

The Rt Hon Mary Creagh
Parliamentary Under-Secretary of State at the Department of Environment, Food & Rural Affairs
Seacole Building
2 Marsham St
London
SW1P 4DF

The Rt Hon Matthew Pennycook
Minister of State at the Ministry of Housing, Communities and Local Government
2 Marsham St
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Sent by email

2nd April 2025

Dear Ministers,

One year on from the introduction of mandatory Biodiversity Net Gain (BNG) for small sites, we are writing to express our concerns as professional bodies collectively representing over 15,000 ecologists and environmental professionals.

BNG is not currently working for small sites. This is the message from our members and is set out in detail in [BNG for Small Sites](#) and [BNG in Practice: One Year after Mandatory Implementation](#).

To meet the BNG requirement, small site developers have to go through a simplified BNG process, which includes requirements for securing a baseline biodiversity metric calculation, and often the purchase of prohibitively expensive off-site biodiversity credits. The majority of biodiversity gains on small sites also have no monitoring requirement and so are at high risk of not being maintained over the required 30 year period.

We support the introduction of a levy for small sites to simplify and accelerate small site development. One option could be to incorporate the levy into the newly announced Nature Restoration Fund system, provided there is robust and transparent accountability for the discharge of this funding on nature gains. This would enable small site developers to follow a simple charging schedule to fulfil their BNG requirements.

The current small sites system is over-complicated and impractical, imposing a disproportionate burden on small developers and further stretching the already limited capacity of ecologists and Local Planning Authorities. Small developments add up; they must support nature recovery and a levy is a more effective and strategic way to achieve this.

We also want to reiterate our strong commitment and support for BNG. We have been highly concerned to hear reports that Defra has been considering its removal. BNG is a world leading piece of legislation that has the potential to be a huge success for development and nature recovery, if [action is taken now to address implementation issues](#). As professional bodies, we are keen to work with the Government to overcome these challenges, and support its vision of a modern planning system that delivers high-quality development together with meaningful nature recovery.

Yours sincerely,
Iain Bouton, Vice-Chair, ALGE
Ellie Savage, Policy Officer, IES
Jason Reeves, Head of Policy, CIEEM