

Appendix X: Guidance on No Net Loss for Developments Outside the Mandatory BNG Regime

No Net loss for minor development, Change of Use, and small-scale commercial development

This guidance supports Tamworth's *No Net Loss* approach for minor residential developments of **1–9 dwellings**, which may become exempt from mandatory Biodiversity Net Gain (BNG) under forthcoming national changes. Although these schemes may fall outside the statutory BNG regime, they can still result in meaningful biodiversity loss. Small development sites often contain a mix of semi-natural, previously developed, and boundary habitats that contribute to the local ecological network.

This note provides a **simple, proportionate method** for identifying baseline habitats and selecting suitable on-site enhancements to ensure that development achieves **No Net Loss** as a minimum.

Habitats Commonly Found on these Development Sites

Minor development sites are more varied than domestic gardens. They may include garden-type habitats, but can also contain semi-natural or previously developed habitats with higher ecological value.

Applicants should identify which of the following are present:

Garden-type or managed habitats	Semi-natural habitats	Previously developed / brownfield habitats
Vegetated garden / amenity grassland Ornamental shrubs Small ponds	Rough grassland Naturalised scrub Woodland-edge vegetation Species-rich grassland	Rubble, bare ground, or spoil Ephemeral/short-lived vegetation

Domestic hedges Scattered small trees	Native hedgerows Wet depressions or seasonal ponds Scattered mature trees	Brownfield mosaic habitat Disused allotments or overgrown plots Hardstanding with natural colonisation
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These habitats vary in ecological value. The indicative figures below provide a proportionate way to estimate biodiversity losses and gains

Indicative Biodiversity Values for Common Small-Site Habitats

Habitat Type	Indicative Biodiversity Value
Vegetated garden / amenity grassland	0.00004 units per m²
Rough grassland	0.00028 units per m²
Naturalised scrub / woodland-edge habitat	0.00028 units per m²
Species-rich grassland	0.00048 units per m²
Pond (with native aquatic planting)	0.00042 units per m²
Native hedgerow (linear feature)	0.0028 units per metre
Hardstanding / sealed surfaces	0 units per m²
Brownfield mosaic habitat	<i>Higher value — applicants should describe the habitat and provide justification if present</i>

This list covers the majority of habitats likely to be encountered on minor development sites. Where a habitat falls outside these categories, applicants should provide a short description and a simple justification for how they have assessed its value.

Typical Biodiversity Loss on these Development Sites

Losses may include:

- Removal of amenity grassland
- Clearance of scrub or rough grassland
- Loss of boundary hedgerows

- Removal of small ponds or wet hollows
- Loss of brownfield mosaic habitat
- Removal of scattered trees

Applicants should measure the area or length of each habitat to be removed and multiply by the relevant value.

Indicative Biodiversity Value of Common Enhancements

These enhancements are suitable for minor development sites and can be used to offset biodiversity losses.

Enhancement	Value
Species-Rich Grassland	• 20 m² → 0.0096 units • 50 m² → 0.024 units
Wildlife Pond	• 6 m² → 0.00252 units • 10 m² → 0.0042 units
Native Hedgerow	• 10 m → 0.028 units • 20 m → 0.056 units
Naturalised Scrub / Woodland-Edge Planting	• 20 m² → 0.0056 units • 40 m² → 0.0112 units
Rough Grass Margins	• 10 m² → 0.0028 units • 25 m² → 0.007 units
Native Tree Planting	• One newly planted native tree → approx. 0.02 units

Recommended Minimum Sizes for Ecological Function

To ensure enhancements deliver meaningful ecological benefits:

- **Species-rich grassland:** minimum **10–20 m²**
- **Ponds:** minimum **4–6 m²**
- **Native hedgerow:** minimum **5–10 m**
- **Scrub / woodland edge:** minimum **10 m²**
- **Rough grass margins:** minimum **1 m width** and **5 m length**

These thresholds help avoid tokenistic enhancements that provide limited ecological value.

Demonstrating No Net Loss

Applicants should:

1. **Identify** the habitats to be removed.
2. **Calculate** the biodiversity value using the indicative figures.
3. **Select enhancements** that meet or exceed the lost value.
4. **Provide a short statement** explaining how No Net Loss is achieved.

This proportionate approach ensures that minor development contributes positively to nature recovery across Tamworth while avoiding unnecessary burdens on applicants.

No Net Loss for major development outside the scope of mandatory BNG

This guidance supports Tamworth's *No Net Loss* approach for residential developments of **10+ dwellings or commercial development**, which may be exempt from mandatory Biodiversity Net Gain (BNG). Although these schemes may fall outside the statutory BNG regime, they often occupy land containing semi-natural, agricultural, or brownfield habitats that contribute meaningfully to the local ecological network.

This note provides a **proportionate, transparent method** for identifying baseline habitats and selecting suitable on-site enhancements to ensure that development achieves **No Net Loss** as a minimum.

Habitats Commonly Found on 10–49 Dwelling (or equivalent) Sites

Sites of this scale are more diverse than domestic gardens or small infill plots. They may include a mix of agricultural, semi-natural, and previously developed habitats.

Agricultural and Green Belt / Grey Belt Habitats	Semi-Natural Habitats	Brownfield and Previously Developed Land
• Arable land (often low ecological value but may support field margins) • Improved grassland • Semi-improved neutral grassland • Field margins and buffer strips • Native hedgerows (often species-rich and historic) • Scattered mature trees • Ditches and wet depressions • Ponds (farm ponds, seasonal ponds, attenuation basins)	• Rough grassland • Naturalised scrub • Woodland-edge vegetation • Small copses or tree belts • Species-rich grassland (occasionally present on older pasture) • Hedgerow networks	• Rubble, spoil, bare ground • Ephemeral/short-lived vegetation • Brownfield mosaic habitat (high distinctiveness) • Colonised hardstanding • Disused allotments or small industrial plots

These habitats vary in ecological value. The indicative figures below provide a proportionate way to estimate biodiversity losses and gains.

Indicative Biodiversity Values

Habitat Type	Indicative Biodiversity Value
Arable land	0.00004 units per m²
Improved grassland	0.00004 units per m²
Semi-improved grassland	0.00028 units per m²
Rough grassland	0.00028 units per m²
Naturalised scrub / woodland-edge habitat	0.00028 units per m²
Species-rich grassland	0.00048 units per m²
Pond (with native aquatic planting)	0.00042 units per m²
Native hedgerow (linear feature)	0.0028 units per metre
Hardstanding / sealed surfaces	0 units per m²

Nature-friendly SuDS	0.00028 units/m²
Brownfield mosaic habitat	<i>Higher value — applicants should describe and justify if present</i>
Open mosaic habitat (OMH)	0.0012 units per m² <i>As a rule of thumb the loss of 30m² of open mosaic habitat is equivalent to 2 trees or 13m of native hedgerow</i>

These values cover the majority of habitats likely to be encountered on 10–49 dwelling sites. Where a habitat falls outside this list, applicants should provide a short description and a simple justification for how they have assessed its value.

Typical Biodiversity Loss on Sites of This Scale

Losses may include:

- Removal of arable or improved grassland
- Loss of semi-improved grassland or rough grassland
- Clearance of scrub or woodland-edge habitat
- Removal of hedgerows or tree belts
- Loss of ponds, ditches, or wet depressions
- Loss of brownfield mosaic habitat
- Removal of scattered mature trees

Applicants should measure the area or length of each habitat to be removed and multiply by the relevant value.

Indicative Biodiversity Value of Common Enhancements

These enhancements are suitable for 10–49 dwelling sites and can be used to offset biodiversity losses.

Enhancement	Value
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Species-Rich Grassland	• 50 m² → 0.024 units • 100 m² → 0.048 units
Wildlife Pond	• 10 m² → 0.0042 units • 20 m² → 0.0084 units
Native Hedgerow	• 20 m → 0.056 units • 50 m → 0.14 units
Naturalised Scrub / Woodland-Edge Planting	• 50 m² → 0.014 units • 100 m² → 0.028 units
Rough Grass Margins	• 25 m² → 0.007 units • 50 m² → 0.014 units
Native Tree Planting	• One newly planted native tree → approx. 0.02 units • A small copse (10 trees) → approx. 0.2 units
Nature Friendly SuDS Include only SuDS with ecological function, such as: • Wet swales • Wet or dry attenuation basins with native planting • Rain gardens • Bioretention areas • Wetland scrapes • Filter strips with native vegetation	Recommended indicative value: • 0.00028 units per m² (same as rough grassland / scrub)

Recommended Minimum Sizes for Ecological Function

To ensure enhancements deliver meaningful ecological benefits:

- **Species-rich grassland:** minimum **20–50 m²**
- **Ponds:** minimum **6–10 m²**
- **Native hedgerow:** minimum **10–20 m**
- **Scrub / woodland edge:** minimum **20 m²**
- **Rough grass margins:** minimum **1–2 m width** and **10 m length**
- **Tree planting:** minimum **5–10 native trees** for a meaningful copse

These thresholds help avoid tokenistic enhancements that provide limited ecological value.

Demonstrating No Net Loss

Applicants should:

1. **Identify** the habitats to be removed.
2. **Calculate** the biodiversity value using the indicative figures. The small sites metric will also be accepted.
3. **Select enhancements** that meet or exceed the lost value.
4. **Provide a short statement** explaining how No Net Loss is achieved.

This proportionate approach ensures that small residential developments contribute positively to nature recovery across Tamworth while avoiding unnecessary burdens on applicants.