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Rt Hon Emma Reynolds MP,
Secretary of State for Environment, Food and Rural Affairs

Rt Hon Steve Reed MP,
Secretary of State for Housing, Communities and Local Government
2 Marsham Street, Westminster, London SW1P 4DF

17 November 2025

Biodiversity net gain exemptions

Dear Secretary of State,

Exempting small sites from Biodiversity Net Gain would be ruinous for England's main nature market. We write in anticipation that your response to the *Improving the implementation of Biodiversity Net Gain* consultation, which closed on 24 July, will be published soon.

Since the consultation was published, confidence in the market has plummeted. Work by Eftec, commissioned by The Lifescape Project and Wildlife & Countryside Link, demonstrates the potential harm to the system if small sites were excluded. The research shows that if sites under 0.5 hectares were excluded from the system, 97% of applications would not be covered by the system. The rump regulations that remain would likely be too narrow to support a viable market or to contribute to nature's recovery.

Many land managers have already made significant investments in BNG unit creation, making business decisions on the basis of existing regulations. Those investments could easily be left stranded if demand for off-site units is undermined by the proposed exemptions. Confidence to invest in further biodiversity enhancements is already shaken, just as the market was beginning to mature.

There is a £4–5 billion annual shortfall in investment in nature recovery in the UK and the Government has set out positive plans to raise £1bn in private finance each year. The BNG market is currently the only growing national compliance market in operation, providing important income for wildlife-friendly farmers and land managers as well as restoring biodiversity. It is critical for the achievement of nature-recovery alongside sustainable development. It also offers significant potential for job creation, especially in rural areas. Pulling the regulatory rug from under the market now would leave these ambitions in tatters.

Instead, the Government should close existing loopholes (such as self-declaration of no impact) and move forward with its positive plans for biodiversity net gain for major infrastructure. There are opportunities to simplify the system for the very smallest sites and environmental projects without undermining the wider system. Biodiversity net gain has the potential to be a world-leading exemplar of a compliance market for nature that supports sustainable growth. Please don't shatter the system just as it is beginning to thrive.

Yours sincerely,

Hilary McGrady, Director General, The National Trust

Mark Clayton, CEO, Triodos Bank UK

Guy Thompson, Managing Director, EnTrade

Catherine Spitzer, CEO, Environment Bank

Archi Struthers, CEO, Nattergal

Darren Moorcroft, CEO, The Woodland Trust

Jonathan Withey, Director & Co founder, Nature Thrive Ltd

Benjamin Kite, Group Strategy Director, Ecological Planning & Research Ltd

Sally Haynes, CEO, CIEEM

Craig Macadam, Conservation Director, Buglife

Dr Stephanie Wray, Director, RSK Nature Repair

Gill Perkins, CEO, Bumblebee Conservation Trust

Dr Mark Jones, Head of Policy, Born Free Foundation

Simon Towers, Co-Chairman, Green Earth Developments Group

Andrew Hicks, CEO, Biodiversity Exchange Ltd

Tom Nelson, Director, Nature Impact Ltd

Ben Taylor, Managing Director, The Ilford Estate

Erica Kemp, Director, Envance

Jim Phillips, Managing Director, Ethos

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Simon Parrington, Founder and Group CEO, Celnor

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Alex Begg, Director, Swallowtail Consulting Ltd

Isabella Tree, Knepp Estate

Charlie Burrell, Knepp Estate

Jon Davies, Director, RSK Wilding

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Dick Jeavons-Fellows, Small Habitat Company

Sue Sayer MBE, Seal Research Trust

Julie Williams, CEO, Butterfly Conservation

Molly Biddell, Hampton Estate

Dr Andrew Terry, Director of Conservation and Policy, Zoological Society of London

Emma Slawinski, CEO, League Against Cruel Sports

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Jonathan Worthy-Pauling, Director, PAN UK

Matt Larsen-Daw, CEO, The Mammal Society

Rebecca Wrigley, CEO, Rewilding Britain

Professor Jeremy Biggs, CEO, Freshwater Habitats Trust

Julian Woolford, CEO, Staffordshire Wildlife Trust

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Christine Luxton, CEO, Suffolk Wildlife Trust

Rich Bates, CEO, Essex Wildlife Trust

Dr Tom Burditt, CEO, The Wildlife Trust for Lancashire, Manchester and North Merseyside

Taras Bains, Global Youth Biodiversity Network UK (GYBN UK)

James Wallace, CEO, River Action

Jane Madgwick, CEO, Plantlife

Adam Donnan, CEO, Institution of Environmental Sciences

Alex Cox, Co-Coordinator, ACAN Ecology

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Chris Packham CBE, Co-Director Wild Justice

Dr Ruth Tingay, CO-Director Wild Justice

Jack Potter, Partner, Wild Capital

Kate Ashbrook, General Secretary, Open Spaces Society

Ben Goldsmith, Chair, The Conservation Collective

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Andy Lester, Head of Conservation, A Rocha UK

Henry Rossiter, Director, Belmont Estate

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Paul Coulson, CEO, Institute of Fisheries Management

Kit Stoner, CEO, Bat Conservation Trust

Chris Butler-Stroud, CEO, Whale and Dolphin Conservation

Craig Bennett, CEO, The Wildlife Trusts

Areeba Hamid and Will McCallum, Co-Executive Directors, Greenpeace UK

Dr Tony Gent, CEO, Amphibian and Reptile Conservation

Professor David Hill CBE DL DPhil(Oxon), Founder, President, Foundation for Nature

Kate Sheldon, CEO, Trees for Cities

Harry Barton, CEO, Earthwatch Europe

Ellen Fay, Executive Director, Sustainable Soils Alliance

Richard Speak, Managing Director, Finance Earth

Tom Tew, CEO, NatureSpace Partnership

Dr Gabriel Connor Streich, CEO, Greenshank Environmental

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