



# ENVIRONMENTAL POLICY FORUM

**c/o Society for the Environment  
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[www.envpolicyforum.org.uk](http://www.envpolicyforum.org.uk)

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The Rt Hon Emma Reynolds  
Secretary of State for Environment, Food & Rural Affairs  
Seacole Building  
2 Marsham St  
London  
SW1P 4DF

The Rt Hon Steve Reed  
Secretary of State for Housing, Communities and Local Government  
Fry Building  
2 Marsham St  
London  
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*Sent by email*

18 December 2025

**Re: BNG requirements for small sites**

Dear Secretaries of State,

We are writing as a coalition of environmental professional bodies and learned societies to express our concerns following the Government's recent announcement that it will introduce an area-based exemption from mandatory Biodiversity Net Gain (BNG) for smaller sites up to 0.2 hectares.

We are concerned that the exemption announced materially weakens one of the UK's most important nature-recovery policies and undermines confidence among the organisations, professionals, and businesses that have already invested heavily in its implementation. In

particular, we are concerned that no evidence has yet been published by Government to explain how and why the 0.2 hectare threshold was selected.

### **Exemptions seriously damage nature recovery**

BNG is a cornerstone of the Government's strategy to restore and enhance nature across England. The evidence shows that exempting smaller sites up to 0.2 hectares could remove around 82% of planning applications from BNG requirements, significantly impacting the effectiveness of the policy and its potential to deliver meaningful biodiversity gains.<sup>1</sup>

Beyond their individual scale, small sites not only "add up" and cumulatively make a real difference, they also often provide essential connections between larger habitats, acting as green corridors which support wildlife movement and resilience. Some contain priority habitats, such as ancient woodland, species-rich grasslands, and saltmarshes, which are irreplaceable and must be protected. They also provide much-needed green spaces for nature-poor urban communities, contributing to health, wellbeing, and quality of life.

There will also be lost opportunities for watercourse enhancement by the exempting of these small areas where they include a watercourse and its riparian zone from application of the BNG watercourse metric.

### **Exemptions undermine investment and growth**

BNG is one of the UK's most effective tools for mobilising private finance for habitat creation, supporting jobs, and driving green economic growth. Environmental professionals overwhelmingly support maintaining a strong, consistent policy framework.

The exemption announced destabilises the emerging biodiversity finance market, reducing private investment at a critical point in its development. It risks severely weakening confidence and unfairly disadvantages responsible developers, SMEs, and entrepreneurs, who have invested significantly in preparing for, delivering and complying with BNG.

In the spirit of transparency, we urge the Government to publish the evidence and impact assessments for this decision and, going forward, to adopt an evidence-based, proportionate and consistent approach that supports both nature recovery and sustainable development.

Environmental professionals stand ready to work alongside the Government, developers, and local communities to make this happen. We would welcome the opportunity to meet with you to discuss this further, and to identify how we can help deliver the outcomes which you are seeking.

Yours Sincerely,

Professor William Pope FIEnvSci, HonFSE, CEnv, CSci  
Chair, Environmental Policy Forum

Sarah Ridgeon MCIPR  
Secretariat, Environmental Policy Forum

Signed on behalf of the following organisations:

Dr Phil McCluskey,  
Senior Policy & External Affairs Manager,  
British Ecological Society



Amanda Williams,  
Head of Environmental Sustainability,  
Chartered Institute of Building



Jason Reeves,  
Head of Policy, Chartered Institute of Ecology  
and Environmental Management



Alastair Chisholm,  
Director of Policy,  
Chartered Institution of Water and  
Environmental Management



Louise Simpson,  
CEO, Institute of Chartered Foresters



Paul Coulson,  
Chief Executive, Institute of Fisheries  
Management



Lesley Wilson,  
Policy and Engagement Lead, The Institute of  
Sustainability and Environmental  
Professionals



Joseph Lewis,  
Head of Policy, Institution of Environmental  
Sciences



Billy Piper,  
Secretary, Sustainability Forum, Institution of  
Royal Engineers



Carolyn Göhler,  
President, Landscape Institute



Dr Emma Wilcox,  
Chief Executive, Society for the Environment



### Notes:

1. The British Ecological Society (BES) is the largest scientific society for ecologists in Europe with a membership of 7,000 in over 120 countries around the world. We support the ecology community at all stages of their careers through our journals, meetings, grants, and education and policy work. The first ecology society to be established anywhere in the world, we have been the champion of ecology for more than a century. [britishecologicalsociety.org](http://britishecologicalsociety.org)
2. The Chartered Institute of Building (CIOB) are the world's largest and most influential professional body for construction management and leadership. Our members work worldwide in the development, conservation, and improvement of the built environment. We accredit university degrees, educational courses, and training. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets. [ciob.org](http://ciob.org)

3. The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional membership body representing and supporting over 7,300 ecologists and environmental managers in the UK, Ireland and abroad. Their vision is of a society which values the natural environment and recognises the contribution of professional ecologists and environmental managers to its conservation. [cieem.net](http://cieem.net)
4. The Chartered Institution of Water and Environmental Management (CIWEM), is the leading independent Chartered professional body for water and environment professionals, promoting excellence within the sector. [ciwem.org](http://ciwem.org)
5. The Institute of Chartered Foresters (ICF) is the Royal Chartered home for tree professionals across the UK. It is the only UK body to offer both Chartered Forester and Chartered Arboriculturist titles. As part of its ongoing strategic objectives, the Institute regulates standards of entry to the profession; supports members and provides guidance to professionals in other sectors; offers educational advice and training to both students and tree professionals seeking to develop their careers and works to foster a greater public awareness and understanding of forestry and arboriculture. [charteredforesters.org](http://charteredforesters.org)
6. The Institute of Fisheries Management (IFM) is an international organisation of people whose aim is to support and promote sustainable fisheries management for the benefit of our members, fisheries, wildlife and society. [ifm.org.uk](http://ifm.org.uk)
7. The Institute of Sustainability and Environmental Professionals (ISEP) is the global membership body that sets the standard for anyone wanting sustainable change that delivers for the environment, society and the economy. [isepglobal.org](http://isepglobal.org)
8. The Institution of Environmental Sciences (the IES) is at the forefront of uniting the environmental sciences around a shared goal: to work with speed, vision and expertise to solve the world's most pressing environmental challenges, together. As the global professional membership body for environmental scientists, we support a diverse network of professionals all over the world – and at every stage of their education and careers – to connect, develop, progress and inspire. [the-ies.org](http://the-ies.org)
9. The Institution of Royal Engineers (InstRE), established in 1875 and granted a Royal Charter in 1923, serves as a professional and learned society dedicated to advancing military engineering. With a membership exceeding 10,000 individuals, comprising both serving and retired personnel from the Corps of Royal Engineers and allied international military engineers, InstRE promotes the art and science of military engineering through professional development, publications, and events. It supports engineering excellence by facilitating professional registration, innovation and sustainable outcomes, alongside maintaining historical archives and museum of engineering, thereby enhancing the operational effectiveness and heritage of military engineering. [instre.org](http://instre.org)
10. The Landscape Institute (LI) is the chartered body for the landscape profession. It is an educational charity working to promote the art and science of landscape practice. The LI's aim, through the work of its members, is to protect, conserve and enhance the natural and

built environment for the public benefit. The Landscape Institute provides a professional home for all landscape practitioners including landscape scientists, landscape planners, landscape architects, landscape managers and urban designers. [landscapeinstitute.org](https://landscapeinstitute.org)

11. The Society for the Environment (SocEnv) defines the standards for professional competence in environmental practice, ensuring key decisions are made by verified professionals. Having received a Royal Charter in 2004, we license professional institutions to award the Chartered Environmentalist (CEnv), Registered Environmental Practitioner (REnvP) and Registered Environmental Technician (REnvTech) professional registrations. There are now over 8,500 registered environmental professionals, sharing a common vision of delivering a sustainable future shaped by environmental professionalism. [socenv.org.uk](https://socenv.org.uk)

#### Endnotes

- 1 <https://www.wcl.org.uk/better-solution-for-nature-and-development-than-bng-proposals.asp>