



Trading trees away: the wider BNG reforms and individual trees habitat

How the other proposed BNG changes – beyond the 0.2 hectare small-sites exemption – could add to the pressure on Individual trees habitat

The 0.2 hectare small-sites exemption, examined in our [companion briefing](#), is only one part of a wider package of Biodiversity Net Gain (BNG) reforms recently announced by Defra and now being brought forward in stages. Several of the other proposed changes point the same way for Individual trees habitat. Most work not by exempting sites outright, but by making it easier to remove trees on a development site and offset the loss – if at all – somewhere else. This note draws those threads together.

The odd one out in the BNG family

Individual trees habitat warrants special attention because it's the most unusual of all the habitats the biodiversity metric deals with. The features that make it unusual are precisely those that leave it exposed to the changes described below.

Every other habitat in the metric is a mapped parcel – a polygon of grassland, scrub or woodland and other habitats – measured by its area. By contrast, Individual trees habitat is entered by count and size class through the metric's 'tree helper', which assigns each tree a set 'area equivalent' size derived from its diameter at breast height using the root protection area formula in BS 5837. A tree's BNG value is therefore a notional figure acting as a proxy for its biomass, not the ground it occupies as is the case for other area habitats. For this reason, it 'oversails' the habitat beneath, and so is counted separately from it. That makes Individual trees habitat uniquely sensitive to how it is recorded, and to blunt BNG area thresholds such as the 25 m² de minimis floor or the new 0.2 hectare exemption.

It is also one of the slowest habitats to replace, by a wide margin. BNG assumes that habitat lost in one place can be recreated or improved elsewhere; and for grassland or scrub, a replacement can reach its target condition within just a few years. A felled mature tree cannot. Newly planted replacements are recorded as 'small' and need decades to deliver the lost canopy and biomass of their predecessor; several young trees are typically required to make good the loss of a single mature one. The 'create it elsewhere' logic on which most of these reforms are based therefore fails hardest, and for longest, when the habitat is a tree.

Much of an individual tree's worth is, moreover, locational: one that provides shade and cooling, air quality improvements, rainfall interception, landscape character as well as the everyday nature people actually encounter - all delivered precisely where the tree stands. None of this is captured by a biodiversity unit, especially when it's delivered elsewhere. Offsetting a lost urban or rural tree with habitat in another place delivers the number but not the thing that



mattered: the tree's amenity in its unique location. While most other habitats are mostly fungible, an individual tree, especially an urban one, is not.

Two further quirks compound the picture. First, the same trees can be recorded in various ways: as Individual trees habitat; folded into 'Woodland and forest' habitat; or treated as a line of trees in the hedgerow habitat. The choice materially changes the tree's recorded value. No habitat is more easily classified away. Second, trees are the only BNG habitat routinely governed by a separate, well-developed body of protections: Tree Preservation Orders, conservation-area controls, felling licences, and the irreplaceable-habitat status of ancient and veteran trees. That parallel regime is a strength, but it's also why the BNG reforms bite so unevenly: where those external protections happen to be absent, BNG is the only mechanism that systematically values the tree – and it's this value that is being pared back.

Changes to the minor-development hierarchy

The first change is a reordering of the biodiversity gain hierarchy for minor development. For minor sites that are not exempt – those above 0.2 hectares – the reforms allow developers to go straight to off-site gains, treating off-site provision as just as desirable as retention or enhancement on the site. The existing hierarchy's preference for keeping and improving habitat on site is precisely what tends to keep mature trees standing. Remove that preference and a developer may clear the on-site trees and buy permissible habitat units elsewhere, without having to show that on-site retention was tried first. The neighbourhood loses its canopy, while a parcel of new 'replacement' habitat, often some distance away, is recorded as the gain.

A second, related change compounds the first. The proposed shift to assessing spatial risk by Local Nature Recovery Strategy area – rather than by National Character Area boundaries – lets off-site units be sourced across a much larger area without the spatial-risk multiplier biting. That makes off-site provision cheaper and easier, so sacrificing on-site trees and offsetting them at a distance with qualifying habitat becomes the path of least resistance. For Individual trees habitat, which is overwhelmingly urban and valued precisely for being where people are, offsetting to a distant rural parcel is a poor exchange resulting in the 'greying' of many urban spaces.

A much larger change: exemption for brownfield

Potentially the most significant change for Individual trees habitat is a targeted exemption for residential brownfield development, on which the Government has consulted with thresholds tested up to 2.5 hectares. Brownfield and urban sites are exactly where mature urban trees are likely to be concentrated. An exemption at that scale would take sites more than ten times the size of the 0.2 hectare threshold out of BNG altogether – and with them, potentially, a great deal of established urban tree canopy. The consultation closed on 10 June 2026 and we await the Government's response; the eventual threshold, if any, will determine how much Individual trees habitat this removes from the regime.



‘Temporary’ loss that is anything but

A further proposed exemption covers temporary development – land reinstated within five years or less. For most habitats, temporary and reversible works are a reasonable candidate for exemption as they can be reinstated. However, individual trees habitat is the exception: felling a mature tree for a ‘temporary’ use is effectively permanent, because a replacement tree will take decades to restore the value of what’s been removed. Reinstating the land by planting replacement trees does not reinstate the trees to their pre-removal state, while exemption from the BNG regime would only compound the loss.

Parks, gardens and biodiversity-led schemes

Two more exemptions are directed at, respectively, schemes that enhance parks, playing fields and public gardens, and development whose primary objective is to conserve or enhance biodiversity. Both are well intentioned, but both impact land that often holds Individual trees habitat. Amenity green space is often full of mature trees, and ‘enhancement’ or habitat-creation works can themselves involve tree removal – for example, clearing trees to create a an open or play space. There is a real risk of trees being removed, sometimes in the very name of biodiversity, with no BNG offsetting to make good the loss.

The metric itself

Finally, the statutory biodiversity metric is being revised. If the revised metric simplifies or reduces how individual trees habitat is valued – through smaller area equivalents, or a lighter touch on the smallest sites – the metric ‘cost’ of removing a tree falls, and with it the incentive to retain trees. This depends on the final metric version, which remains uncertain, but it is worth watching: the value the metric places on Individual trees habitat is, ultimately, what gives their retention weight in a BNG calculation.

The common thread

Taken together, each of these changes makes it easier, in its own way, to remove Individual trees habitat where people actually live and to offset it – at best – with lower-value habitat elsewhere, steadily eroding local canopy. The priority-habitat carve-out offers no protection, because ordinary individual trees are not a priority habitat. The one countervailing move in the package is the extension of BNG to Nationally Significant Infrastructure Projects from November 2026, which tightens rather than loosens the regime – but that will do nothing for urban and garden trees on the small and medium sites where most of this pressure falls.

These are, moreover, proposals at different stages: some are confirmed and being brought forward, while others – the brownfield exemption in particular – await a government response, so their eventual scope and thresholds may change. And, as with the small-sites exemption, the protections that sit outside BNG entirely – Tree Preservation Orders, conservation-area



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controls, the irreplaceable-habitat rules, and local policies such as the Bristol Tree Replacement Standard – are untouched, and become correspondingly more important. Sadly, our experience is that they rarely prevent the loss of trees when the ‘greater need’ requires it.

This article is the author’s personal opinion and does not constitute legal or planning advice. It is a companion to [‘The 0.2 Hectare Exemption and the Quiet Consequence for Individual trees habitat’](#), and should be read alongside it. The reforms described reflect Defra’s April 2026 consultation response and subsequent announcements; several remain subject to consultation and may change.