

This checklist sets out a series of activities to inform an implementation plan to prepare for mandatory biodiversity net gain. It aims to set out which activities are contingent on others, but it is not a list of sequential tasks. You can choose which activities you will take forward and when, based on your agreed approach to BNG. Some may occur concurrently and others may work better if they follow those later in the list.						
Theme	LPA activities	What other checklist activities is this activity contingent on?	What priority does this activity have?	What is expected from others to complete this activity - red text for aspects that aren't already available; blue for available; purple for non-mandatory version available	Help from/Useful examples	Hyperlinks
Overarching	Produce a BNG implementation plan to set out the activities you will undertake to get ready for BNG, roles and responsibilities and timelines. Agree this with senior officers and members (as required) and establish appropriate internal governance.	This will be contingent on a number of activities, in particular those under 1. Review, as you will need to decide on your local approach to produce a plan to implement it.	High priority to deliver mandatory BNG			
1. Review						
1.1	Convene a partnership, including those that hold the data and evidence on nature and biodiversity - this might already exist, e.g. through a Local Nature Partnership, Local Environmental Records Centre, County Council or Wildlife Trust (Note: this also links to preparation of your Local Nature Recovery Strategy (LNRS), so find out who the responsible authority is for this.)		Medium priority			GOV.UK - local-nature-recovery-strategies-areas-and-responsible-authorities
1.2	Review how BNG fits with and can deliver your corporate priorities and objectives		Medium priority			
1.3	Review related strategies and plans, e.g. Green Infrastructure strategy, biodiversity opportunity areas, Biodiversity Action Plan, where your LNRS is, as well as existing priority areas for biodiversity to understand how they fit with BNG		Medium priority			
1.4	Review how your Local Plan - vision, policies - and any SPDs fit with BNG, including how existing policy compares to the legislative BNG requirements. Be clear on what are policy requirements and what are legally required.		Required for mandatory BNG	Secondary legislation and guidance - to understand legal requirements - Defra/DLUHC		
1.5	Decide how active you want to be in the BNG market based on your 'risk appetite' towards provision of credits, opportunities on your estate (by roughly assessing the council's estate and understanding how you could provide BNG units), etc and work up a business case, as appropriate. You will also want to consider probity issues if you are taking a very active role. You may also want to consider if your authority should become a responsible body for conservation covenants.		High priority to deliver mandatory BNG	Further details of national credit scheme, including unit pricing - Defra; Guidance for conservation covenant responsible bodies - Defra	PAS network session on off-site BNG - available on PAS BNG network forum	
1.6	Decide on your BNG spatial hierarchy approach (on-site, off-site - where?, then credits) and how you will apply 'strategic significance' and 'spatial risk' under the Biodiversity Metric		High priority to deliver mandatory BNG	Biodiversity Metric good practice guide (available for 4.0 not statutory metric) - NE; Guidance on when it's appropriate for developers to provide BNG on-site, off-site and through credits - Defra	PAS webpages; Bucks strategic approach to BNG document	Interim Strategic Significance and Spatial Risk Guidance for Buckinghamshire
1.7	Formalise the Council's overall local BNG approach through relevant internal sign-off procedures (this may come after in conjunction with activities under Communications). Remember if you are a developer as a council you will also need to include this in your approach.		High priority to deliver mandatory BNG		Working BNG approach, Buckinghamshire C implementation plan - available on PAS BNG network forum	Working guidance on biodiversity net gain
2. Communications						
2.1	Get senior officers/directors on board with the approach and keep them informed throughout.	1.5, 1.6, 1.7	High priority to deliver mandatory BNG			
2.2	Communications with partners, parishes and neighbouring districts, as well as higher tier authorities in relevant areas	1.5, 1.6, 1.7	Lower priority			
2.3	Let planning committee members and other members, including relevant Portfolio holder, know what's happening and how it relates to them and their roles	1.5, 1.6, 1.7	High priority to deliver mandatory BNG			
2.4	Let Head of Planning, planning and enforcement staff know what's happening and how it relates to them and their roles	1.5, 1.6, 1.7	Required for mandatory BNG			
2.5	Depending on your agreed local BNG approach, prepare legal, finance, parks/greenspace, highways, schools colleagues (see also resources and skills below)	1.5, 1.6, 1.7	High priority to deliver mandatory BNG		Buckinghamshire, GMCA	
2.6	Depending on your agreed local BNG approach, do a call for 'green' sites	1.5, 1.6, 1.7	Lower priority		Adur, SDNPA, Bolsover, Basingstoke and Deane	
2.7	Depending on your agreed local BNG approach, explore local habitat banks and BNG unit providers - Wildlife Trust, landowners	1.5, 1.6, 1.7	High priority to deliver mandatory BNG	Further details of national credit scheme, including unit pricing - Defra	Buckinghamshire, GMCA, Hertfordshire	
2.8	Update your intranet and webpages - make sure you consider lead in times for getting information updated on these - and consider how you may want to use regular communications channels for staff and members.	1.5, 1.6, 1.7	High priority to deliver mandatory BNG			
3. Resourcing and skills						
3.1	Depending on your agreed local BNG approach, determine what skills and specialist resource, including ecology, you are likely to need and how you will procure it (i.e. recruitment, SLA, etc), then action this. As a minimum make sure you can cover advice on planning applications.	1.5, 1.6, 1.7	Required for mandatory BNG	Additional funding and new burdens - Defra	PAS resourcing BNG guide; Examples from BNG network on how to decide how much resource you need; ALGE/ADEPT study on resourcing	PAS resourcing biodiversity net gain
3.2	Train planners on how to assess the BNG statement and metric, off-site and credits (spatial hierarchy), how to check the BNG off-site register, any local policy context for decision-making; and when they need to consult an ecological expert internally	1.4	Required for mandatory BNG	Secondary legislation and guidance - Defra/DLUHC; List of exemptions - Defra/DLUHC; Biodiversity Metric good practice guide (available for 4.0 not statutory metric) and metric checklists - NE - see training session from 6 July 2023; BNG statement template and good practice guide - Defra; Other BNG checklists for planners - NE; guidance on applying BNG to phased and minerals development - Defra/DLUHC; Guidance on when it's appropriate for developers to provide BNG on-site, off-site and through credits - Defra; Guidance on the off-site BNG register - Defra; NPPF/PPG? - DLUHC	CIEM/EMA/CIRIA good practice guide; Biodiversity Metric training on PAS website	PAS biodiversity net gain events
3.3	Train planners on when it's appropriate to use conditions and S106 (and how they should incorporate off-site BNG secured through conservation covenant into planning decision-making?)		Required for mandatory BNG		Example conditions and S106 on PAS website	Biodiversity Net Gain in Development Management Local Government Association
3.4	Train planners on how to discharge the pre-commencement condition, by assessing the Biodiversity Gain Plan (and the off-site register?)		Required for mandatory BNG			

3.5	Train planning committee members to understand what questions they need to ask and evidence is needed in relation to BNG, i.e. on the BNG statement and metric, off-site and credits (spatial hierarchy), perhaps as part of annual planning committee training		High priority to deliver mandatory BNG	Biodiversity Metric good practice guide - NE; BNG statement template and good practice guide - Defra; Guidance on when it's appropriate for developers to provide BNG on-site, off-site and through credits - Defra; NPPF/PPG? - DLUHC		
3.6	Train validation officers		Required for mandatory BNG	List of what is needed for BNG at validation stage; Secondary legislation and guidance - Defra/DLUHC; List of exemptions - Defra/DLUHC; BNG statement template and good practice guide - Defra; National validation requirements update - DLUHC; BNG validation/metric checklists - NE		
3.7	Train legal team on S106 for BNG and depending on your agreed approach, other elements of BNG, e.g. legal agreements for habitat banks/Council-owned land, conservation covenants	5.9	High priority to deliver mandatory BNG	List of conservation covenant responsible bodies - Defra; guidance on securing BNG, including LPA role in relation to conservation covenants when they are not the responsible body - Defra/DLUHC	Example S106s on PAS website; BNG practitioner network session with Freeths	Biodiversity Net Gain in Development Management Local Government Association
3.8	Train other teams, as appropriate to your agreed approach, e.g. finance, parks and greenspace, highways, schools, any others that lead Council development	1.7	Medium priority			
3.9	Train relevant staff on monitoring, enforcement and reporting, including enforcement officers (note that enforcement requirements are currently an unknown)		Medium priority	Secondary legislation and guidance - Defra/DLUHC; monitoring and enforcement guidance, including LPA role in relation to conservation covenants when they are not the responsible body - Defra/DLUHC; NERC biodiversity duty guidance - Defra		
4. Establish strategic approach, including internal governance						
4.1	Based on your strategic approach to BNG, develop policy to show how BNG links to other plans, strategies and objectives, including your GI strategy and the relevant Local Nature Recovery Strategy (LNRS), once available	1.7	Medium priority		Examples available on website and through PAS BNG network	PAS Biodiversity Net Gain in Local Plans and Strategic Planning
4.2	With your partnership, establish a biodiversity evidence base - a reasonably up-to-date understanding of the quality and quantity of habitats in their area - this will act as a baseline from which biodiversity gain can be measured. (Note: work on this will be being done for your Local Nature Recovery Strategy, so find out who the responsible authority is for this.)	1.1	Medium priority		Examples available through PAS BNG network	GOV.UK - local-nature-recovery-strategies-areas-and-responsible-authorities
4.3	Decide how best to direct BNG funding to existing priority areas for biodiversity		Medium priority			
4.4	Carry out a rough BNG supply, demand and market readiness assessment, so you can determine how much off-site BNG might be needed in your area and whether the market is ready to deliver what is required.		Medium priority		Examples available through PAS BNG network	
4.5	Formalise your off-site BNG offer: assess and model off-site BNG unit provision for Council estate, map BNG off-site opportunities, and/or develop a brokerage model, etc.	1.5	High priority to deliver mandatory BNG		Examples available through PAS BNG network	
4.6	Establish a framework and standards for off-site BNG providers	1.5	Medium priority		Kent CC, Lincolnshire Wildlife Trust	
4.7	Consider how BNG impacts on site allocations for development. You may also want to allocate sites for nature recovery (see 2.4 above)		Lower priority			
4.8	Where members want to go higher than 10% in Local Plans, explore this with them and be clear on the evidence requirements.		Lower priority		Evidence supporting Guildford Local Plan - 20% BNG	PAS Biodiversity Net Gain in Local Plans and Strategic Planning
4.9	Develop and adopt biodiversity net gain planning policies, setting out local circumstances and requirements, for example, on delivery of off-site biodiversity net gain, either in Local Plan or SPD or both. Make sure you have appropriate evidence to support any requirements that go above mandatory BNG, e.g. 10%+	1.7, 4.1	High priority to deliver mandatory BNG	NPPF and PPG updates - DLUHC	Examples on PAS website	PAS Biodiversity Net Gain in Local Plans and Strategic Planning
5. Development Management						
5.1	Developer guidance note/Technical advice note setting out what you want developers to provide with planning applications and the approach they should take to on-site, off-site and credits - incorporated into local validation checklist/linked to headline requirements in local validation checklist (see also below re validation process).	1.7	High priority to deliver mandatory BNG	Secondary legislation and guidance - Defra/DLUHC; List of exemptions - Defra/DLUHC; Biodiversity Metric good practice guide and checklists - NE; BNG statement template and good practice guide - Defra; Other BNG checklists for planners - NE; guidance on applying BNG to phased and minerals development - Defra/DLUHC; Guidance on when it's appropriate for developers to provide BNG on-site, off-site and through credits - Defra; Guidance on the off-site BNG register - Defra;	Examples on PAS website	Biodiversity Net Gain in Development Management Local Government Association
5.2	Training workshops for applicants, e.g. through local agent/developer forum meetings		Lower priority	As above		
5.3	Review whether implementing BNG - both mandatory and as determined by your BNG approach - will affect IT and mapping systems and update these as required.	1.7	Medium priority	As above; updates to national DM software by relevant providers, e.g. IDOX		
5.4	Integrate BNG into your pre-application service		Medium priority	Secondary legislation and guidance - Defra/DLUHC; List of exemptions - Defra/DLUHC; Biodiversity Metric good practice guide and checklists - NE; BNG statement template and good practice guide - Defra; Other BNG checklists for planners - NE; guidance on applying BNG to phased and minerals development - Defra/DLUHC; Guidance on when it's appropriate for developers to provide BNG on-site, off-site and through credits - Defra; Guidance on the off-site BNG register - Defra;		
5.5	Integrate exemptions, need for BNG statement and metric into your validation process, including local validation requirements, or make sure this is updated for national requirements		Required for mandatory BNG	As above	PAS webpage; Examples available through PAS BNG network	PAS BNG in DM webpage
5.6	Integrate BNG into your internal consultation triage process, i.e. when planners consult ecologists and other specialists, and consider whether you want a process for allocating certain applications to a more expert DM planner and/or a regular meeting for DM officers and experts to discuss BNG issues		Required for mandatory BNG	As above	Buckinghamshire, Plymouth	
5.7	BNG condition templates, if deemed useful		Medium priority		Examples on PAS website	PAS BNG in DM webpage
5.8	BNG S106 templates, if deemed useful		Medium priority		Examples on PAS website	PAS BNG in DM webpage
5.9	Standard BNG wording for officer report		High priority to deliver mandatory BNG	As above		
5.10	Update any other relevant templates in casework system		Medium priority	As above		
6. Monitoring, enforcement and reporting						
6.1	Decide on an approach to monitoring - you will not be able to check every habitat management and monitoring plan report in detail, i.e. will you take a sampling approach, or just follow up when flagged by a third party? - and also what the consequences will be if targets are not met.		High priority to deliver mandatory BNG	Secondary legislation/guidance on habitat monitoring and reporting requirements - Defra; Threshold/definition for 'significant on-site BNG' - Defra; Enforcement guidance, including role of LPAs in relation to conservation covenants when they are not the responsible body - Defra/DLUHC; Guidance for conservation covenant responsible bodies - Defra		

6.2	Understand the additional costs and develop an approach for recovering costs of monitoring significant on-site and off-site BNG		High priority to deliver mandatory BNG	Secondary legislation/guidance on habitat monitoring and reporting requirements - Defra; Threshold/definition for 'significant on-site BNG' - Defra	Examples available through PAS BNG network	
6.3	Formalise the administration and documents for monitoring, including a tracking system		High priority to deliver mandatory BNG	Secondary legislation/guidance on habitat monitoring and reporting requirements - Defra; Threshold/definition for 'significant on-site BNG' - Defra		
6.4	Ensure you have staff to implement your monitoring approach		High priority to deliver mandatory BNG	Secondary legislation/guidance on habitat monitoring and reporting requirements - Defra; Habitat Management and Monitoring Plan template and good practice - NE		
6.5	Ensure that you have a member of staff that provides NERC duty reports on BNG to Government every five years, with the first report submitted within 12 weeks of 1 January 2026 - you will need to decide exactly what you are reporting on and make sure you collect this information		Medium priority	NERC biodiversity duty guidance - Defra		
6.6	Update planning enforcement plan (if you have one) or create a standalone BNG monitoring and enforcement statement, including how you will deal with off-site out-of-area and what your role is in enforcing when land is secured by conservation covenant (note that currently details on this for mandatory BNG are not known)		Lower priority	Enforcement guidance, including role of LPAs in relation to conservation covenants when they are not the responsible body - Defra/DLUHC; Guidance for conservation covenant responsible bodies - Defra		