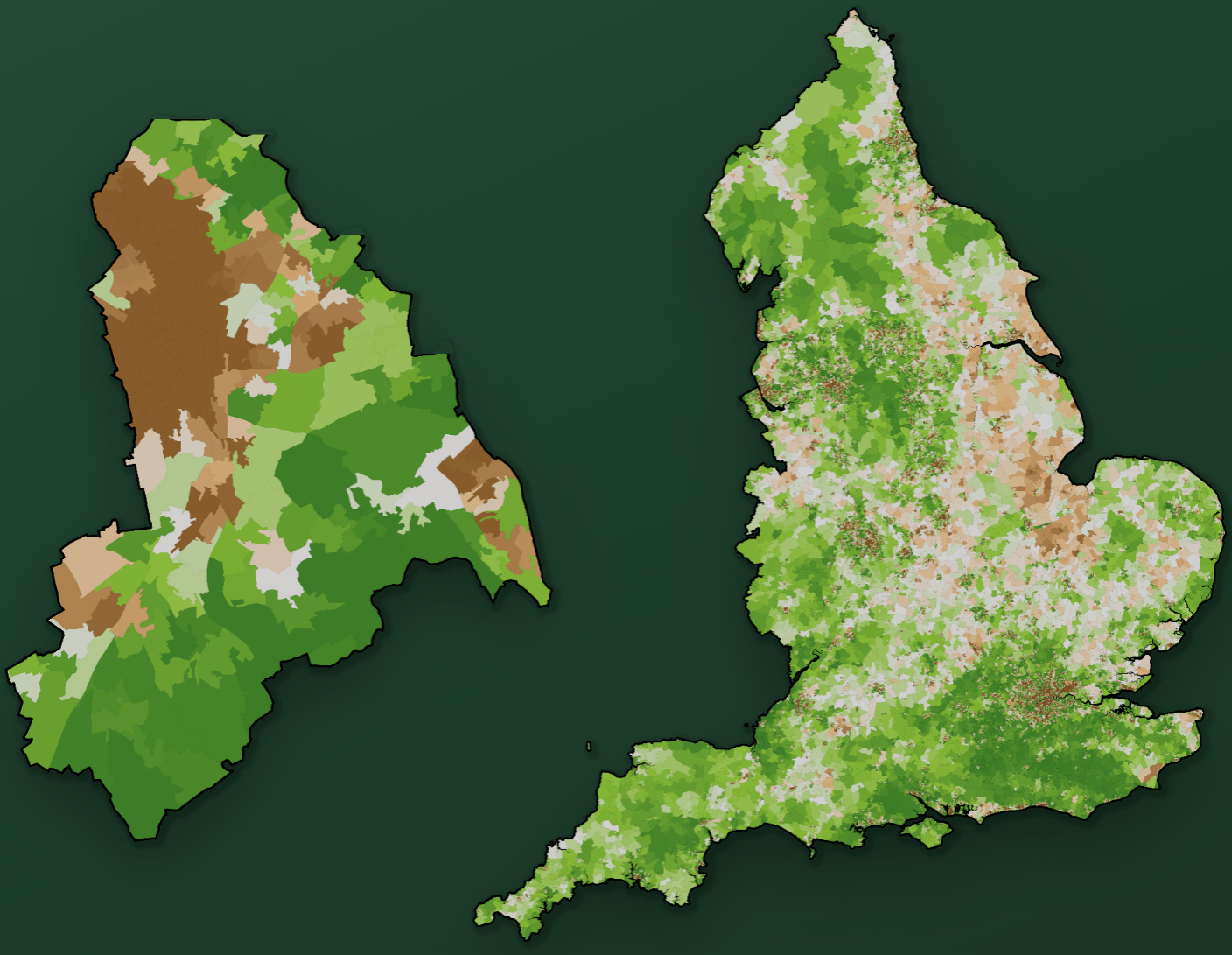
POLICY REPORT

Green Gap

How BNG exemptions deepen nature poverty across England's most deprived communities



BIODIVERSITY, DEPRIVATION & ACCESS TO NATURE IN ENGLAND

Executive Summary

Our report reveals a stark reality: England's most socio-economically deprived communities face profound nature poverty. This environmental inequality is set to worsen significantly due to the expansion of Biodiversity Net Gain (BNG) policy exemptions under the Labour Government.

While BNG was designed to ensure development leaves the natural environment in a better state than before, current frameworks and proposed loopholes are disproportionately stripping environmental protections from the very communities that need them most. In this report, we highlight how existing inequalities are being entrenched by planning policy, and outline urgent recommendations to the Government to safeguard biodiversity and access to nature.

Key findings

The broadening biodiversity access gap

Over 7.4 million people in England live in areas completely devoid of immediate biodiversity. This severe nature poverty gradient is driven not by the rural-urban divide, but by extreme environmental disparities within towns and cities. In the most deprived 20% of neighbourhoods, almost a third of residents face highly restricted biodiversity access. This is nearly three times the rate of the most affluent communities.

Backtracking on BNG promises

Existing and proposed BNG exemptions and loopholes — including the recent small sites exemption, the abuse of the de minimis threshold, and the currently proposed brownfield residential site exemption — all worsen outcomes for people already living in nature poverty. Backtracking on the promise of BNG affects the most underprivileged, asset-poor and urban communities, where the majority of potential housing capacity is most heavily concentrated.

The need to protect against further erosion of BNG and access to nature

In order to avoid the creation of widespread urban ecological deserts and protect access to nature for the most deprived communities, the Government must immediately drop its proposed brownfield exemption, tighten the de minimis threshold, and enact a legally binding 5-year policy lock-in to protect BNG from further detrimental changes. Above all, we urge the Government to mandate a statutory Equality Impact Assessment for BNG Frameworks to embed access to nature in planning policy.

Background

The UK is one of the most nature-depleted countries in the world.[1] To address this, in 2019, the Department for Environment, Food and Rural Affairs committed to introducing statutory BNG within two years of the Environment Act coming into force. The statutory regime took effect slightly later than planned in 2024, and since then, most developments have been required to offset their environmental impact by 10%.

Introduced under the previous Government, BNG has gained cross-party support and is widely regarded as a successful framework for tackling biodiversity decline and mitigating the effects of climate change. It has been held up internationally as a model: the policy was referenced at the United Nations Biodiversity Conference (COP16) in Cali, Colombia, and variants of the BNG metric are now in use in countries as diverse as Saudi Arabia, the United States, the Netherlands, and India.[2] To date, more than 6,220 hectares (HA) have been registered on the Government's national BNG register — roughly 87,500 football pitches of land set aside for nature recovery that might otherwise never have been.[3]

Despite the early success of the policy, the current Government has introduced new exemptions and a series of consultations to accelerate its ambition to build 1.5 million homes before the end of this Parliament.[4] This includes an exemption of all sites below 0.2HA, the potential extension of the de minimis exemption, and a new proposed exemption to brownfield sites below 2.5HA. This erosion of BNG has created significant uncertainty in the statutory BNG market, limiting its ability to grow at the rate initially projected. The cumulative cost is a series of missed opportunities to reverse biodiversity loss and unlock economic growth at the same time.

But it is not only a question of biodiversity or economic growth. Access to nature carries substantial physical and mental health benefits, and those benefits translate into savings for the NHS.[5] The people with the least access to green space are also those in the poorest health. Recent analysis from the Health Foundation found that healthy life expectancy in the UK has fallen by two years over the last decade.[6] Office for National Statistics data covering 2022–2024 compared with 2012–2014 shows that those in the wealthiest 10% of areas can expect around 20 more years of good health than those in the poorest.[7] The knock-on impacts of this are profound. Research by Vitality found that between 2014 and 2023, the cost of lost productivity due to ill health to the UK economy is £860bn.[8] Furthermore, as CEO of Natural England, Marian Spain, specifically mentioned in her speech at UK REiiF, nature is also critical to mitigate issues from flood risk to climate resilience — something which impacts deprived communities just as much as the wealthy.[9]

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[1] State of Nature, State of Nature report 2023, September 2023 (lin,k)
[2] Natural England, International use of England's biodiversity metric having global impact, November 2024 (link)
[3] GOV.UK. Search the Biodiversity Net Gain sites register, March 2024 (link)
[4] Environmental Audit Committee (2025). Environmental sustainability and housingknock-onknock-on impacts growth, November 2025 (link)
[5] The Wildlife Trusts (2023), A Natural Health Service Improving lives and saving money, July 2023 (link)
[6] The Health Foundation, Healthy life expectancy trends in the UK: a watershed moment, April 2026 (link)
[7] Office for National Statistics. (2026). Healthy life expectancy, UK, February 2026 (link)
[8] Vitality, 10 Years of Britain's Healthiest workplace, 2023 (link)
[9] GOV.UK, Nature and Growth, May 2026, (link)

This report examines how changes to BNG will fall hardest on people in the most deprived areas — and, in doing so, cause further damage to the physical and mental health of communities around England.

Deprivation and Biodiversity Access

Evidence from Natural England already shows that people in the most socially deprived areas are less likely to have easy access to nature and the benefits it brings. Its report, *Local Greenspace in Everyday Life*, found that only around a quarter (26%) of adults in the most deprived areas have access to nature, compared with well over a third (38%) in the least deprived.[10]

Our new analysis examines deprivation and biodiversity access at a more granular level. We find that 7.4 million people in England (13%) live in neighbourhoods with no immediate access to biodiversity, including 1.42 million children under the age of 15.

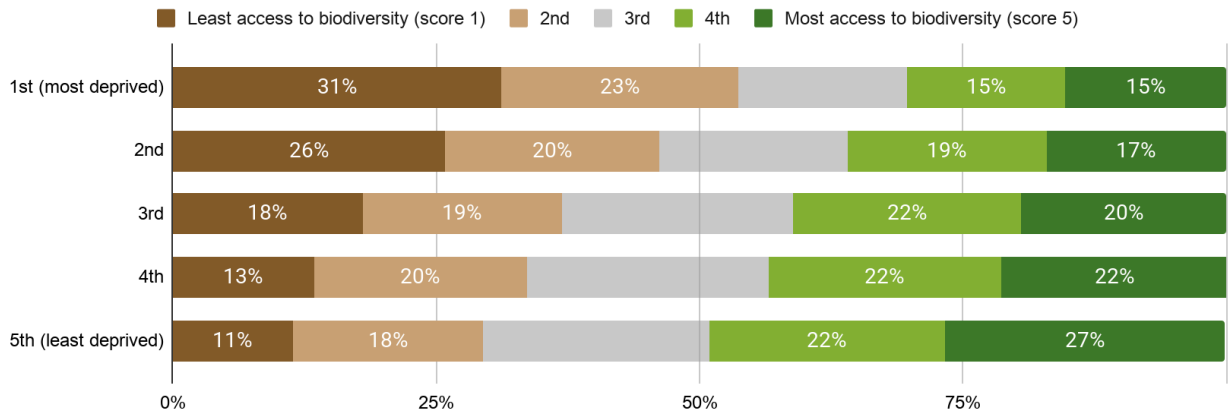

Figure 1: *A stacked horizontal bar plot illustrating the biodiversity access gap between deprived and affluent areas in England.*

As deprivation increases, access to biodiversity decreases. In the most deprived 20% of neighbourhoods, 31% have very limited access to biodiversity, almost three times the figure for the most affluent 20%, where only 11.4% face the same limitation.

The same pattern holds at the other end of the scale. Among the least deprived neighbourhoods, 26.6% enjoy the highest band of biodiversity access, compared with just 15.3% of the most deprived.

These findings cannot be explained by the urban-rural divide, or by the tendency of affluent households to live in rural areas. Restricting the analysis to urban areas alone (covering 47.1 million people, or 83%

[10] Natural England, Local greenspaces in everyday life: Visits, quality, and barriers across different groups, December 2025 (link)

of England's population) leaves the deprivation gradient almost identical. Biodiversity inequality is driven primarily by disparities within towns and cities, rather than between urban and rural England.

In London, at a borough level, Croydon shows the most extreme inequality in access to nature. Its most affluent neighbourhoods enjoy 73% biodiversity access, against just 24% in the most deprived. That is a 48 percentage point gap within a single local authority.

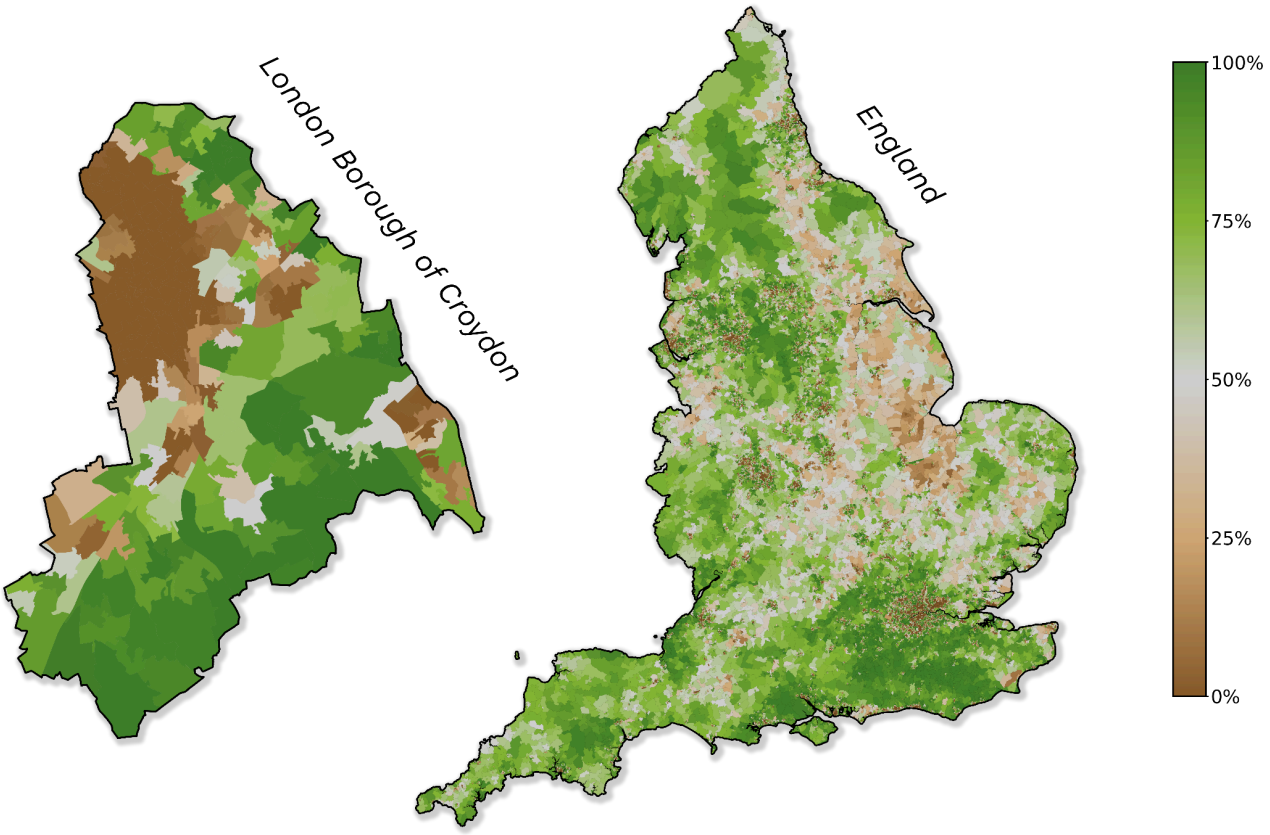

Figure 2: *Neighbourhood level map (LSOA) of England and the London Borough of Croydon showing the spatial inequality in access to local biodiversity.*

The pattern extends well beyond the capital. Three northern post-industrial authorities — Middlesbrough, Sandwell, and Blackburn with Darwen — sit alongside London boroughs in the top inequality bracket, with gaps of 35, 33, and 32 percentage points respectively.

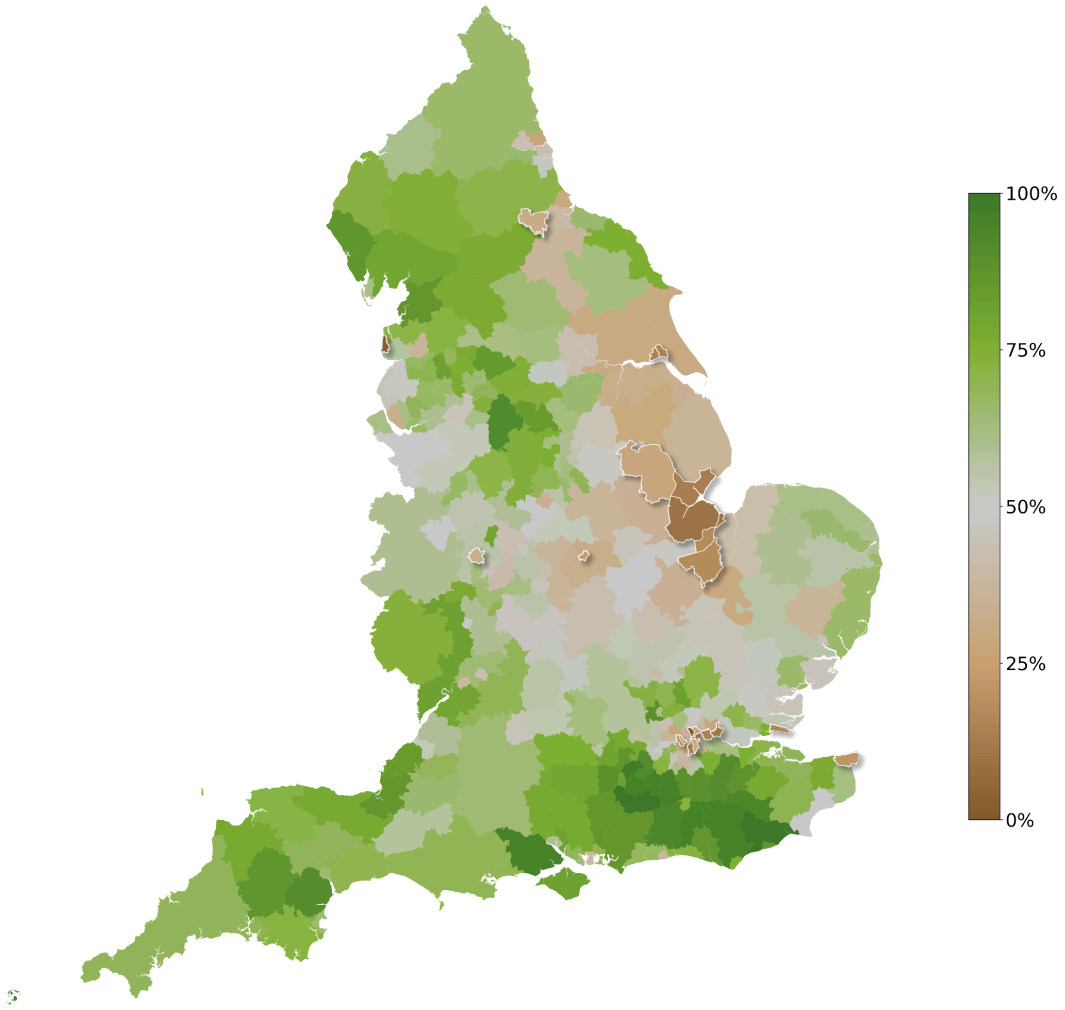

Figure 3: *A map indicating the worst Local Planning Authorities in England for biodiversity coverage.*

How the 0.2HA Threshold exacerbates inequalities

In the final months of 2025, the Government committed to a blanket exemption from BNG requirements for all development sites below 0.2HA. Our findings show this exemption will fall hardest on the most deprived and biodiversity-sparse areas of the country, widening existing inequalities and further limiting access to nature for the groups already worst served.

Figure 4: *Scatter plot showing a clear statistically significant correlation between the Index of Multiple Deprivation and proportion of applications under 0.2ha for each Local Authority.*

The most deprived areas already have a much higher share of development applications below the proposed exemption threshold. In the most deprived local authorities, roughly 82% of applications are already under 0.2HA.

Of the 15 local authorities in England with the highest share of small-site applications, 12 sit within the 40% most deprived nationally; only one falls among the least deprived.

In practice, this means more than four in five applications in the most deprived areas could fall outside BNG requirements altogether, compared with around seven in ten in the least deprived. Applied across all qualifying applications in a single year, the exemption would equate to the loss of nearly 11,000 mature trees or 400 football pitches of wildflower meadows.

Put simply, the exemption does not apply fairly. It removes biodiversity from the places that need it most, and worsens access to nature for the most underprivileged communities.

How the existing de minimis exemption exacerbates inequalities

The de minimis exemption to BNG is intended to apply only to developments that do not impact a priority habitat, and which impact less than 25 square metres of non-priority on-site habitat. Its intended use was to ensure that very minor developments, such as a building changing its signage, would not be

subject to BNG. But analysis indicates it has been subject to widespread exploitation. Despite this, it remains in place, and the Government has ignored extensive calls to remove it.

The de minimis exemption is now the single most used route out of delivering BNG. It accounted for 62% of all BNG exemptions and 57% of all planning applications submitted in England between March 2024 and February 2025. The volume of de minimis exemption claims also rose nationally by 178% in the first year of its implementation between March 2024 and February 2025.

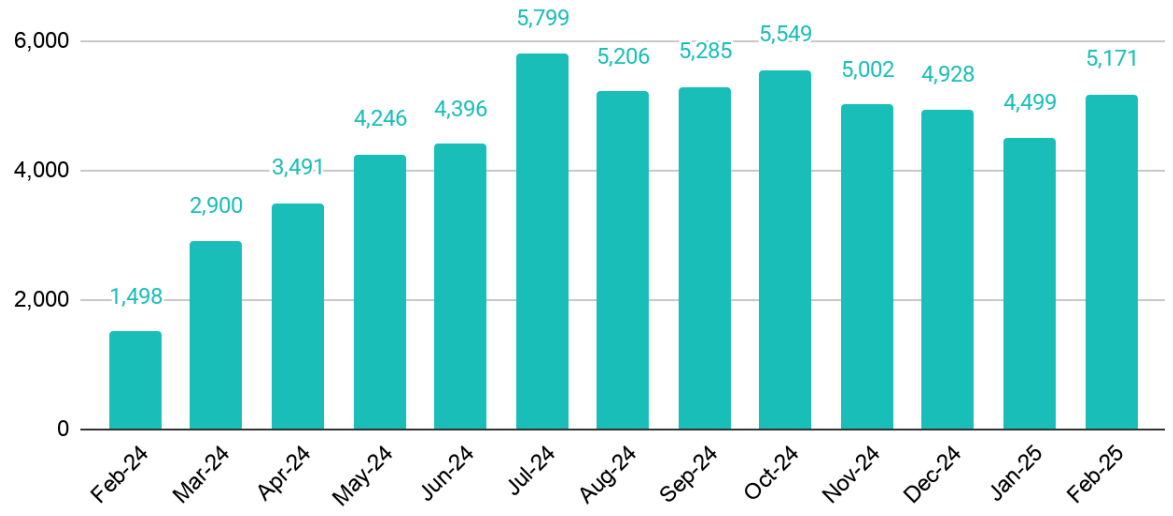

Figure 5: *Bar chart indicating the number of de minimis claims made across England*

The increase in de minimis exploitation is evidenced across the entire country. Out of 345 jurisdictions with sufficient data to be tested, 321 (93%) show de minimis use trending upwards.

Councils in London have seen the largest absolute increase in monthly de minimis claims. The biggest significant increases are recorded in Brent (+181%), Lambeth (+202%), Enfield (+189%), Bristol (+167%) and Barnet (+176%), with further significant increases in Kensington and Chelsea, Croydon, Camden, Islington and Wandsworth.

As with the 0.2HA exemption, our analysis reveals a clear and statistically robust link between how heavily a Local Authority relies on the de minimis exemption and how deprived it is. The most deprived parts of England are 17% more likely to make de minimis exemption claims than other, less deprived parts of the country.

Of the 15 Local Authorities in England that lean most heavily on de minimis as a share of their exemptions, 8 sit among the most deprived areas nationally, against only 3 in the least deprived. Authorities with very high de minimis shares include Coventry (81%), Bristol (79%), Islington (78%), Camden (77%) and Hackney (76%).

Twenty-two of England's most deprived authorities also rank among the places making the heaviest use of de minimis exemptions. Together, they are home to around 6.5 million people, including 1.25 million children and 1.31 million older residents. These are communities where access to nature is already among the weakest in the country, yet exemptions that allow developments to avoid biodiversity requirements are being used at especially high rates, raising the risk that the limited biodiversity in these areas is further eroded.

The risks of the proposed Brownfield exemption deepening inequalities

This Government has committed to a brownfield-first approach to development as part of its manifesto pledge to deliver 1.5 million homes by the end of the current parliament. This prioritises building on previously developed, disused and neglected urban land over greenfield sites, and several actions have already been taken to enact this approach, including updating the National Planning Policy Framework (NPFF) guidelines and launching the Brownfield Land Release Fund.[11,12]

The Government's latest proposal, however, seeks to exempt huge swathes of brownfield land from BNG requirements. The consultation on considering a targeted exemption for residential brownfield development positions BNG as a blocker to development by stating that a brownfield land exemption could help 'accelerate housing delivery on well-connected urban sites'.[13] The solution they've proposed is a substantial exemption for brownfield sites up to 2.5ha — representing a serious threat to biodiversity, the overall market stability of BNG, and crucially, to deprived communities across the country.

Nearly 44.3 million people in England (78% or 3 in 4) live with some form of designated brownfield land in their immediate neighbourhood, including 8.3 million children under 15. There is also a clear and statistically robust relationship between deprivation and brownfield exposure across England, but in the opposite direction to biodiversity access: more deprived neighbourhoods sit next to substantially more brownfield land (ρ = +0.28, at LSOA level; ρ = +0.36 at Local Authority level). A residential brownfield exemption from BNG would therefore concentrate avoided biodiversity obligations in precisely the communities already most affected by a lack of nature.

[11] GOV.UK, National Planning Policy Framework, February 2025 (link)
[12] GOV.UK, Thousands of new homes to be built as government unlocks brownfield sites, October 2024 (link)
[13] GOV.UK, Biodiversity net gain: considering a targeted exemption for brownfield residential development, April 2026 (link)

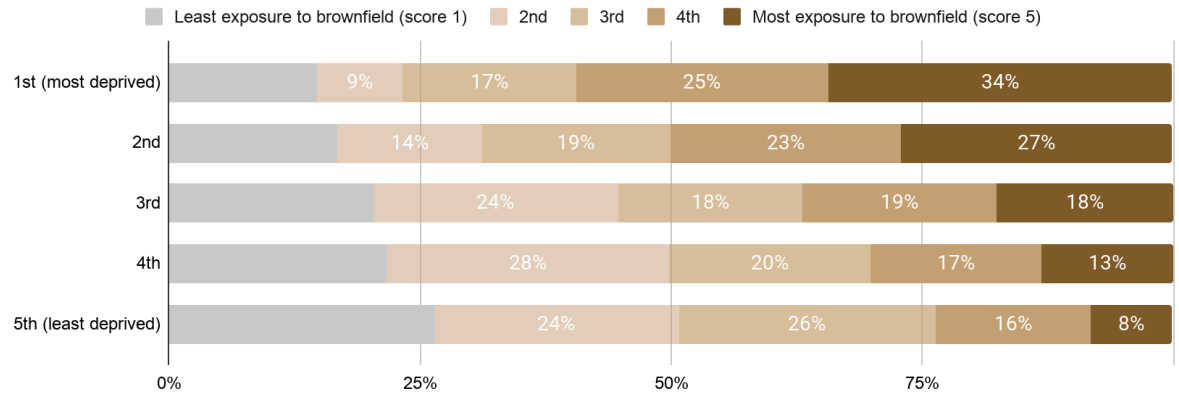

Figure 6: *A stacked horizontal bar plot illustrating the significant increase in exposure to brownfield between deprived and affluent areas in England.*

The Government's Brownfield Land Register currently lists 35,880 sites in England, covering around 37,750ha — the equivalent of more than 53,000 football pitches — with stated capacity for between 1.31 and 1.41 million new homes. However, the average brownfield site is relatively small, at approximately 1.1ha (calculated through approximation of data from CPRE), meaning that higher exemption thresholds, such as the 2.5ha being proposed by the Government, would capture a large proportion of sites.[14]

A blanket residential brownfield exemption would mean BNG could be sidestepped across this entire pipeline, and would also risk locking in poor access to nature for the future populations moving into these developments. This is because brownfield housing capacity is heavily concentrated in deprived areas.

The most deprived 20% of neighbourhoods contain 23.5% of all brownfield hectares and 30.4% of England's stated brownfield housing capacity (around 430,000 of the 1.41 million potential dwellings). The least deprived 20%, on the flipside, contain just 14.4% of brownfield hectares and 8% of stated capacity, meaning around four times more potential brownfield homes are concentrated in the most deprived fifth of England than in the most affluent fifth.

On average, more than half (53%) of land in the most deprived 10% of neighbourhoods sits within 300m of a registered brownfield site, compared with under a fifth (18%) in the least deprived 10%. Over half (51%) of the most deprived neighbourhoods in England contain at least one registered brownfield site within their boundary, against less than a third (29%) of the least deprived.

Taking these figures into account alongside the trend of affluent neighbourhoods being far more likely to already enjoy strong biodiversity access, the proposal to exempt brownfield sites up to 2.5ha from BNG requirements means that those living in the most deprived and least biodiverse communities, risk even further nature decline.

[14] CPRE, State of Brownfield report, September 2025 (link)

A 2.5ha brownfield exemption would create huge areas of ecological desert, restricting access to nature for the poorest in the country, further exacerbating inequality.

Case Study: Birmingham

Birmingham alone accounts for close to 9% of England's stated maximum brownfield housing capacity — a blanket brownfield exemption would mean none of this capacity would be required to deliver biodiversity gain on-site. Birmingham, like Croydon, is an area of extreme nature inequality. While it holds the title of the UK's first 'Nature City' and boasts one of the largest urban nature reserves in Europe, much of the inner-city wards are severely nature-deprived. [15, 16]

Approximately 43% of Birmingham's population live in areas that are ranked in the 10% most deprived nationally — any BNG exemption for brownfield sites would worsen access to nature in a city where almost half the population already cannot easily access green spaces.

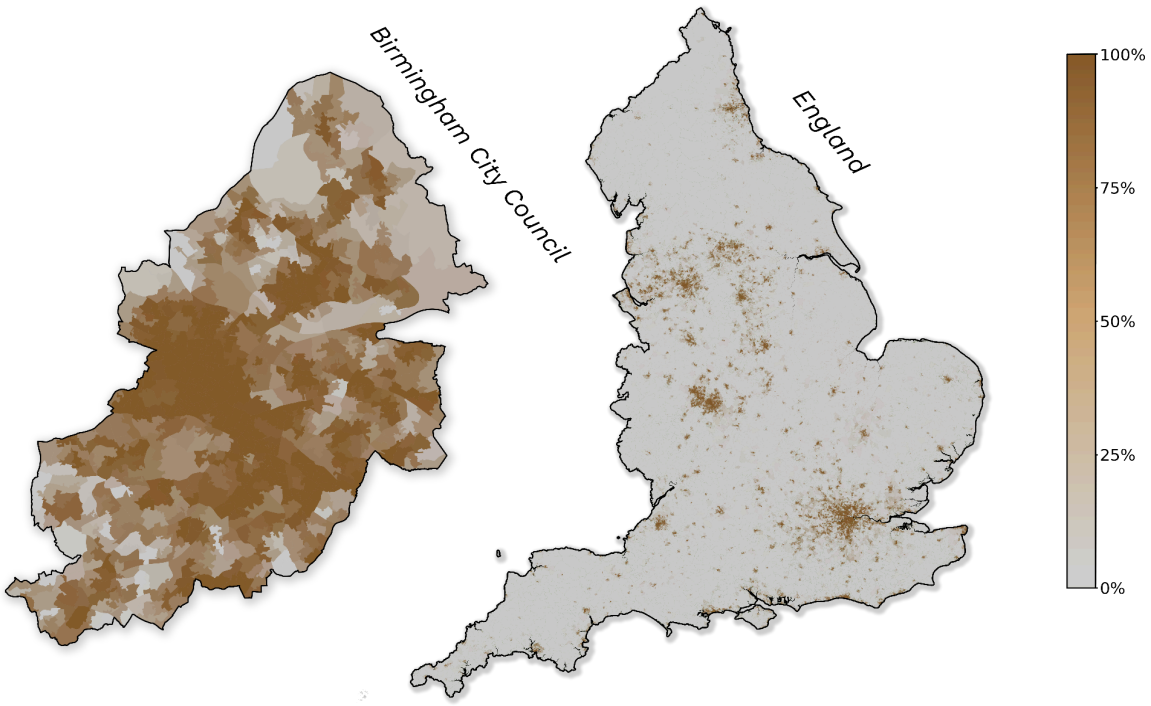

Figure 7: *Neighborhood level map (LSOA) of England and Birmingham City Council showing the spatial inequality in the spread of brownfield land across the UK*

[15] Birmingham City Council, Birmingham becomes UK's first Nature City, July 2025 (link)
[16] Birmingham City Council, Sutton Park, March 2026 (link)

Recommendations and Conclusion

The evidence presented reveals a stark and systemic reality: England's most socio-economically deprived communities face profound nature poverty, a crisis being further exacerbated through expanding BNG policy exemptions.

Granular data shows that 7.4 million people live in areas devoid of immediate biodiversity, with a heavily pronounced deprivation gradient driven by extreme disparities within urban towns and cities. Despite these existing inequalities, current and proposed BNG exemptions disproportionately strip environmental protections from the very communities that need them the most.

The recent exemption for small sites under 0.2ha removes biodiversity obligations from up to 82% of development applications in the most deprived local authorities, threatening an ecological loss equivalent to 11,000 mature trees. Compounding this, the widespread exploitation of the de minimis exemption has seen an 81% surge of its use nationwide, with its growth heavily concentrated in struggling urban councils. The proposed 2.5ha residential brownfield exemption currently being considered by the Government threatens to further accelerate this decline, removing BNG obligations in already deprived inner-city areas that contain four times more potential brownfield housing capacity than affluent areas.

To prevent the creation of widespread urban ecological deserts, and protect and enhance access to nature for the most deprived communities in the country, we are calling on the Government to:

- **Commit to introducing a statutory Equality Impact Assessment for all BNG frameworks** in the upcoming Access to Nature Green Paper, to ensure existing BNG exemptions do not lead to worse nature outcomes for local communities affected by development.

- **Immediately drop plans to introduce a 2.5ha exemption for residential brownfield sites** to enable a brownfield-first approach to development that unlocks access to nature in the most deprived communities.

- **Tighten the current de minimis exemption threshold** to ensure it is used for its genuine purpose, and not exploited by developers.

- **Review the impact of the forthcoming 0.2ha exemption threshold on the most deprived communities** and consider whether a lower threshold would better serve these communities.

- **Commit to a legally binding minimum 5-year policy lock-in** that protects BNG against any further changes and exemptions.

Without these interventions, planning policy will continue to entrench spatial injustice, permanently locking Britain's most vulnerable populations out of the vital benefits of biodiversity and causing irreparable damage to our environment.

Methodology

This study was commissioned by the Wildlife and Countryside Link. The research was completed by Stack Data Strategy and funded by Woodland Trust, RSPB, CIEEM, Landscape Institute, and Green Earth Developments.

To compile this report, Stack Data Strategy relied on a number of data sets and assumptions. Below, we outline our analysis for each to outline how we have achieved our findings.

On Deprivation

- Our geographic unit of analysis is the Lower Super Output Area (LSOA) using 2021 Census boundaries. England contains 33,755 LSOAs, each designed by the Office for National Statistics to contain roughly 1,500-3,000 residents for the purposes of socio-demographic comparison.
- Biodiversity areas are defined using Natural England's Priority Habitats Inventory (see here), a spatial dataset mapping 27 terrestrial and freshwater habitat types designated under Section 41 of the Natural Environment and Rural Communities Act (2006) as being of principal importance for biodiversity conservation in England.
- A minimum habitat patch size of 0.5HA has been applied to exclude very small fragments unlikely to provide meaningful biodiversity. This threshold matches the World Health Organisation's recommended minimum size for functionally usable greenspace, and retains 97.1% of the total habitat area in the underlying Priority Habitats Inventory while excluding 48% of polygons by count.
- Accessibility is measured using a 300 metre straight-line buffer around each qualifying habitat, in line with Natural England's Accessible Greenspace Standard (formerly ANGSt) (see here), which sets 300m as the maximum distance any resident should have to travel from home to reach a natural greenspace.
- The 'biodiversity access percentage' for each LSOA is calculated as the share of that LSOA's land area falling within 300m of at least one qualifying priority habitat. The analysis intersects 411,632 buffered habitat polygons against all 33,755 LSOAs using spatial indexing to compute geometries efficiently.
- Overlapping habitat buffers within each LSOA are dissolved before area is computed, ensuring that land within 300m of multiple habitats is counted once rather than being double-counted.
- A 1-5 biodiversity score assigned using rank-based quintile binning across all English LSOAs, each score band contains exactly 20% of LSOAs, with Score 1 representing the lowest access and Score 5 the highest. The rank-based approach avoids distortion from the 13% of LSOAs that sit at zero access, which would break percentile binning.
- Deprivation is measured using the Indices of Multiple Deprivation (IoD) 2025, published by the Ministry of Housing, Communities and Local Government (see here). The overall IMD score and

decile rank are used as the primary deprivation metric, with IMD quintiles derived by grouping deciles in pairs (deciles 1-2 forming the most deprived quintile, deciles 9-10 the least).

- The rural/urban classification is taken from the 2021 ONS Rural-Urban Classification at LSOA level (see here), which categorises each LSOA based on settlement size and population density.
- Population estimates are ONS Mid-2022 mid-year figures at LSOA level, sourced from the IoD 2025 supporting tables.
- Statistical associations are tested using Spearman rank correlation rather than Pearson, as the underlying biodiversity coverage distribution is heavily right-skewed and contains a significant number of LSOAs with 0% coverage, rank-based methods are more robust to these characteristics.
- We have excluded the City of London from parts of the Local Authority-level analysis where appropriate, as its exceptionally small resident population (fewer than 6,000 residents, compared with a typical LAD population of around ~190,000) and highly atypical land use profile make it poorly comparable to conventional residential local authorities elsewhere in England.

On De Minimis

- To assess whether use of the de minimis exemption is changing meaningfully over time, monthly exemption data was analysed at local planning jurisdiction level for the period February 2024 to February 2025, covering the first full year of mandatory BNG implementation. Two complementary statistical models were fitted to each council-exemption pairing.
- The first model estimates whether the raw monthly count of each exemption type is rising or falling within a given council. This is fitted as a Poisson generalised linear model with heteroskedasticity-robust standard errors, regressing the monthly exemption count on a monthly time index. The resulting coefficient is interpreted as the modelled multiplicative change per month in the count of that exemption type. This model captures whether the absolute number of de minimis claims is increasing, regardless of how the total exemption volume in that council is changing.
- The second model estimates whether each exemption type is becoming a larger or smaller share of all exemptions recorded in that council over time. This is fitted as a binomial logistic regression with the exemption count as the numerator and total monthly exemptions as the denominator, weighted by the total to avoid overinterpreting noisy month-to-month changes in low-volume areas. This captures whether de minimis is becoming a larger share of the exemption mix, even if overall exemption volumes are flat.
- Both models report results as the modelled change between the start and end of the period, alongside a statistical significance test. To avoid overstating significance when running many tests across councils and exemption types. Trends are described as statistically significant only where the adjusted p-value is below 0.05. Councils with fewer than six monthly observations, fewer than ten total exemptions of that type across the period, or fewer than two months with any non-zero observations were excluded from significance testing as having insufficient data to fit a meaningful trend.

- National-level trends were estimated using the same Poisson specification applied to the sum of exemptions across all councils for each month, providing an aggregate view alongside the council-level results.
- Total application figures used for share calculations are taken from the eftec (2025) analysis of Planning Portal data, which reports 111,575 planning applications between February 2024 and February 2025 (raw), 110,911 after data cleaning, and 101,728 across the March 2024 to February 2025 analytical window once pre-BNG transitional applications and infeasible records were removed. The 101,728 figure is used for share-of-applications calculations to maintain consistency with the eftec baseline.
- To examine whether heavy de minimis use is concentrated in more deprived areas, the council-level exemption data was joined to the Indices of Multiple Deprivation 2025 dataset published by the Ministry of Housing, Communities and Local Government. Deprivation data is published at Lower Super Output Area (LSOA) level, this was then aggregated up to Local Authority District (LAD) level using a population-weighted mean of each LSOA's IMD score, weighted by ONS Mid-2022 LSOA population estimates. Population, child (0-15) and older-resident (60+) counts
- Council-level entities that do not correspond to standard Local Authority Districts in IMD 2025 were excluded from the deprivation analysis: this includes county councils, urban development corporations (e.g. Hartlepool, Middlesbrough and London Legacy Development Corporations), national park authorities (e.g. Exmoor National Park) and other special-purpose planning authorities (e.g. the Broads Authority). Deprivation data is not published for these authorities at LAD level because their boundaries do not nest cleanly inside standard LAD geography. Note that some of the LADs excluded here saw statistically significant increases in de minimis use in the wider trend analysis presented above (e.g. Derbyshire County Council, Exmoor National Park), so the deprivation analysis is restricted to a subset of the LADs in the full trend dataset.
- Spearman rank correlations were used rather than Pearson, mirroring the approach taken in the biodiversity access analysis and the trend analysis, for consistency and robustness to skew.
- LADs were grouped into quintiles by their population-weighted IMD score, with quintile 1 representing the most deprived 20% of LADs in the analysis set and quintile 5 the least deprived.

On Small Sites

- The analysis uses Local Authority Districts as the geographic unit, matching the site-size data to LAD-level deprivation metrics.
- The small site measure is based on the share of planning applications falling below 0.2HA. This combines applications in the 0-0.1ha and 0.11-0.2ha bands into a single combined percent under exemption measure.
- The analysis assumes that applications below 0.2HA are the relevant proxy for developments that could fall within the proposed small site exemption. It does not assume that every site below 0.2HA would necessarily be exempt in practice (some may overlap with priority habitats for example), only that these are the sites most directly exposed to the proposed threshold.

- Deprivation is again measured using the population-weighted LAD average of the Index of Multiple Deprivation score. This means each LAD's deprivation score reflects the deprivation levels of its LSOAs, weighted by population.
- The headline quintile figures are weighted by total planning applications, so areas with larger numbers of applications contribute proportionately more to the overall estimate.
- Statistical association is tested using Spearman rank correlation rather than Pearson correlation. This is appropriate because the relationship is not assumed to be perfectly linear, and the small-site share distribution is likely to be skewed.
- The Biodiversity Unit estimate is derived directly from the eftec (2025) Planning Portal dataset covering applications submitted between February 2024 and February 2025. The dataset includes estimated Biodiversity Unit values associated with planning applications, alongside site-size bands. Applications in the 0-0.1ha and 0.11-0.2ha categories were combined to estimate the total Biodiversity Unit value associated with developments below the proposed 0.2 hectare exemption threshold. For the year the dataset covers, these smaller applications account for an estimated 2,251 Biodiversity Units nationally.
- The report converts this figure into illustrative real-world equivalents to aid interpretation. The "11,000 mature trees" comparison assumes a typical mature tree value of approximately 0.21 Biodiversity Units under the statutory biodiversity metric, while the "400 football pitches of wildflower meadow" comparison assumes approximately 5.7 Biodiversity Units per football pitch-sized area of moderate-condition lowland meadow habitat. These equivalences are illustrative only and are intended to communicate the approximate scale of biodiversity value potentially affected, rather than represent a likely habitat conversion.
- The findings should be interpreted as evidence of disproportionate exposure to the proposed small site threshold, rather than as a direct estimate of biodiversity loss. The policy relevance is that the exemption would apply most heavily in the very places already more likely to experience deprivation and weaker access to high-quality nature.