



Biodiversity Report 2026

Covering the period 1 January 2024 to 1 January 2026

Contents

1. Introduction	2
2. Reigate & Banstead	4
Borough overview and key challenges	4
Council responsibilities	9
3. Policies, objectives and actions.....	12
Reigate & Banstead 2030 - Corporate Plan.....	12
Core Strategy 2014 (Reviewed in 2019 and 2024).....	13
Development Management Plan 2019 (Reviewed 2024).....	14
Local Character & Distinctiveness Design Guide SPD: Adopted June 2021	15
Climate Change and Sustainable Construction SPD: Adopted 16 September 2021	15
4. Other strategies.....	18
The draft Surrey Local Nature Recovery Strategy 2025	18
The Surrey Hills Management Plan 2025-2030	18
Reigate & Banstead Greenspaces Strategy 2025 to 2035	19
Environmental Sustainability Strategy 2024.....	22
5. Biodiversity Net Gain.....	24
Actions taken to meet BNG obligations	24
Approved and expected Biodiversity Net Gains.....	26
Future plans to meet BNG for the next reporting period	34
6. Successes and challenges.....	35
Partnership working	35
Development Contributions.....	36
Local Government Reorganisation	38
Long term delivery of BNG obligations	39
BNG exemption changes (2025).....	39
7. Future Actions	40
Appendix 1: Glossary of acronyms.....	44

1. Introduction

- 1.1. Since 1 January 2023, all public authorities have been under a statutory duty to conserve and enhance biodiversity. This biodiversity report documents the plans, policies and actions conducted to comply with the biodiversity duty. It communicates what has been actioned to improve the environment and the positive change this is having in the borough.
- 1.2. The first biodiversity report must cover a reporting period ending no later than 1 January 2026, and the report must be published within 12 weeks of the period's end. Therefore, the following monitoring period dates apply to this report.

Table 1: Monitoring period dates

Process	Date
Start date	1 January 2024
End date	1 January 2026
Publication date	No later than 26 March 2026

Source: [Gov.uk- Reporting your biodiversity duty actions guidance](#)

- 1.3. In terms of the legal context, the Environment Act 2021 introduced a strengthened 'biodiversity duty' requiring all public authorities in England to consider what they can do to conserve and enhance biodiversity. Further guidance, published in May 2023 and updated in September 2025, in summary confirmed that authorities must:
 - Consider what they can do to conserve and enhance biodiversity.
 - Agree policies and specific objectives based on their consideration.
 - Act to deliver the policies and achieve these objectives.
- 1.4. The first part of delivering the 'biodiversity duty' is to identify the work of Reigate and Banstead Borough Council (Reigate & Banstead) that contributes towards the

conservation and enhancement of biodiversity. This report highlights the principal areas of Reigate & Banstead's work that helps to deliver the 'biodiversity duty'.

- 1.5. As well as providing an overview of the existing biodiversity designations within the borough, section 2 explains the role and purpose of the authority, its governance and management structures as well as its responsibilities and duties. This section highlights how the authority operations affect the environment and biodiversity.
- 1.6. Section 3 and 4 set out the existing and emerging policies and objectives that are employed to meet the Council's biodiversity duty as well as the actions completed, either alone or in partnership with others, that benefit biodiversity.
- 1.7. Section 5 specifically looks at biodiversity net gain detailing the actions taken to meet Biodiversity Net Gain (BNG) obligations and reporting the number of biodiversity gains plans approved in the monitoring period and those expected to come forward. Section 6 highlights the Council's successes and challenges which lead on to the final section that documents future actions needed to secure greater biodiversity enhancements.

2. Reigate & Banstead

Borough overview and key challenges

- 2.1. Reigate & Banstead is a borough within the county of Surrey. Surrey operates under a two-tier system of local government, comprising the County Council, which oversees the whole county, and borough and district councils managing smaller sub-regions within it. Local government reorganisation will change structures and responsibilities over the coming years, but currently Reigate & Banstead is responsible for the maintenance of the borough's publicly owned green spaces including parks, play areas, cemeteries, woodlands, countryside areas and allotments. Surrey County Council is responsible for highway trees, grass cutting and public rights of way. The Borough Council works in partnership with County Council to fund and promote biodiversity projects, raise awareness and foster support from the community.
- 2.2. Reigate & Banstead borough covers approximately 12,910 hectares with 70% of land comprising countryside (approximately 9,037 hectares). The Council own approximately 3,000 acres (1,250 hectares) of this land ([Maintaining parks and countryside webpage](#)). The countryside is diverse, from the North Downs on the edge of outer London, to the Low Weald in the south, bordering West Sussex. The borough's 30% of urban land includes a network of smaller green spaces and links. Table 2 presents the borough's statutory landscape and biodiversity designations which are also shown in the borough map at figure 1.
- 2.3. In terms of statutory designations, the Surrey Hills National Landscape (formerly known as an Area of Outstanding Natural Beauty (AONB)), lies within the borough and is safeguarded for its natural beauty and ecological importance. It stretches across Surrey, meeting with the Kent Downs National Landscape to the east and the South Downs National Park to the south and west. Natural England is currently conducting a formal [boundary review](#), considering a potential extension of the Surrey Hills. A decision from the Secretary of State for the Environment is anticipated in summer 2026.
- 2.4. The Surrey Hills Area of Great Landscape Value (AGLV) is closely linked to the Surrey Hills National Landscape (NL) acting as an extension. It has been reviewed multiple times to ensure its continued protection and will help assist Natural England when reviewing the NL boundary review. Although landscape designations, both the Surrey Hills NL and AGLV play a vital role in biodiversity conservation due to their rich mosaic of habitats and ecological significance.
- 2.5. The Mole Gap to Reigate Escarpment Special Area of Conservation (SAC) is important internationally and requires the highest level of protection. Covering 892.3 hectares it is located to the west of the borough and crosses into neighbouring authority Mole Valley

District Council. It features 60% broad-leaved deciduous woodland, 25% dry grassland and 15% heath / scrub (JNCC). Located on the North Downs escarpment, it supports a variety of rare plants, particularly orchids, and protected species like Bechstein's bats and great crested newts (RBBC Habitats Regulations Assessments 2019).

- 2.6. Designated by Natural England under the Wildlife and Countryside Act 1981, Sites of Special Scientific Interest (SSSI) are the finest sites for wildlife and natural features in England, supporting rare and endangered species, habitats and natural features. The borough contains four SSSIs. There are no SSSI in the borough that are destroyed or partially destroyed and only 2.8% of the land at Mole Gap to Reigate Escarpment SSSI is in an unfavourable status and declining. No other SSSI is declining in condition (Environment and Sustainability Monitor, 2025). Factors contributing to the decline are the loss of traditional grazing leading to scrub encroachment, soil erosion affecting chalk grassland stability, climate change impacts altering species composition and human activity such as recreation or development pressures. (Natural England, Condition of Features).
- 2.7. Ancient woodland is defined in the National Planning Policy Framework glossary as an area that has been wooded continuously since at least 1600 AD. There are 246 areas of ancient woodland (comprising 597 ha) in the borough. These are small and disconnected with the largest area of ancient woodland at Perrotts Wood in Banstead Wood to the north of the borough. The
- 2.8. NL expansion proposals include the protection of ancient woodland from potential loss due to urban encroachment and infrastructure projects.
- 2.9. Sites of Nature Conservation Importance (SNCI) are areas of open space that contain a species or group of flora, fauna or habitat that is of local importance. Sites are selected for this designation and monitored by the Surrey Nature Partnership, which is made up of representatives from the County Council, Local Authorities and non-government organisations. There are 53 SNCIs within Reigate & Banstead covering a total of 1,352 ha.
- 2.10. Local Nature Reserves (LNRs) are declared and managed for nature conservation purposes under the National Parks and Access to the Countryside Act 1949. Local Authorities manage LNRs to maintain and enhance their special wildlife and geology. LNRs provide opportunities for research, education, or for residents and visitors to simply enjoy and have contact with nature. There are three local nature reserves in the borough which are all owned by the Borough Council.
- 2.11. Non statutory areas with biodiversity value include 218 urban open spaces comprising recreation grounds, school fields, amenity land, gardens of remembrance and

allotments. As shown in figure 1, a sizeable proportion of the borough is designated common land. Surrey County Council is the Commons Registration Authority, and Reigate & Banstead borough manage the nature conservation and enhancement of Earlswood and Redhill Commons, Park Downs and Reigate Heath.

- 2.12. Written by Surrey Wildlife Trust, Reigate Heath has a Management Plan 2019- 2029 and a Steering Group that monitors progress and implementation of the Plan and advises Reigate & Banstead about management of the Heath. The Earlswood Common Management Steering Group was set up to bring together many of the users of the Common so that issues and opportunities could be discussed and agreed upon. Banstead Commons Conservators manage Banstead Commons.
- 2.13. The borough contains 1,313 trees protected by Tree Preservation Orders (TPOs). Trees and woodland make a valuable contribution to the borough's landscape character and offer a range of important habitats. According to the Woodland's Trust 'State of the UK's Woods and Trees' report published in 2025, there is an ongoing decline in traditional woodland management practices, and this under-management of woodlands and copses is resulting in the loss of species diversity across the region.
- 2.14. Rivers (and their surrounding floodplains), waterways, ponds and lakes are important habitats and eco-corridors supporting a range of rare and protected species in Reigate & Banstead. The central and southern parts of the borough are shaped in part through rivers, waterways and water bodies. Areas including Reigate, Redhill and Merstham, and south towards Horley are criss-crossed by rivers and tributaries.
- 2.15. Biodiversity Opportunity Areas (BOAs) identify the most important areas for wildlife conservation in Surrey where targeted conservation action will have the greatest benefit. The main aim within BOAs is to recover declining biodiversity at a landscape scale through the maintenance, restoration and creation of priority habitats. There are BOAs in the borough either alone or shared with neighbouring Mole Valley or Tandridge District Councils. These BOAs will be considered when producing the Local Nature Recovery Strategy for Surrey with is discussed at section 4 of the report.
- 2.16. Despite it not being a landscape or biodiversity designation, the Green Belt features in table 2. It is a policy designation aimed at preventing urban sprawl, preserving openness, and protecting countryside around towns and cities. It is not explicitly designed to protect nature, but the fact that 69% of the borough lies within this (predominately) undeveloped land is important. The high housing numbers required by government, shortage of brownfield land and pressure to develop could impact the biodiversity, ecology, and natural environment of this land.

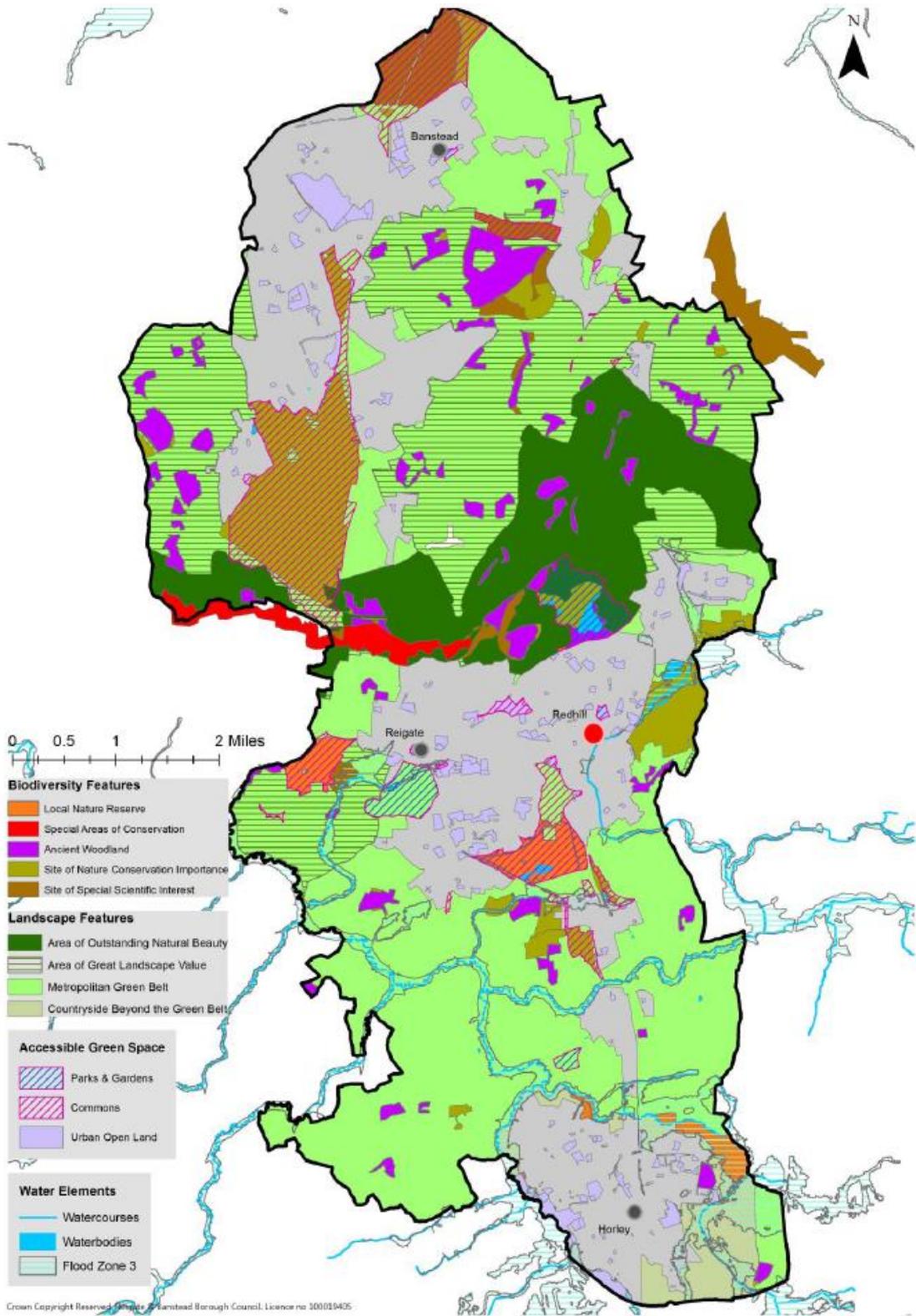
2.17. Gatwick Airport lies directly south of the borough, and has a major influence on local infrastructure, environment, and economy. In 2023, Gatwick Airport Limited submitted a planning application (Development Consent Order (DCO)) for the amendment of Gatwick Airport to support dual runway operations through the routine use of the existing northern runway to accommodate up to 80 million passengers per annum. The development will include amendments to taxiways, terminals and ancillary facilities, highways and rivers; as well as temporary construction works, mitigation works and other associated development. Following the decision of the Secretary of State for Transport to approve the DCO on 21 September 2025, there will be several environmental implications for Reigate & Banstead to monitor and consider.

Table 2: Statutory policy, landscape, and biodiversity designations in the borough

Designation	Type of designation	Area (ha)	% of borough
Green Belt	National, Policy	8,888 ha	69%
Surrey Hills National Landscape	National, Landscape	1,549	12%
Area of Great Landscape Value	Local, Landscape	4,740	37%
Mole Gap to Reigate Escarpment Special Area of Conservation	International, Biodiversity	450	3%
Sites of Special Scientific Interest	National, Biodiversity	796	6%
Ancient Woodland	National, Biodiversity	597	4.6%
Sites of Nature Conservation Importance	Local, Biodiversity	1,172	9.1%
Local Nature Reserves (LNR)	Local, Biodiversity	292	2.2%

Source: Environmental Sustainability Strategy, 2024 and RBBC Analysis, 2025

Figure 1: Borough map with biodiversity features.



Source: Green Infrastructure Strategy, August 2017

Council responsibilities

- 2.18. The Council own much of the Banstead Commons, and the Banstead Commons Conservators are the statutory body responsible for their management. At 1,350 acres (510 hectares), Banstead Commons are made up of four sites: Banstead Downs, Park Downs, Burgh Heath and Banstead Heath. Banstead Downs and Park Downs are designated as Sites of Special Scientific Interest and Banstead Heath is designated as a Site of Nature Conservation Interest.
- 2.19. The Council also owns parts of three Sites of Special Scientific Interest: Reigate Heath, Banstead Wood and Chipstead Downs, and Earlswood Common and two Local Nature Reserves: Reigate Heath and Earlswood Common. It has a statutory duty to manage these sites in accordance with guidelines laid down by Natural England, the government body responsible for nature conservation in this country.
- 2.20. The Greenspaces team is responsible for the day-to-day management and maintenance of the borough's parks, play areas, sports pitches and allotments. This includes the planting and maintaining of shrubs and bedding displays in the town centres, cemeteries and churchyards across the borough. The team manages approximately 1,650 acres (700 hectares) of countryside, including parts of three Sites of Special Scientific Interest and Nature Conservation Interest ([RBBC Maintaining parks and countryside webpage](#)).
- 2.21. The Greenspaces team is also responsible for the management of 558.5 hectares (1,380 acres) of Council-owned woodland and the trees in the borough's 55 parks and open spaces ([RBBC Trees and woodlands webpage](#)).
- 2.22. As the Surrey Hills National Landscape (NL) lies within the borough, the Council have a statutory duty under the CROW Act 2000 to prepare and adopt a Management Plan and review this at intervals of no less than 5 years. The Surrey Hills Board prepares the Management Plan on behalf of the constituent local authorities; however, responsibility for the Plan rests with the local authorities and each one is required to separately adopt it. The policies within the Management Plan are a material consideration in the determination of planning applications (insofar as they are relevant) and complement policies in the Council's own Core Strategy and Development Management Plan.
- 2.23. Preparation of the [revised Management Plan 2025-30](#) was supported by members of the Surrey Hills Officer Working Group (including input from officers of this Council), members of the Surrey Hills Partnership and individuals from a wide range of conservation, land management, tourism and other organisations. The Council, and other constituent authorities, also contribute to the overall costs of the Surrey Hills NL unit each year.

- 2.24. The planning department has several responsibilities in terms of ensuring new development helps conserve and enhance biodiversity. The planning policy team embed biodiversity considerations into local plan preparation and develop policies that actively support biodiversity goals. They work in partnership with Natural England, local wildlife trusts and other relevant stakeholders to ensure biodiversity protections are robust and evidence based. Officers will align local plan preparation work with the Surrey Local Nature Recovery Strategy once published.
- 2.25. Development management officers provide guidance to developers on how to meet biodiversity objectives early in the planning process through pre-application advice. Their role is to implement national and local plan policies and ensure all planning decisions conserve and enhance biodiversity.
- 2.26. The planning department enforce the legal requirement that new developments must deliver a minimum 10% net gain in biodiversity, measured using a standardised metric. A dedicated webpage includes [frequently asked questions and key considerations](#) and covers detailed information on a number of issues including BNG levels, development types, exemptions and the biodiversity metric.
- 2.27. The planning department also administer the Community Infrastructure Levy (CIL) which is a charge that local authorities can set on new development to raise funds for infrastructure, facilities, and services. The Council reports annually on the amount of CIL received, allocated and spent. Section 6 of this report highlights the biodiversity projects that have been funded and completed because of this support.
- 2.28. The [Place and Regeneration team](#) delivers projects across four key areas of the borough: Horley, Merstham, Preston and Redhill. While much of the team's work focuses on new homes, town centre revitalisation, community facilities and infrastructure improvements, several initiatives have specifically enhanced local biodiversity. These include the Riverside Green Chain, which protects and improves the riverine environment in Horley; new tree planting, landscaping and swales to support drainage and habitat creation at Merstham Recreation Ground; and the development of a sensory garden and orchard in Redhill's Memorial Park.
- 2.29. The Sustainability team collaborate with all departments to make the Council 'greener' and work in partnership to deliver projects to improve the environment of the borough. The action plan accompanying the [Environmental Sustainability Strategy](#) guides the team's activities and includes a specific section on the natural environment including biodiversity.
- 2.30. Environmental sustainability is inherent in the management and protection of greenspaces. This includes the conservation and enhancement of the natural

environment, including creating resilient and connected nature-rich habitats for the benefit of people and wildlife. Urban and natural greenspaces also play a vital role in our ability to adapt to changes in climate through natural carbon sequestration; mitigating extreme weather events such as flooding; providing shading and cooling; and opportunities for local carbon offsetting. Access to and connections between greenspaces also have benefits for promoting walking and cycling which have associated environmental benefits in reducing car travel and improving air quality.

2.31. The Sustainability team promotes environmental sustainability and has a dedicated [green spaces webpage](#) that gives residents useful advice and ideas on how to protect the environment and support biodiversity in their gardens. Additional information on environmental sustainability work is available on the [environmental sustainability](#) pages of the Council's website.

3. Policies, objectives and actions

Reigate & Banstead 2030 - Corporate Plan

- 3.1. The Council's Corporate Plan is its five-year plan, setting out its overall vision, priorities and strategic approach to delivering services and serving the borough. It informs how the Council allocates its funding and the day-to-day work of different service areas. More detailed information is explained through the Council's annual budget setting process, annually prepared service plans and in some cases more detailed topic-specific strategies and action plans. The Council's website contains more information on supporting strategies and the budget setting process.
- 3.2. Environmental sustainability is a core commitment for the Council. As part of delivering the Corporate Plan's vision to be more environmentally sustainable, the Council will work towards preserving local natural environments and enhancing biodiversity. To ensure that this is achieved, the Corporate Plan 2030 includes the following objective: 1.2.3 (Greenspaces that deliver health, recreation, and nature benefits), which specifically aims to enhance biodiversity.

Objective 1.2.3: Green spaces that deliver health, recreation, and nature benefits.

Green and natural spaces provide significant benefits for resident health and wellbeing while also supporting nature, absorbing carbon and helping mitigate the impact of a changing climate. Offering a range of different types of greenspaces, supporting different activities and habitats, can maximise these benefits (for example parks, countryside, gardens, commons, allotments, sports pitches, playgrounds and skate parks).

To deliver this objective, we will:

- Maintain and improve our parks, allotments, and sports and recreation facilities to meet resident needs, with more detail to be included in a new greenspace's strategy.
 - Preserve our commons, countryside and other natural spaces, working with local partners to protect local open space and nature benefits, and enhance biodiversity.
 - Keep our green spaces safe, clean and tidy and address and prevent, litter, mess, pollution and anti-social behaviours.
 - Provide memorial and reflection spaces and manage our local cemeteries.
- 3.3. To ensure that there is progress on delivering the objective, the Council publishes an annual report. For objective 1.2.3, the relevant success measure is set out in Annex 1: Success Measures and Contextual Data. This annex specifies that information on

activities supporting nature across the borough's greenspaces will be provided to demonstrate the objective's achievement.

Reigate & Banstead Local Plan

- 3.4. The Reigate & Banstead current Development Plan consists of the Core Strategy (adopted in 2014 and reviewed in 2019 and 2024) and the Development Management Plan (DMP) (adopted in 2019 and reviewed in 2024). These development plan documents set out the strategy and policies for the use, development and protections of land and buildings in the borough. Decisions on planning applications are guided by the policies contained within the statutory development plan.
- 3.5. Both development plan documents, the Core Strategy and DMP, contain objectives and policies that aim to protect and enhance biodiversity in the borough. As well as these plan objectives and policies, adopted supplementary planning documents (SPDs) also provide additional guidance on how the policies or proposals will be implemented. The following sets out the where in the development plan and guidance biodiversity features.

Core Strategy 2014 (Reviewed in 2019 and 2024)

- **Core Strategy Objective SO8:**
 - To safeguard and promote biodiversity and wildlife corridors at a local level, as well as on designated sites, through responsible and positive design and management.
- **Core Strategy Policy CS2: Valued landscapes and the natural environment.**
 - In considering the allocation of land and /or proposals for significant development, the Council and developers will be required to protect and enhance the borough's green fabric. Bullet point 1 c) states that 'The borough's commons will be maintained and enhanced for the benefits of farming, public access and biodiversity' and that at point e) 'Sites of Special Scientific Interest (SSSIs), Sites of Nature Conservation Importance (SNCIs), Local Nature Reserves (LNRs) and ancient woodland will be protected for their biodiversity value and where appropriate enhanced'.
- **Core Strategy Policy CS4: Valued townscapes and the historic environment.**
 - Bullet point 2 d) states that development will 'Protect and where appropriate enhance existing areas of biodiversity value and the links between them'.

Development Management Plan 2019 (Reviewed 2024)

- **DMP Objective SC10:**
 - Ensure new development protects, and enhances wherever possible, the borough's landscapes and biodiversity interest features, providing the highest degree of protection to internationally and nationally designated areas.
- **DMP Objective SC11:**
 - Maximise the contribution of new development to a comprehensive green infrastructure network across the borough.
- **DMP Policy NHE1: Landscape protection**
 - This policy recognises the need to afford the AONB (now National Landscape) with the highest level of protection in accordance with national policy and the importance of the Area of Great Landscape Value (AGLV), particularly considering the impending review of the Surrey Hills AONB (now National Landscape).
- **DMP Policy NHE2: Protecting and enhancing biodiversity and areas of geological importance.**
 - This policy protects these most valued sites in line with national policy.
- **DMP Policy NHE3: Protecting trees, woodland areas and natural habitats.**
 - This policy safeguards valuable tree cover, and ensures that, through good design and best practice, these features are protected and enhanced as an integral part of new development.
- **DMP Policy NHE4: Green and blue Infrastructure**
 - Policy NHE4 reflects the importance of both protecting green and blue infrastructure and capturing opportunities arising from new development to extend and enhance the network.
- **DMP Policy OSR1: Urban Open Space**
 - This policy safeguards the most important Urban Open Spaces and ensures they continue to benefit current and future residents. It also allows for exceptional circumstances to be demonstrated where certain specific criteria can be satisfied.

- **DMP Policy OSR3: Outdoor sport and recreation**
 - Policy OSR3 will ensure that outdoor sport and recreation provision is appropriately located and sensitively designed. Criterion 4 specifically states that proposals should not have an adverse effect on the features of nature conservation, geology and biodiversity value or landscape value character of the site.
- **DMP Policy CEM1: Cemetery and crematorium provision**
 - This policy supports applications for cemeteries and crematoriums where proposals would not have an unacceptable adverse impact on biodiversity, or geological assets.

Local Character & Distinctiveness Design Guide SPD: Adopted June 2021

3.6. The Local Character & Distinctiveness Design Guide aims to ensure new development reflects and enhances the borough's unique character. In terms of its environmental considerations, the SPD encourages the use of native trees and shrubs and supports the preservation of green corridors, parkways and soft edges to maintain ecological value.

Climate Change and Sustainable Construction SPD: Adopted 16 September 2021

- 3.7. The aim of the Climate Change and Sustainable Construction SPD is to support development, including residential and business, to be accountable to the challenges of mitigating and adapting to climate change, and to address other sustainability issues, some of which overlap and provide additional gains such as biodiversity enhancements. It provides guidance and advice and includes a chapter dedicated to green infrastructure and ecology (chapter 7).
- 3.8. Appendix 5 in the SPD includes a sustainability checklist which allows applicants to check whether their proposed schemes have considered key sustainability factors. Section 4 relates to green infrastructure and ecology and includes a list of questions which are either directly related to improving biodiversity or additional green infrastructure which would have significant ecological benefits. These are set out in table 3

Table 3: Sustainability checklist for section 4 - Green Infrastructure and Ecology

4. Green Infrastructure & Ecology
For large developments does the proposed scheme incorporated green infrastructure for increased resilience and adaptation to potential changes in climate? (This will need to be set out as part of the planning application).
For denser urban developments, has greenery been included in some form - for cooling surrounds and buildings?
Has the planting of shrubs been considered for cooling the outside of buildings?
For developments on or close to roads, have trees or planting been considered for carbon capture and/or sequestration of air pollution (particles, etc)? And for larger developments, are trees/planting included for this purpose?
Have evergreen trees been considered in designs, to allow for carbon capture (and capture of air pollution) in the autumn/winter months?
Does the scheme incorporate any green infrastructure measures for insulation of buildings?
Does the scheme incorporate green roofs/walls?
Does the scheme incorporate any green infrastructure measures to assist with water attenuation?
Have measures to conserve, enhance and/or restore biodiversity (including to assist pollinators) in and around the development been considered, including to compensate for habitats lost through development of brownfield land, or through changes to the climate? (This could include a utilisation of a 'matrix' approach to habitats for adaptation to climate change.)

4. Green Infrastructure & Ecology

If the site is within an identified Biodiversity Opportunity Area (BOA) – have green infrastructure measures been included in line with the needs for that area, including regarding climate change?

In denser developments, have green roofs/walls been included to allow for linkages between habitats for birds and invertebrates, for example through measures such as living pillars?

For larger developments, where there are flood-risks and /or rainwater attenuation issues, have Sustainable Drainage Systems (SuDS) been considered – which can also assist in the enhancement/maintenance of wildlife habitats and eco-systems?

Have all mature or large trees on the site been incorporated into the design of the new proposal, wherever possible?

Where there is landscaping in schemes have native tree/planting species been considered for inclusion, and are they suitable for a changing climate?

Have you considered how green and blue spaces within the development will be connected to the wider green infrastructure assets of the borough?

Does the planting of new green infrastructure take account of the change in climate regarding selection of suitable types?

Will you be protecting existing ecological features from damage during site preparation and completion of construction works where practicable?

Does the proposal provide for on-going management of green and blue spaces, including biodiversity habitats?

Source: Appendix 5: Climate change and Sustainable Construction SPD, 2021.

4. Other strategies

The draft Surrey Local Nature Recovery Strategy 2025

- 4.1. The draft Surrey Local Nature Recovery Strategy (LNRS) is a plan for the restoration, recovery and enhancement of nature across the county. Required by law under the Environment Act 2021, every county in England must produce a Local Nature Recovery Strategy. These strategies will work together to restore, create and connect habitats across England. All the strategies share the same aim of halting and reversing the decline of nature but have bespoke measures unique to the landscapes of each area.
- 4.2. Surrey County Council is the responsible authority assigned by DEFRA to create the LNRS for Surrey. The sites identified within the LNRS will inform future plans (e.g. Local, Minerals and Waste, and Neighbourhood plans), and guide future development, by identifying natural spaces that have potential to be connected and restored.
- 4.3. In summary, the Local Nature Recovery Strategy will:
 - Agree priorities for nature's recovery.
 - Map the most valuable existing areas for nature.
 - Map specific proposals for creating and improving habitat for nature and wider environmental goals.
- 4.4. Decisions about where and how to recover nature have been reached through workshops and formal consultation with a wide range of people and groups, from ecologists and community groups to health professionals and local businesses. Reigate & Banstead have been working closely with the County to develop the strategy. The final consultation on the draft LNRS took place in September 2025.
- 4.5. Once published the LNRS will help the Council to direct new funding streams and action plans that can maximum benefits to nature. The map will help identify sites for green and blue space delivery, determine locations for off-site BNG and assist with planning decisions. Reigate & Banstead will use this strategy to ensure habitat for wildlife in the borough is in a better state than it was before development.

The Surrey Hills Management Plan 2025-2030

- 4.6. The Surrey Hills Management Plan is a strategic document which provides the vision, policies and plans for the future management of the National Landscape (NL). The purpose of the Management Plan is to provide a context for the various initiatives that support the conservation and enhancement of this nationally important landscape.

4.7. Part 4 of the plan includes a chapter on biodiversity and water resources with the following policy aim:

We will enhance the biodiversity of the Surrey Hills by creating and restoring wildlife rich habitats, trees outside woodlands, hedgerows and ensure more protected sites are in favourable condition.

B1: Designated sites (SSSIs, SPAs & SACs) within and connecting to the National Landscape will be conserved, enhanced & managed to ensure that all such sites are brought into or maintained in 'favourable' condition.

B2: The importance of designated sites and the need for their protection and management will be promoted to the public through information and awareness campaigns.

B3: Important habitats, such as chalk grassland and heathland, will be managed and promoted in ways that conserve and enhance their nature conservation and cultural value.

B4: Opportunities will be taken to restore, extend and link habitats for nature recovery through the creation of new habitats and corridors to establish a multifunctional landscape which helps to mitigate and adapt to climate change.

B5: The enhancement of biodiversity will be maximised through the targeting of advice and grants for nature friendly farming that supports the delivery of the Local Nature Recovery Strategy.

B6: Opportunities to deliver biodiversity net gain and offsetting in the National Landscape to meet planning conditions or legal agreements will be promoted, when appropriate.

B7: Water Catchment Management Plans and the Local Nature Recovery Strategy will conserve and enhance the ecological value of river corridors, wetland habitats and water quality to protect biodiversity and enhance the environmental and landscape quality of the Surrey Hills.

Reigate & Banstead Greenspaces Strategy 2025 to 2035

4.8. The Greenspaces Strategy 2025 to 2035, adopted by the Council's Executive on 23 October 2025, recognises the pivotal role that parks, and open spaces play in the quality of life for residents, improving environmental sustainability and supporting the borough's corporate objectives set out in the Corporate Plan 2030. The strategy establishes the principles and objectives guiding activities related to Greenspaces

services and serves as a comprehensive framework to inform and direct the ongoing work of the Greenspaces Team.

4.9. To achieve the vision and relating to the theme of nature and biodiversity the strategy presents the following priorities and actions:

Table 4: Priorities and Actions for Nature and Biodiversity

Priorities	Actions
<p>2.1 Strengthen measures to protect and enhance local biodiversity, develop the size of wildlife populations, and contribute to the broader ecological network.</p>	<p>2.1.1 Work with stakeholders to access, promote and encourage opportunities to enhance biodiversity and nature, including joining up areas by using corridors, linkages and biodiversity opportunity areas and work to limit the presence of invasive plant species</p> <p>2.1.2 Ensure individual management plans reflecting the need to conserve and enhance areas of high ecological value are available for designated sites.</p> <p>2.1.3 Explore options for, and where appropriate deliver, alternative grass cutting schemes/wilding, promotion of pollinators, planting of climate resilient species as well as nectar producing plants and other wildlife measures such as bat boxes, bug hotels and swift boxes.</p> <p>2.1.4 Incorporate sustainable practices in maintenance regimes such as the avoidance of using peat; how we use pesticides, minimise the environmental impact whilst maintaining waterways and hedgerows, and the electrification of tools and vehicles in line with net zero targets</p> <p>2.1.5 Actively avoid causing a negative impact on the wider environment (i.e. pollution and habitat loss resulting from activities) and introduce areas for wildlife sanctuary.</p> <p>2.1.6 Establish a biodiversity baseline and targets (alongside key partners) to inform benchmarking and ensure we maximise biodiversity benefits.</p> <p>2.1.7 Pilot trial areas for rewilding projects before committing to costly, larger improvements that may have a detrimental impact on existing areas.</p>

Priorities	Actions
<p>2.2 Enhance adaptation and resilience of our greenspaces to the impacts of a changing climate.</p>	<p>2.2.1 Regularly review operations in light of climate change risks and impacts.</p> <p>2.2.2 Support our Environmental Sustainability Strategy by implementing the actions towards the stated net-zero objectives, summarised as:</p> <ul style="list-style-type: none"> • Supporting nature-based carbon offsetting measures on our land. • Reviewing measures to incorporate opportunities for tree planting, water retention, climate resilient species, shading.
<p>2.3 Implement and support delivery of key objectives within existing and emerging strategies and incorporate policies to inform best practice.</p>	<p>2.3.1 Work with partners to help address and deliver the relevant duties of the Council, currently including Green Infrastructure Strategy, Biodiversity Net Gain, Natural Environment and Rural Communities Act, and Surrey Local Nature Recovery Strategy.</p> <p>2.3.2 Support the delivery of ‘Surrey Adapt: The Surrey Climate Change Adaptation and Resilience Strategy’.</p>
<p>2.4 Increase the use of educational tools to inform and engage.</p>	<p>2.4.1 Identify opportunities to provide further educational material and insight.</p> <p>2.4.2 Support the Council’s school holiday programme activities.</p> <p>2.4.3 Explore options for educational biodiversity projects and initiatives to include schools, churches, community & voluntary groups.</p>
<p>2.5 Effectively and safely manage the tree stock.</p>	<p>2.5.1 Develop a Tree Strategy.</p> <p>2.5.2 Review tree stock to ensure we understand existing provision and identify planting opportunities.</p> <p>2.5.3 Finalise and maintain an ash die back management plan.</p>

Priorities	Actions
	2.5.4 Set a target for planting additional trees. This should support carbon capture and enhance local biodiversity (whilst being mindful of ‘right tree, right place’ principles).

Source: Greenspaces Strategy, 2025 to 2035.

4.10. The strategy will be reviewed annually to ensure that the priorities are still relevant, and the actions are being achieved.

Environmental Sustainability Strategy 2024

4.11. The Environmental Sustainability Strategy 2024 updates the previously commissioned 2020 strategy and is a response to the former Corporate Plan 2025’s vision which included ‘being proactive about tackling climate change and reducing our environmental impact’ (Reigate and Banstead 2025). To deliver this commitment, the Council undertook the Environmental Sustainability Strategy, which provides the actions needed to meet the Council’s vision, objectives and targets.

4.12. Under the natural environment and biodiversity section, the strategy includes the following three key priorities:

- **Ecological enhancement:** Improvement of the tree and soft landscaping cover to create and maintain habitats that are of benefit to wildlife.
- **Sustainable drainage systems:** Use of sustainable drainage systems (SuDS) to reduce flooding and the embodied carbon of drainage infrastructure whilst providing biodiversity and amenity benefits.
- **Environmental impact and pollution prevention:** Avoid negative impacts to the wider environment i.e. pollution and habitat loss resulting from Council’s activities (including procurement) and from activities in the wider borough (e.g. transport impacting on air quality).

4.13. Progress is reported in the Environmental Sustainability Annual report. Headline achievements for the 2024/25 reporting period are as follows:

- The draft Greenspaces Strategy has been consulted upon, and feedback has been actioned. Actions from the Strategy’s Action Plan will help to deliver the Environmental Sustainability Strategy’s natural environment objectives.

- Planting 2,500 trees, in collaboration with Surrey County Council and volunteers, on Council land along with 56 standard trees. Over 100 trees were planted at Merstham Recreation Ground, with 9 urban trees in Horley Central Car Park. Residents will be partnered with newly planted standard trees so they can support supplementary watering to give the trees the best chance of establishing.
 - Over 3,500 m² of wetland planting and meadow was carried out in Merstham Recreation Ground, along with spring bulbs planted by school volunteers, and a green roof on the pavilion. As well as additional trees, Horley Central Car Park landscape improvements included shrub and herbaceous planting which assists in promoting biodiversity.
 - No peat was used during the year, and less than 10 litres of glyphosate was used.
 - Community Partnerships funded a food waste community composting project at Gateway Community Garden in Reigate with UKSPF funding. This will recruit volunteers from socially isolated community members, provide education about the benefits of reducing food waste and produce compost for the garden, highlighting the social and other co-benefits of this and many other environmental interventions.
 - The three-year rolling average indicates a continuing improvement in air quality (as measured by nitrogen dioxide). This is likely to be due to a reduction in pre-2016 diesel vehicles and a growing number of electric vehicles.
- 4.14. Alongside this, the Sustainability Team continues to support managers and officers across the Council to understand environmental issues and identify opportunities to make a difference and ensure sustainable ways of working become embedded within the Council.
- 4.15. The Environmental Sustainability Strategy will be kept under review to ensure that the Council's activities continue to take account of national policies, commitments and technological changes.

5. Biodiversity Net Gain

- 5.1. Biodiversity Net Gain (BNG) is a planning approach that ensures development leaves the natural environment in a measurably better state than it was before which means creating more habitats for wildlife and improving the quality of existing ones.
- 5.2. Introduced under the Environment Act 2021, developers must assess the biodiversity value of a site before the commencement of development and then deliver at least a 10% increase in that value through habitat creation or enhancement. This gain can be achieved:
 - On-site, by integrating green infrastructure or restoring habitats.
 - Off-site, by enhancing biodiversity elsewhere and registering those improvements.
 - Or, as a last resort, by purchasing statutory biodiversity credits from the government.
- 5.3. BNG became mandatory in England in February 2024 for major developments, with small sites following shortly after in April 2024. The gains must be secured for at least 30 years, and developers are required to submit a Biodiversity Gain Plan for approval before starting work. It is part of a broader strategy to embed nature recovery.

Actions taken to meet BNG obligations

- 5.4. To help meet the mandatory BNG requirements, Reigate & Banstead offer pre-application advice for applicants and have an updated validation checklist, which includes a specific biodiversity checklist. A [FAQs webpage](#) sets out key information needed when applying for planning permission and clearly explains what an applicant must do if they believe the development would be subject to the BNG condition. Surrey County Council also offers bespoke pre-application advice for applicants and have a similar [BNG webpage](#).
- 5.5. The [FAQs webpage](#) sets out which sites are eligible for BNG and explains that it is mandatory for all major applications received on or after 12 February 2024 and small site applications submitted on and after 2 April 2024.
- 5.6. There are however developments that are exempt from the BNG requirement. In accordance with [the Biodiversity Gain Requirements \(Exemptions\) Regulations 2024](#), householder applications are exempt from the BNG planning condition. Exemptions also include development impacting habitat of an area below a 'de minimis' threshold of 25 square metres, or 5 metres for linear habitats such as hedgerows and watercourses (excluding [priority habitat](#), listed under [Section 41 of the Natural Environment and Rural Communities Act 2006](#)), biodiversity gain sites and small scale self-build and custom

housebuilding. Applicants must provide a statement to explain why the development is exempt. This is checked by the County's Ecologist and considered by officers during the planning application consultation period.

5.7. When an applicant believes the development would be subject to the BNG condition, the application must be accompanied by the following information:

Biodiversity Gain Information Required

- Confirmation that the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition.
- The pre-development biodiversity value(s), either on the date of application or an earlier proposed date (as appropriate) ([GovUK](#)).
- Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.
- The completed metric calculation tool ([GovUK](#)) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date), including the publication date of the biodiversity metric used to calculate that value.
- A statement whether activities have been carried out, prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation' – [GovUK](#)), and where they have:
 - o A statement to the effect that these activities have been carried out.
 - o The date immediately before these activities were carried out.
 - o The pre-development biodiversity value of the on-site habitat on this date.
 - o The completed metric calculation tool showing the calculations.
 - o Any available supporting evidence of this.
- A description of any irreplaceable habitat ([GovUK](#)) (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 – [legislation.gov.uk](#)) on the land to which the application relates, that exists on the date of application (or an earlier date).

Biodiversity Gain Information Required

- Plan(s), drawn to an identified scale and showing the direction of North, showing on-site habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Source: ([RBBC: Biodiversity net gain FAQs and key considerations](#))

- 5.8. If this information has not been provided, the Council is likely to refuse to validate the application.
- 5.9. A draft Biodiversity Gain Plan ([GovUK](#)) is encouraged to be submitted at the validation stage to provide information on the strategy on how BNG is to be delivered and secured. If satisfied that at least 10% biodiversity net gain is capable of being achieved, the general biodiversity gain condition will be attached to the planning permission. This will require the submission, and subsequent implementation, of a full Biodiversity Gain Plan.
- 5.10. A finalised Biodiversity Gain Plan ([GovUK](#)), using Defra's template or equivalent set of information, must be submitted and approved, prior to the commencement of development. This must then be implemented in accordance with the General Biodiversity Condition. This will include the maintenance and monitoring of the habitats plan. Significant on-site and off-site BNG must be legally secured for a minimum of 30 years, typically through planning conditions, S106 agreements and conservation covenants.
- 5.11. Applicants are responsible for monitoring BNG progress and submitting reports to the Council at agreed intervals across the management and monitoring period.

Approved and expected Biodiversity Net Gains

- 5.12. Excluding householder applications, Reigate & Banstead approved 216 planning permissions that could require BNG in the reporting period. 184 of these were subject to an exemption as they were below the 'de minimis' threshold or small-scale self-build and custom house builds. This reflects the character of the borough with small scale developments being the predominant development type. It is important to note that developments exempt from mandatory net gain still require opportunities for biodiversity enhancements in accordance with local and national policies.
- 5.13. Table 5 shows that a total of 32 planning applications with biodiversity gain conditions have been approved in the reporting period. 31 were small scale development sites and

only 1 was a major development site. 16 planning approvals have achieved BNG on site, 14 off-site and 2 achieved a combination of on-site and off-site units. Table 6 summarises the 8 applications where the BNG condition has been formally discharged, while Table 7 identifies 24 applications expected to be discharged, including those registered but not yet determined.

- 5.14. None of these approved development sites has irreplaceable habitats (corresponding to the descriptions in the Schedule in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2023)) on land to which the application relates.
- 5.15. Currently, there is no BNG site (also known as a habitat bank) in Reigate & Banstead borough to offset any losses from development. Work is continuing to identify a BNG off-setting site/ bank within the borough and six sites have been assessed to date. Four of these were discounted because insufficient offsetting could be achieved, and the two remaining sites were considered too small to justify the start-up and monitoring fees.
- 5.16. In the absence of a BNG site/ habitat bank within the borough, the Council encourages off-site BNG be located as close as possible to the development site to benefit local biodiversity and communities. Tables 6 and 7 indicate where off-site units have been purchased with most of these located in counties in the south-east of England but there is one located in North Yorkshire.
- 5.17. As a last resort, applicants can purchase credits from the statutory biodiversity credit scheme (GovUK), which go towards habitat creation plans across the UK. However, this must be approved prior to purchase, and applicants need to justify how they have rigorously followed the BNG principles and rules. No approvals have included BNG credits in this reporting period.
- 5.18. As stated in paragraph 5.7, applicants are required to submit a completed Biodiversity Metric Calculation Tool. This tool assesses the biodiversity value of a site and quantifies losses and gains by comparing pre-development and post-development habitat values. Tables 6 and 7 provide a summary of the headline findings in these assessments, presenting the pre-development and post-development biodiversity units for each habitat type ('habitat', 'hedgerow', or 'watercourse') and the percentage increase secured either on-site or off-site.
- 5.19. The results show that on-site applications generate the highest biodiversity gains often exceeding the 10% requirement. This aligns with the BNG hierarchy, which prioritises on-site habitat improvements as the most effective means of creating and enhancing biodiversity. The average on-site habitat gain achieved across the discharged application sites is 25.87% which demonstrates that a higher local target could be achieved and would further support biodiversity in the borough.

Table 5: Eligible planning permissions granted under the Town and Country Planning Act 1990 requiring biodiversity net gain

Consented applications requiring net gains	Number
Total number of planning permissions approved that require BNG in the reporting period	216
Total number of planning permissions approved in the reporting period where an exemption to BNG applies	184
Total number of planning applications with biodiversity gain conditions approved in the reporting period.	32
Total number of planning applications with biodiversity gain conditions discharged in the reporting period	8
Total number of planning applications with biodiversity gain conditions approved in the reporting period securing BNG through on-site units only	16
Total number of planning applications with biodiversity gain conditions approved in the reporting period securing BNG through off-site units only	14
Total number of planning applications with biodiversity gain conditions approved in the reporting period securing BNG through statutory credits only	0
Total number of planning applications with biodiversity gain conditions approved in the reporting period securing BNG through a combination of on-site and off-site units	2
Total number of planning applications with biodiversity gain conditions approved in the reporting period securing BNG through a combination of on-site units and statutory credits	0

Consented applications requiring net gains	Number
Total number of planning applications with biodiversity gain conditions approved in the reporting period securing BNG through a combination of off-site units and statutory credits	0
Total number of planning applications with biodiversity gain conditions approved in the reporting period securing BNG through a combination of on-site, off-site units and statutory credits	0

Table 6: Approved planning applications with BNG conditions discharged.

App Ref	On or off-site	Pre development Units	Post Development Units	Difference + or - Units	Secured % increase
24/01245/F DET7	On-site	0.44 habitat 0.26 watercourse	0.55 habitat 0.35 watercourse	+ 0.11 habitat +0.9 watercourse	25.84% habitat 31.20% watercourse
24/01488/F DET10	On-site	2.89 habitat	3.22 habitat	+0.32 habitat	11.24% habitat
24/02004/F DET22 DET15	On-site	0.56 habitat 0.04 hedgerow	0.62 habitat 0.17 hedgerow	+ 0.06 habitat + 0.13 hedgerow	11.69% habitat 373.41% hedgerow
24/02320/F DET07	On-site	0.40 habitat	0.67 habitat	+0.27	66.07%

App Ref	On or off-site	Pre development Units	Post Development Units	Difference + or - Units	Secured % increase
25/00528/F DET09	On-site	0.37 habitat	0.43 habitat	+0.06 habitat	14.52% habitat
24/01875/F DET10	Off-site	0.29 habitat 0.17 hedgerow	0.29 habitat 0.07 hedgerows	-0.00 habitat -0.10 hedgerow	10% habitat (0.03 units) 10% hedgerow (0.12 units) purchased from Wild Tees, Nunthorpe
25/00003/F DET04	Off-site	0.14 habitat	0.04 habitat	-0.10 habitat	10% habitat (0.12 units purchased from Wendling Beck, Norfolk
25/00387/F DET14	Off-site	2.70 habitat	2.14 habitat	-0.56 habitat	10% habitat 0.83 units purchased from Chalksole Farm, Kent

Table 7: Approved planning applications with a BNG condition expected to be discharged.

App ref	On or off-site	Pre development units	Post development units	Difference + or - units	Proposed % increase
24/01453/F DET17 Registered	On-site	1.8	2.02	+0.22	10.07%
24/01555/F	On-site	1.30 habitat 0.23 hedgerow	1.62 habitat 0.26 hedgerow	+0.32 +0.03	24.65% habitat 13.12% hedgerow
24/01861/F	On-site	0.02	0.03	+0.01	77.04%
24/02103/F	On-site	0.04	0.05	+0.01	36.49%
25/00151/F	On-site	0.39	0.43	+0.04	10.30%
25/00501/F DET7 Registered	On-site	1.71	1.88	+0.17	10.21%
24/00866/F	On-site	4.01	4.43	+0.42	10.35%
24/01719/F	On-site	0.02	0.37	+0.35	1602.80%
24/01769/F DET09 Registered	On-site	0.43	0.51	+0.08	16.75%
25/00039/F	On-site	0.65	1.08	+0.43	65.80%

App ref	On or off-site	Pre development units	Post development units	Difference + or - units	Proposed % increase
25/00485/F	On-site	3.46 habitat 0.10 hedgerow	3.93 habitat 0.17 hedgerow	+0.47 habitat +0.07 hedgerow	13.54% habitat 73.34% hedgerow
24/02162/F	Habitat Off-site Hedgerow On-site	0.28 habitat 0.12 hedgerow	0.24 habitat 0.21 hedgerow	-0.04 +0.09	74.30% hedgerow On-site 10% habitat to be secured off site via condition
25/00339/F DET10 Registered	Habitat On-site Hedgerow Off-site	0.02 habitat 0.02 hedgerow	0.03 habitat 0.01 hedgerow	+0.01 -0.01	25.09% on-site and 10% (0.026 Units) purchased from Nature Impact at Land at Kensham Farm, Kent
24/01929/F	Off-site	9.27 habitat 3.29 hedgerow	4.47 habitat 3.27 hedgerow	-4.8 -0.02	10% to be secured off site via condition
24/02033/F	Off-site	1.39	0.80	-0.59	10% to be secured off site via condition
24/02356/F	Off-site	0.45 habitat 0.17 hedgerow	0.28 habitat 0.09 hedgerow	-0.17 -0.08	10% to be secured off site via condition

App ref	On or off-site	Pre development units	Post development units	Difference + or - units	Proposed % increase
25/00090/F	Off-site	2.71	2.69	-0.02	10% to be secured off site via condition
25/00210/F	Off-site	2.32	2.2	-0.12	10% to be secured off site via condition
25/00927/F	Off-site	0.57	0.12	-0.45	10% to be secured off site via condition
25/01087/F	Off-site	0.01 habitat 0.06 hedgerow	0.00 habitat 0.05 hedgerow	-0.01 habitat -0.01 hedgerow	10% to be secured off site via condition
25/01131/F	Off-site	0.32	0.19	-0.13	10% to be secured off site via condition
25/01315/F	Off-site	0.69 habitat 0.20 hedgerow	0.27 habitat 0.18 hedgerow	-0.42 habitat -0.02 hedgerow	10% to be secured off site via condition
25/01154/F DET13 Registered	Off-site	0.07	0.05	-0.02	10% (0.06 units) purchase off site at Land at Skinners Farmland, East Sussex

App ref	On or off-site	Pre development units	Post development units	Difference + or - units	Proposed % increase
25/01474/F DET12 Registered	Off-site	0.05	0.04	-0.01	10% (0.01 units) at the Habitat Bank at Iford Estate in Lewes

Plans to meet BNG for the next reporting period

- 5.20. The validation process and consultation with the County's Ecologist will continue to ensure the mandatory BNG requirements are being met by applicants and developers. The Council and County will work in partnership to ensure the correct information is submitted and considered during the planning application stage.
- 5.21. As this reporting period only covers a 23-month period since mandatory BNG came into force, only 8 planning approvals have discharged biodiversity conditions. However, as shown in table 7, there are a further 24 applications approved with conditions which will require discharging in the coming months. 6 of these have been registered and are awaiting decisions to discharge the condition.
- 5.22. Any issues with BNG implementation and monitoring will only become apparent once sites with BNG obligations are built out. This means that there must be ongoing appraisals of the process to help identify and correct any issues.
- 5.23. It is therefore important that data is collected more effectively so that BNG approvals can be monitored particularly regarding the long-term management of sites and the success of habitats created and enhanced. The Council will need to ensure a monitoring system is in place to make this easier to manage and enforce. Section 6 discusses the challenges regarding this, and section 7 includes the actions needed to address these potential issues.

6. Successes and challenges

Partnership working

- 6.1. Reigate & Banstead work with various partnership organisations to ensure the conservation and enhancement of biodiversity across the borough. Officers in the Council's Greenspaces and Planning teams attend a quarterly 'Biodiversity Working Group' which is organised by Surrey Nature Partnership, chaired by the Wildlife Trust and attended by ecologists and officers at Surrey County Council, Natural England, specific biodiversity groups and LPA officers in neighbouring authorities. Cross department issues and partner updates are discussed.
- 6.2. As well as working groups and officer collaboration with the County Council and neighbouring LPAs, Surrey Countryside Partnership (SCP) teams have been established and are supported by local communities and volunteers. Since June 2014 the three partnerships, Downlands, Lower Mole and Surrey Heathland, provide a combined service under the SCP team umbrella, whilst still retaining their individual partnership branding and working areas.
- 6.3. Reigate & Banstead work with the Downlands Partnership which covers the north of the borough. The Council also actively support other conservation volunteer groups that work on Council owned land. These groups help with several countryside management tasks such as invasive scrub clearance, access management, meadow management woodland management and pond conservation.
- 6.4. The Council provides funding for the Downlands Partnership and Gatwick Greenspace Partnership. Other volunteer groups operating in the borough are detailed below:
 - Friends of Merstham Parks and Greens
 - Nork Park Conservation Volunteers
 - The Woodchips - Chipstead Downs and Banstead Woods
 - Horley Conservation Group
 - The Reigate Area Conservation Volunteers (RACV)
 - Banstead Commons
- 6.5. Case studies that show how communities and partners have enhanced local spaces through tree planting initiatives will be available on the borough's website. Many of these projects are showcased in the greenspace volunteers' websites.
- 6.6. Projects by the Surrey Hills Partnership primarily focus on the conservation and enhancement of the local landscape and are delivered in partnership with the Council

and other bodies like the Downlands Partnership and Surrey County Council. ‘Making Space for Invertebrates’ is a key project which involves linking habitats and improving heterogeneity across the landscape by the creation of ponds, pond restoration, hedgerow planting and woodland management. Information regarding current Surrey Hills projects and their finding is available to view on the [Surrey Hills website](#).

6.7. In November 2025, Reigate & Banstead was awarded a Gold standard for its stewardship of the natural environment in the [South & South East in Bloom competition](#). Judges commended the dedicated work of staff and volunteers in managing and enhancing local habitats, which included the use of barley straw at Earlswood Lakes to control algae, restoration projects at Reigate Heath, and Himalayan balsam removal at Tanyard Meadows. Achieving Gold reflects the dedication of the Greenspaces team and the volunteers and their strong commitment to environmental sustainability and biodiversity.

Development Contributions

6.8. Table 8 details the projects financed through developer contributions via the Community Infrastructure Levy (CIL), demonstrating how development can support enhancements to the borough’s biodiversity.

Table 8: Biodiversity projects funded by CIL

Address	Project description	Status	Date
Tadworth, and in appropriate locations in Walton-on-the-Hill	Tree planting on street verges	Funds allocated	01.09.20
Park Farm Scout Camp Site	To contribute to the planting of replacement trees at Park Farm Scout Camp	Funds allocated	30.05.24
Banstead Wildlife Field, Basing Road, Banstead	To fund the purchase and installation of a replacement perimeter fence at (Banstead Wildlife Field Phase 2)	Funds allocated	01.08.25

Address	Project description	Status	Date
Across the Central East area of the borough	Tree planting on public land (also including allowing trees to grow naturally out of existing hedgerows and allowing grassed areas to grow into wildflower / grasses where possible to encourage pollinators).	Project completed	01.03.21
Woodhatch Pond, Pendleton Road, Woodhatch	Restoration of Woodhatch Pond	Project completed	01.05.21
Across the northeast area of the borough including Church Lane Avenue, Hooley	Tree planting on public land across the north-east area	Project completed	31.03.22
North-west corner of Burgh Heath by Chetwode Road	Improvements to the north-west corner of Burgh Heath, including clearing overgrown and dying vegetation and trees; remodelling area by Lonesome Pond to help reduce flooding; creation of 4 metres of all-weather footpath; purchase and installation of five QR post signs and two interpretation notice boards; supply and install two wooden benches; and maintain the woodland bank by Chetwode Road for two years on behalf of Reigate & Banstead.	Project completed	01.05.22
Banstead Common, Banstead Downs, Burgh Heath, Park Downs	To fund the purchase of a "Spearhead" multi-cut 200 tool for grass-cutting Heathland management.	Project completed	01.08.23

Address	Project description	Status	Date
Banstead Wildlife Field, Basing Road, Banstead	To fund replacement of dilapidated area around the sensory beds at Banstead Wildlife Field, Basing Road, Banstead.	Project completed	21.05.25
Both wards under the North-east Area Chipstead Downs (Stagbury A, Dene Farm, Stagbury Field, Coneyboro) and Hooley Meadows, the ponds in the Chipstead area in partnership with the Chipstead Village Preservation Society.	To contribute to essential vehicle extras for the new Toyota Hilux off-road vehicle to deliver local conservation grazing service with the Downlands Partnership (Proportion of land in north-east)	Project completed	22.05.25
Banstead Village and Nork wards of the North-west Area.	To fund essential vehicle extras for the new Hilux off-road vehicle to deliver local conservation grazing service with the Downlands Partnership	Project completed	22.05.25

Local Government Reorganisation

- 6.9. In December 2024, the [English Devolution White Paper](#) set out proposals for significant changes to the way local government is structured and organised, including the creation of new unitary councils in areas where local government is split between two tiers: county councils and district, or borough councils. On the 28 October 2025, the Government announced its decision to replace the current 12 councils in Surrey with two new unitary authorities.
- 6.10. Local government reorganisation presents opportunities and challenges for biodiversity delivery. During the transition to a unitary authority there could be disruption to staffing, governance, and strategic continuity. These changes may delay the adoption of a new Local Plan including a specific biodiversity policy with a higher net gain percentage than the statutory 10%. The reorganisation could also create uncertainty around roles and responsibilities for biodiversity-related functions.

6.11. Having said that, if biodiversity remains a priority throughout the transition, reorganisation offers a chance to embed nature recovery more holistically across services. The Council will continue to progress biodiversity actions, including statutory BNG obligations and the delivery of the Local Nature Recovery Strategy (when published), to ensure that nature recovery is not delayed during this period of change.

Long term delivery of BNG obligations

6.12. The Council is committed to ensuring that Biodiversity Net Gain obligations are not only secured at the planning stage but are delivered and maintained over the full 30-year period required by legislation. As section 5 demonstrates, planning conditions are being used to secure biodiversity gain plans which ensure that developers commit to measurable biodiversity enhancements.

6.13. However, ensuring these commitments are upheld over three decades presents a significant challenge. Long-term monitoring, management, and enforcement require robust governance structures, clear accountability, and adequate resourcing. Land ownership changes, evolving land use pressures, and ecological uncertainties can all undermine the durability of BNG measures. The council will work in partnership with Surrey County Council ecologists to develop a monitoring and reporting system that will prompt enforcement if needed in future years.

BNG exemption changes (2025)

6.14. On 16 December 2025, the Government announced a new area-based exemption from mandatory BNG for development sites up to 0.2 hectares. The justification for this is to ease the burden on small and medium-sized developers and streamline the planning process. The Government will also consult on an additional exemption for brownfield residential sites, potentially up to 2.5 hectares and will introduce measures to make it easier, quicker, and cheaper to deliver BNG offsite. A full consultation response and implementation timeline is anticipated in 2026.

6.15 While measures to simplify BNG off-site delivery are welcome, the scale of the new exemption is disappointing, given that most development within the borough occurs on small sites. As highlighted in Section 5, strong progress has been made in securing on-site habitat gains during the monitoring period. Had the exemption for sites under 0.2 hectares been in force since April 2024, 62.5% of eligible planning applications would have been excluded from BNG requirements. The Council will continue to apply BNG conditions to qualifying applications until the exemption formally comes into effect.

7. Future Actions

- 7.1. This section of the report explains how the Council plans to fulfil its biodiversity duty over the next 5 years through to 1 January 2031.
- 7.2. Many of the policies and actions that have been carried out to comply with the biodiversity duty to date will continue. These include the day-to-day management, and maintenance work, the community and staff engagement work and ensuring the biodiversity net gain obligations are being met. Volunteering projects will continue as well as partnership working and events to keep practitioners informed and updated on biodiversity matters.
- 7.3. There are several new actions that will be needed in the coming years. These relate to the delivery of the Local Nature Recovery Strategy (LNRS) and the development of a new Local Plan to guide development proposals.
- 7.4. As explained in section 6, there may be challenges in adopting the new Local Plan for the borough due to the Council's ongoing reorganisation into a unitary authority. However, policy work on the Local Plan will continue which will ensure that a future Local Plan (whether that is for the borough or the unitary) will contain policies that ensure biodiversity creation and enhancement remain central to development proposals and Council plans. The following table includes the planned actions and indicative timescales.

Table 9: Planned Actions and timescales

Team	Actions	Timescale
Greenspaces	Planned maintenance works Continue to look at providing ecological enhancements as part of planned maintenance works on a project-by-project basis.	On-going
Greenspaces	Annually review the Greenspaces Strategy Develop Implementation Plan Establish a biodiversity baseline and targets (alongside key partners) Develop management plans for areas of high ecological value	Annually
Greenspaces	Publish Tree Strategy	2026

Team	Actions	Timescale
Sustainability	Report annually on the actions set out in the Natural Environment theme of the Environmental Sustainability (ES) Action Plan.	Annually
Greenspaces Sustainability	Support community tree planting and wildlife measure initiatives. Supporting nature-based carbon offsetting measures on our land in furtherance of ES action. Reviewing measures to incorporate opportunities for tree planting, water retention, climate resilient species, shading.	On-going
Greenspaces	Continue to maintain watercourses on the Council estate and work with SCC and the EA on flood mitigation projects.	On-going
Regeneration	Commence public realm improvements at Horley High Street and subway as part of the partnership programme- Delivering Change in Horley Town Centre. This includes the introduction of street trees and planting to the High Street along with other measures such as SuDs.	January 2026
Environmental Health	Deliver the Council's Air Quality Action Plan and Strategy	Annually
Planning Greenspaces	Delivery of the Surrey LNRS Support the LNRS priorities and actions for habitat restoration, tree planting and biodiversity enhancements	After LNRS publication in 2026

Team	Actions	Timescale
Planning	<p>Preparing a new Local Plan with environmental policies covering:</p> <ul style="list-style-type: none"> • Priority habitats of principle importance • Protecting valued landscapes and their wildlife habitats • Nature-recovery and biodiversity • Eco-corridors and linkages • Urban greening • Trees and hedgerows <p>Consideration will also be given to applying higher Biodiversity Net Gain requirements to specific site allocations where justified and in line with national policy.</p>	By 2031
Planning	Using the Surrey LNRS to inform the evidence base, biodiversity policy and site allocations in the new Local Plan.	On-going.
Planning	Continued implementation of Biodiversity Net Gain requirements and working with landowners/managers to help deliver strategic offsets aligned with the Surrey LNRS.	On-going
Planning	Securing software to help manage Biodiversity Net Gain assessment, monitoring and reporting.	2026/27
Planning	Delivery and reporting of mandated Biodiversity Net Gain. Work with Surrey’s ecology team to ensure a system that can be monitored over 30 years.	On-going

Team	Actions	Timescale
Planning	<p>Stay informed and continue to monitor the implications of the Gatwick DCO decision.</p> <p>Check and approve the landscape and ecology management plan in line with requirement (8).</p> <p>Need to ensure that works teams do not impact more than necessary into Riverside Gardens Park. Tree removal will be extensive along the perimeter of Riverside Gardens Park. Keep check of the Arboricultural & Vegetation Method Statement.</p>	On-going

Appendix 1: Glossary of acronyms

Acronym	Full form
AGLV	Area of Great Landscape Value
AONB	Areas of Outstanding Natural Beauty (now Natural Landscape)
BNG	Biodiversity Net Gain
BOA	Biodiversity Opportunity Area
CIL	Community Infrastructure Levy
CS	Core Strategy
DCO	Development Consent Order
Defra	Department for Environment, Food & Rural Affairs
DMP	Development Management Plan
EA	Environment Agency
ES	Environmental Sustainability
GIS	Geographic Information System
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
LPA	Local Planning Authority
NERC	Natural Environment and Rural Communities
NL	National Landscape
NPPF	National Planning Policy Framework
RACV	Reigate Area Conservation Volunteers
RBBC	Reigate & Banstead Borough Council
SCC	Surrey County Council
SCP	Surrey Countryside Partnership
SNCI	Sites of Nature Conservation Importance
SPD	Supplementary Planning Document
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TPO	Tree Preservation Order
UKSPF	UK Shared Prosperity Fund