Representations for the Thurrock Local Plan Viability Assessment

Biodiversity Net Gain and Thurrock Local Plan Viability Assessment

3 December 2025

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1. Introduction

Chequered Flag Land is engaged in the business of BNG Unit sales and makes these Representations on the treatment of Biodiversity Net Gain (BNG) within the Thurrock Local Plan Viability Assessment.

There are significant concerns about the assumptions, methodologies and cost figures used in the current assessment and the Essex study to which reference is made.

These issues undermine the robustness of the viability evidence base and could lead to unsound policy decisions.

The Representations are made following the invitation to do so at the Thurrock Local Plan Viability Assessment Workshops of 26 November 2025.

There has been limited time for preparation. This important issue will benefit from more detailed study and analysis.

2. Executive Summary

This document presents Chequered Flag Land Limited's formal representations on the treatment of Biodiversity Net Gain (BNG) within the Thurrock Local Plan Viability Assessment. The submission raises significant concerns regarding the assumptions, methodologies and cost figures used in both the Thurrock and Essex viability assessments. It argues that these assessments rely too heavily on theoretical modelling and outdated or unrepresentative cost data, failing to reflect actual market prices, statutory BNG Credit costs, and the real-world risks associated with BNG delivery.

Key issues highlighted include:

- **Underestimated Costs:** The current assessments use a central cost assumption of £25,000 per biodiversity unit, whereas recent market data shows prices ranging from £28,000–£35,000 for common habitats and much higher for specialist habitats. Statutory credits are significantly more expensive, and developers may need to purchase two credits for every unit shortfall.
- **Ignored Risk Multipliers:** The assessments do not adequately account for spatial risk multipliers, delivery risks, and scarcity factors, all of which can substantially increase costs and procurement challenges.
- **Market Availability Risks:** There is insufficient local supply of BNG units within the relevant National Character Areas (NCA 81 and NCA 111) to meet the demands of Thurrock developments, especially given competition from major infrastructure projects like the Lower Thames Crossing.
- **Recommendations:** The document calls for a revision of viability assumptions to reflect actual market-based costs, incorporation of risk multipliers, clearer terminology, empirical research, and a review of previous studies to ensure robust and sound policy decisions.

In summary, the representations urge Thurrock Council to revise its approach to BNG viability assessment, ensuring that policy and planning decisions are grounded in up-to-date market realities and statutory requirements to safeguard both ecological outcomes and development viability.

3. Recommendations

- Revise viability assumptions to reflect actual market-based BNG Unit costs and statutory BNG Credit prices.
- Incorporate spatial risk multipliers and scarcity factors into viability modelling.
- Account for competition for units within NCA 81 and NCA 111 and major project demands such as the Lower Thames Crossing and the National Grid Norwich to Tilbury Project.
- Ensure clear terminology distinguishing residential/commercial units from biodiversity units in all documentation.
- Undertake empirical research and market validation to support future viability assessments.
- Review and where necessary replace previous Assessments, Studies and Reports.

4. Challenging the Methodology

So far the Thurrock Local Plan Viability Assessment has relied on the Essex Viability Assessment of Biodiversity Net Gain. August 2024. This creates fundamental flaws in the analysis, reasoning and assessment required.

There is a lack of robust empirical data to justify their cost assumptions and methodology.

The figures presented rely heavily on theoretical modelling without validation against actual market transactions or delivery experience.

This absence of empirical evidence undermines the credibility of the viability evidence base and risks unsound policy decisions that could fail the NPPF tests of soundness.

In particular there is a failure to account adequately for:

- Spatial Risk Multipliers, which increase unit requirements when sourcing outside the same National Character Area (NCA).
- Delivery risk and time lag multipliers, embedded in the DEFRA metric.
- The scarcity of certain habitat types, particularly watercourse units, which are in short supply nationally. Ignoring these factors underestimates costs and availability risks.
- NCA 111 Market Availability

References:

“Costs were derived through an examination of previous research into habitat creation costs, including Defra Impact Assessment and the supporting Assessing the Cost of Environmental Land Management in the UK report. Alongside this evidence from previous projects carried out by Temple involving onsite habitat creation, and input from external companies and technical experts were considered.”

“An assumption that each biodiversity unit costs £25,000 was made based on information from ECC and supported by a review of published literature, with market rates typically ranging between £20,000 to £35,000 per unit, although some habitats may significantly exceed this. Further details of the cost review are provided in Annex B.

- Essex Viability Assessment of Biodiversity Net Gain. August 2024

5. Challenging the Suggested BNG Costs in the Thurrock Viability Assessment

Challenge the Essex Study's Cost Assumptions

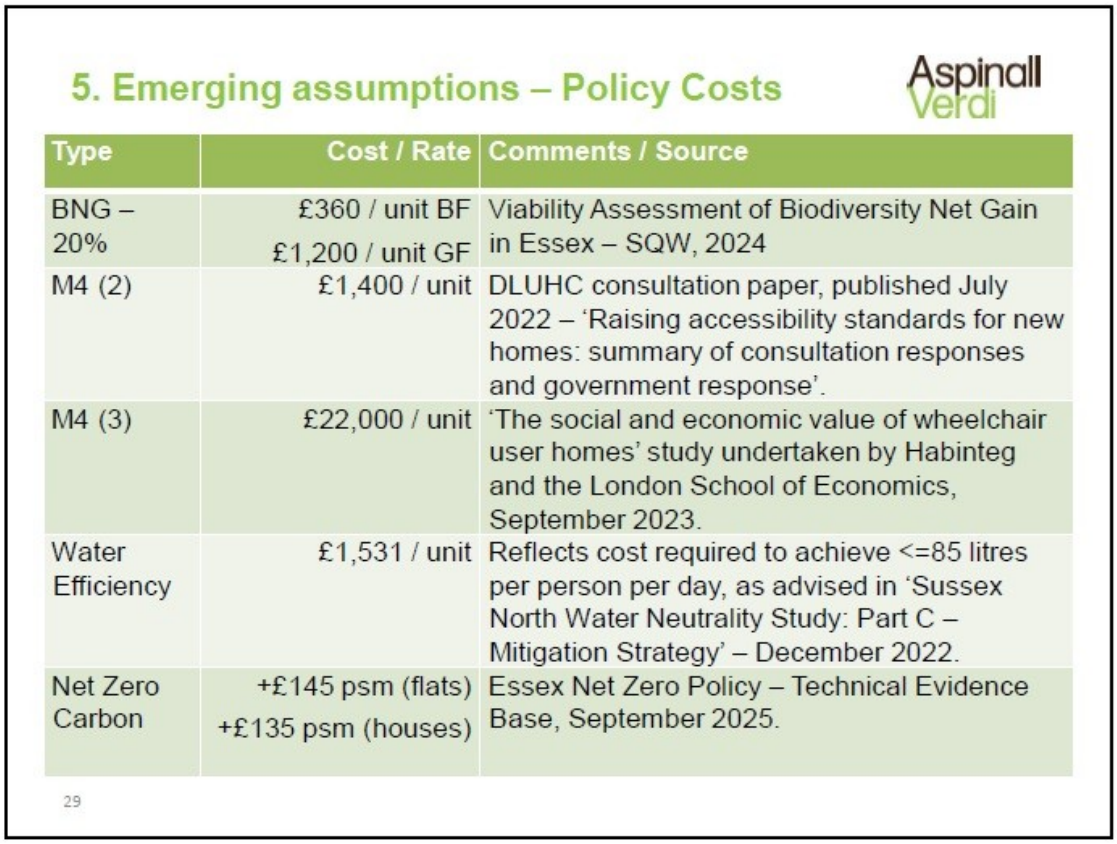
The Essex study's assumption of £25,000 per biodiversity unit is more conservative than emerging market trends.

Market data suggests Recent reports show unit prices for common habitats averaging £28,000–£35,000, with specialist habitats exceeding £65,000.

Furthermore, statutory credits cost £42,000–£650,000 per credit, and developers must buy two credits for every biodiversity unit shortfall.

The figures proposed at the recent stakeholder consultation - £360 per unit for brownfield and £1,200 per unit for greenfield - are wholly unrealistic.

These numbers do not reflect the cost of delivering BNG under statutory requirements, which include habitat creation, management, and monitoring for 30 years.



5. Emerging assumptions – Policy Costs

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Type	Cost / Rate	Comments / Source
BNG – 20%	£360 / unit BF £1,200 / unit GF	Viability Assessment of Biodiversity Net Gain in Essex – SQW, 2024
M4 (2)	£1,400 / unit	DLUHC consultation paper, published July 2022 – 'Raising accessibility standards for new homes: summary of consultation responses and government response'.
M4 (3)	£22,000 / unit	'The social and economic value of wheelchair user homes' study undertaken by Habinteg and the London School of Economics, September 2023.
Water Efficiency	£1,531 / unit	Reflects cost required to achieve <=85 litres per person per day, as advised in 'Sussex North Water Neutrality Study: Part C – Mitigation Strategy' – December 2022.
Net Zero Carbon	+£145 psm (flats) +£135 psm (houses)	Essex Net Zero Policy – Technical Evidence Base, September 2025.

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Thurrock Local Plan Viability Assessment Workshop Materials 26 November 2025

5. Challenge the Suggested BNG Costs in the Thurrock Viability Assessment (continued)

The following is taken from the Essex Viability Assessment of Biodiversity Net Gain. August 2024;

1. Standard Cost Assumption for Offsite BNG Units

£25,000 per biodiversity unit is the central figure used for costing the purchase of offsite BNG units in Essex. This is based on evidence from Essex County Council, consultation with the Essex Local Nature Partnership, and a review of published literature and market rates.

The documents note that:

- Market rates typically range between £20,000 and £35,000 per unit.
- DEFRA's Market Analysis study (2021) estimated £20,000 per unit, rising to £25,000 per unit in areas of scarcity.
- Statutory government credits are intentionally set at a higher rate and are not considered in the viability calculations for Essex. [Annex B -…n Analysis | PDF]

2. Onsite Habitat Creation, Enhancement, Management, and Monitoring Costs

Onsite BNG delivery costs vary by habitat type and development typology. The technical annex provides detailed tables, but the main report summarises typical costs for achieving 10% and 20% BNG onsite for different development scenarios:

- Greenfield sites: Onsite costs for 10% BNG range from about £74,150 to £2,470,000 (depending on site size), with 20% BNG costing up to £2,856,500 for the largest typology.
- Brownfield sites: Onsite costs for 10% BNG range from £675 to £38,256; for 20% BNG, up to £51,756 for the largest typology.
- Commercial/industrial sites: Onsite costs for 10% BNG range from £150 to £18,810; for 20% BNG, up to £19,800. [Essex Viab…ugust 2024 | PDF]

3. Cost per Dwelling for Enhanced BNG

- The additional cost of increasing BNG from 10% to 20% is:
  - £2–£27 per residential unit on brownfield sites.
  - £77–£308 per residential unit on greenfield sites.
- For a further increase to 50% BNG, the additional cost is:
  - £20–£214 per residential unit on brownfield sites.
  - £636–£1,232 per residential unit on greenfield sites. [Essex Viab…ugust 2024 | PDF]

4. NSIP (Nationally Significant Infrastructure Projects) Case Study

For large infrastructure projects (e.g., Norwich to Tilbury), the cost of purchasing offsite BNG units is also assumed at £25,000 per unit. However, project teams have warned that statutory credits could be much higher, potentially doubling the cost if local supply is insufficient. [Essex Viab…ugust 2024 | PDF]

Key Context and Caveats

- **The £25,000 per unit figure is a working assumption for viability testing.** Actual costs may vary depending on market supply/demand, habitat type, and whether statutory credits are required.
- **Onsite costs** include creation, management, and monitoring over a 30-year period, but exclude land acquisition (which is covered elsewhere in the viability appraisal).
- **Offsite costs** are based on purchasing biodiversity units from the market, with the expectation that local supply will keep costs at or below £25,000 per unit.
- **Statutory credits** (if used) would be significantly more expensive, and their use is considered a last resort.

5. Challenge the Suggested BNG Costs in the Thurrock Viability Assessment (continued)

Supporting Evidence from the Documents

- **Annex B** provides a breakdown of cost sources, including DEFRA studies, Environment Bank, Arcadis research, and direct consultation with Essex stakeholders. It confirms the £25,000 per unit figure as central, with market rates ranging from £20,000 to £35,000 per unit. [Annex B -…n Analysis | PDF]
- **Main Report** summarises the cost per dwelling and per unit for different development typologies, consistently using the £25,000 per unit assumption for offsite BNG. [Essex Viab…ugust 2024 | PDF]

Summary Table: BNG Unit Cost Figures

Cost Type	Figure Used in Essex Assessment	Source/Notes
Offsite BNG Unit (market)	£25,000 per unit	Central assumption, market rates £20k–£35k
Onsite BNG (per ha)	Varies by habitat/typology	See detailed tables in Annex B
Additional cost per dwelling (20% BNG)	£2–£27 (brownfield), £77–£308 (greenfield)	Main report scenario testing
Statutory Credit	Higher than £25,000 per unit	Not used for viability, but flagged as risk

These suggestions are wholly at odds with current planning practice, biodiversity assessments and market experience.

We refer below to;

The Arena Essex commercial development where the cost of BNG acquisition could be;

- £11,333,400 for BNG Units
- £45,333,600 for BNG Credits.

The Braiswick, Colchester 27 dwelling residential development where the cost of BNG acquisition based on the Essex study's figures would be;

- £ 343,800 for BNG Units equating to £12,733 per dwelling
- £1,004,400 for BNG Credits equating to £37,200 per dwelling.

6. How BNG Works

The Biodiversity Net Gain (BNG) rules, introduced under the Environment Act 2021, require most new developments in England to achieve a minimum 10% increase in biodiversity compared to the pre-development baseline.

The aim is to ensure that development leaves the natural environment in a measurably better state, helping to reverse the UK's trend of nature decline.

The BNG requirement was implemented in a phased approach in England:

- 12 February 2024: Mandatory for major developments.
- 2 April 2024: Extended to small developments.
- May 2026 (expected): Will apply to Nationally Significant Infrastructure Projects (NSIPs).

Summary of the BNG Rules

The BNG rules are a condition of planning permission and involve several key requirements:

- Measurable Gain: Developers must use the statutory Biodiversity Metric tool to calculate the pre-development and post-development biodiversity value (measured in "units") of a site and demonstrate a gain of at least 10%.
- Biodiversity Gain Plan: A detailed plan outlining how the BNG will be achieved must be submitted to and approved by the local planning authority before development can begin.
- Mitigation Hierarchy: Developers must follow a hierarchy of actions:
    1. Avoid or reduce negative impacts on biodiversity on-site first.
    2. Mitigate unavoidable impacts.
    3. Compensate for residual losses through on-site enhancement or creation.
    4. Use registered off-site gains (on the developer's land elsewhere or by purchasing BNG Units from a Habitat Bank).
    5. Purchase statutory biodiversity credits from the government as a last resort.
- Long-term Management: On-site and off-site habitat enhancements must be legally secured and maintained for a minimum of 30 years, often through Section 106 agreements or conservation covenants.

The BNG rules now require all developments to achieve at least 10% net gain in biodiversity value, measured using the statutory DEFRA metric.

This involves:

- Baseline habitat assessment.
- Calculation of biodiversity units lost and required.
- Delivery through on-site habitat creation, off-site units, or statutory credits. BNG must be secured for 30 years via legal agreements.

7. How National Character Areas Work

BNG policy incentivises local delivery through National Character Areas.

England is divided into 159 NCAs, which reflect natural landscape boundaries rather than administrative ones.

This mechanism ensures ecological connectivity and local nature.

The majority of Thurrock is within **NCA 111 (Northern Thames Basin).**

The smaller part of Thurrock is in **NCA 81 (Greater Thames Estuary).**

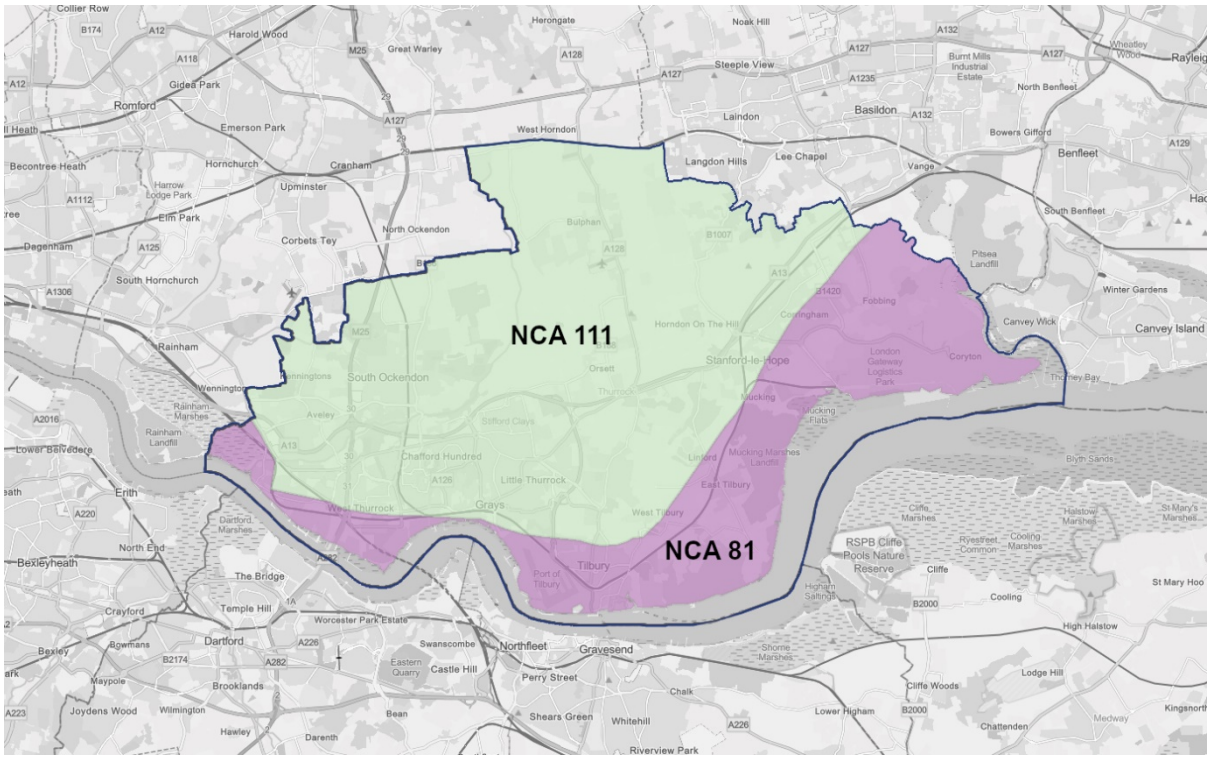
Combining the two NCAs, Thurrock is in the same National Character Area as;

Region	Local Authorities
Essex	Basildon, Brentwood, Castle Point, Chelmsford, Colchester, Maldon, Rochford, Southend, Tendring
Greater London	Barking & Dagenham, Barnet, Brent, Ealing, Enfield, Greenwich, Harrow, Havering, Hillingdon, Hounslow, Newham, Redbridge, Richmond, Waltham Forest
Hertfordshire	Broxbourne, East Hertfordshire, Epping Forest, Hertsmere, St Albans, Three Rivers, Watford, Welwyn Hatfield
Kent	Bexley, Dartford, Gravesham, Medway

NCA 111 covers 251,000 Ha. It is the 6th largest NCA in England.

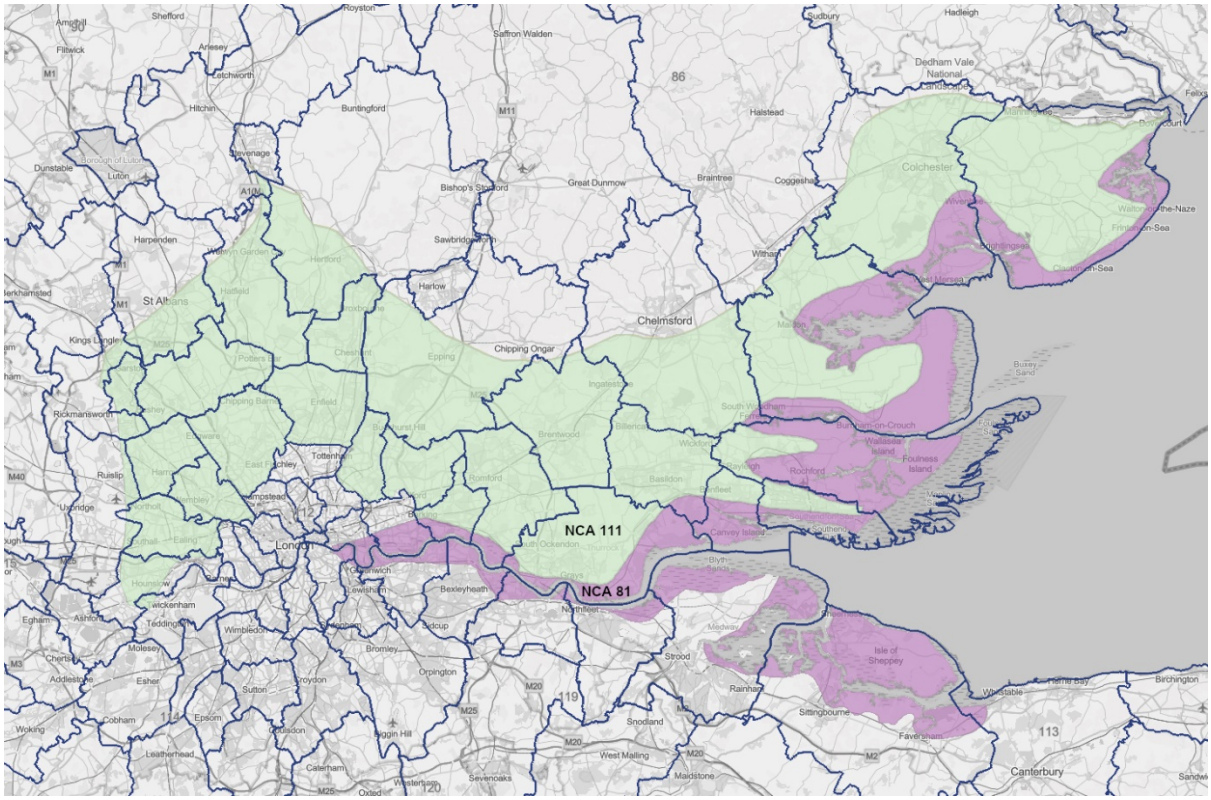
Among all NCAs, the one with the largest population is the Northern Thames Basin, with an estimated population of around 3,000,000 people.

As a result Thurrock developments face competition for BNG Unit acquisition from developments in these local authority areas.



Thurrock National Character Areas

7. How National Character Areas Work (continued)



NCA 81 Greater Thames Estuary & NCA 111 Northern Thames Basin

8. Spatial Risk Multiplier

Spatial Risk Multiplier (SRM) Rules

The SRM adjusts the number of biodiversity units required based on the location of habitat delivery relative to the development site:

Location of Habitat Delivery	SRM	Effect
On-site (same development site)	1	No increase
Off-site within same Local Planning Authority (LPA) or same NCA	1	No increase
Off-site in an adjoining NCA	1.5	50% more units required
Off-site outside LPA and not adjoining NCA	2	Double the units required
Statutory credits (always considered distant)	2	Double the units required

As a result, if a development loses 10 biodiversity units:

- On-site or same NCA: 10 units needed.
- Adjoining NCA: 15 units needed (SRM = 1.5).
- Outside LPA and not adjoining NCA: 20 units needed (SRM = 2).
- Statutory credits: 20 credits needed (and at statutory prices, this is very expensive).

9. How BNG Credits Work

Statutory biodiversity credits are a last resort when on-site and off-site options are exhausted or are not available.

Credits are sold by Natural England at prices fixed to avoid undercutting the private market.

Developers must buy two credits for every one biodiversity Unit shortfall.

BNG Credit Prices

Current statutory credit prices start at £42,000 per credit for common habitats, rising to £650,000 for rare habitats. These prices exclude the spatial multiplier effect, which doubles the number of credits required.gov

Low Distinctiveness

Broad Habitat Type	Specific Habitat Type	Price per Credit	Tier
All	All	£42,000	A1

Medium Distinctiveness

Broad Habitat Type	Specific Habitat Type	Price per Credit	Tier
Heathland and shrub	All	£42,000	A1
Grassland	All	£42,000	A1
Individual trees	All	£42,000	A1
Urban	All	£42,000	A1
Cropland	All	£42,000	A1
Woodland and forest	All	£48,000	A2
Intertidal sediment	All	£48,000	A2
Lakes	Reservoirs	£125,000	A4
Lakes (non-priority)	Ponds	£125,000	A4
Sparsely vegetated land	Other inland rock and scree	£125,000	A4

High Distinctiveness

Broad Habitat Type	Specific Habitat Type	Price per Credit	Tier
Wetland	Reedbeds	£42,000	A1
Grassland	Traditional orchards	£42,000	A1
Grassland	Lowland calcareous grassland	£48,000	A2
Heathland and shrub	Lowland heathland / Upland heathland	£48,000	A2
Woodland and forest	Wet woodland / Upland birchwoods	£66,000	A3
Intertidal sediment	Littoral mud / mixed sediments / reefs	£66,000	A3
Wetland mosaic	Floodplain wetland mosaic	£125,000	A4
Ponds	Priority habitat ponds	£125,000	A4
Coastal lagoons	Coastal lagoons	£125,000	A4
Rocky shore	Littoral rock (all energy levels)	£125,000	A4
Coastal saltmarsh	Saltmarshes and saline reedbeds	£125,000	A4
Woodland and forest	Lowland mixed deciduous / beech / oakwood	£125,000	A4
Lakes	High/Low/Moderate alkalinity lakes, Marl, Peat lakes	£650,000	A5

9. How BNG Credits Work (continued)

Linear Habitats

Habitat Type	Price per Credit
Hedgerow	£44,000
Watercourses	£230,000

10. BNG Unit Market Availability

Thurrock developments must compete for BNG Units with the developments in the other 29 NCA 111 Local Authorities.

As a result competition for BNG Units for Thurrock developments is significant.

Lower Thames Crossing, a £9bn infrastructure project, will generate substantial demand for BNG units and statutory credits, with commitments to habitat creation and green bridges.

The Lower Thames Crossing (LTC) is classed as a Nationally Significant Infrastructure Project (NSIP), so its biodiversity net gain (BNG) requirements follow the framework set out in the Environment Act 2021 and associated guidance for NSIPs:

Key BNG Requirements for Lower Thames Crossing

1. Mandatory 10% Biodiversity Net Gain
    - All NSIPs, including LTC, must deliver at least a 10% increase in biodiversity value compared to the pre-development baseline.
    - This is calculated using the Defra Biodiversity Metric
2. BNG Delivery Options
    - Gains can be achieved on-site, off-site, or through statutory biodiversity credits if on-site delivery is not feasible.
    - For LTC, given the scale and habitat loss (including ancient woodland), significant off-site compensation is expected.
3. Long-Term Habitat Management
    - Habitat improvements must be secured for at least 30 years via legal agreements such as conservation covenants or planning obligations.

The BNG Unit requirement unknown but is estimated to be in excess of 2,150 Units.

National Grid Norwich to Tilbury Project

The BNG Unit requirement is unknown.

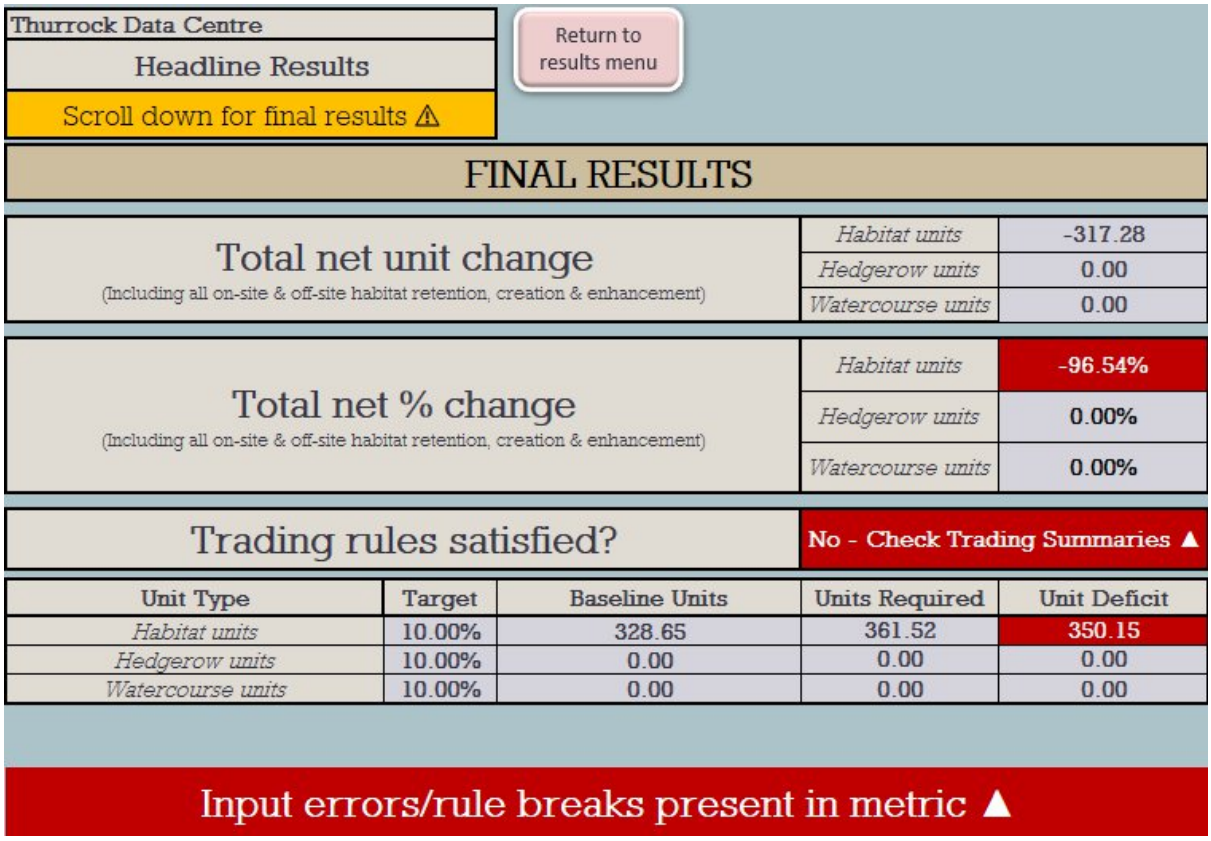
10. BNG Unit Market Availability (continued)

Specific Example 1

Google has made an application for outline planning permission to build a data centre on the Arena Essex site in Thurrock (NCA 111).

Arena Essex redevelopment will require significant off-site BNG due to loss of open space and leisure land.

The Metric identifies the following requirements;



Thurrock Data Centre

Headline Results

Scroll down for final results ⚠

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FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-317.28
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-96.54%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?		No - Check Trading Summaries ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	328.65	361.52	350.15
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Input errors/rule breaks present in metric ▲

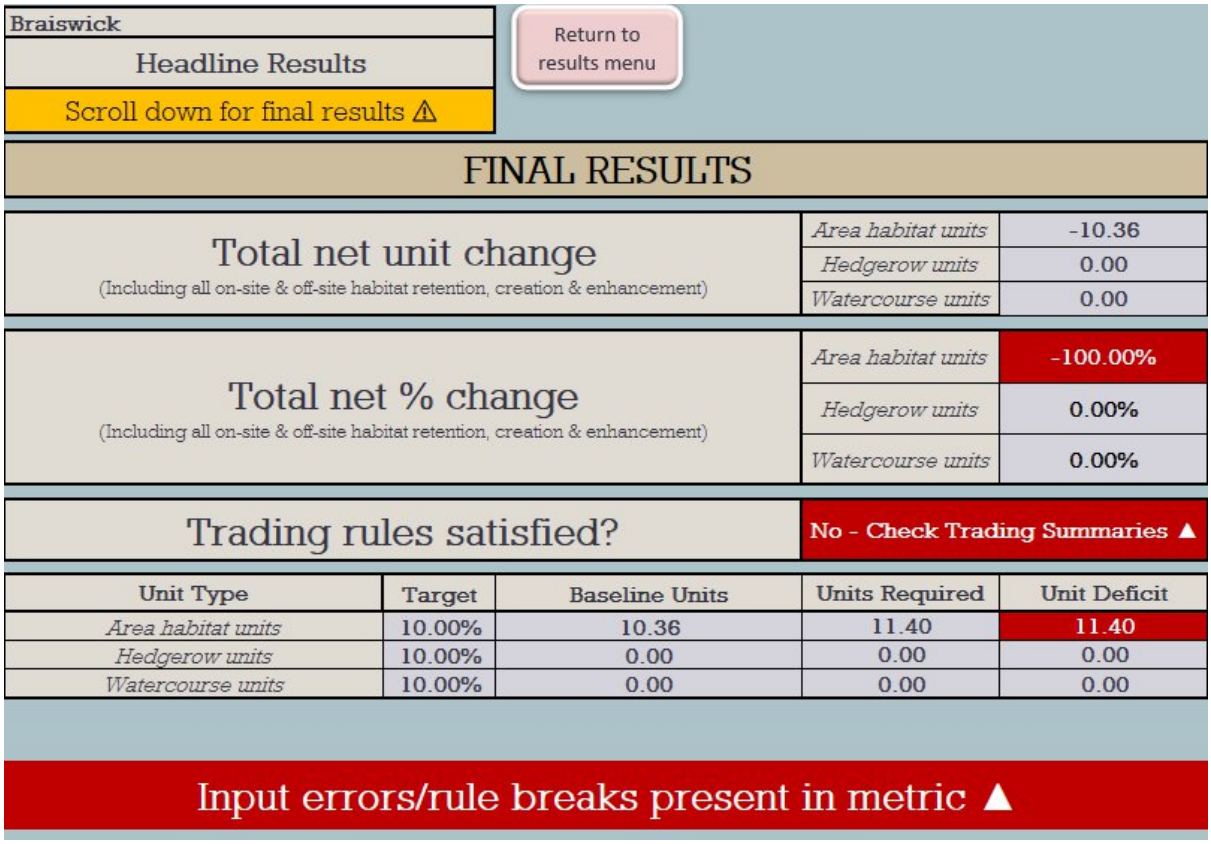
BNG Unit / BNG Credit costs are estimated as follows:

Distinct -iveness	Broad Habitat Type	Specific Habitat Type	BNG Units Required	BNG Unit Price	BNG Unit Total	BNG Credit Price	BNG Credit Total
High	Grassland	Lowland calcareous grassland	0.27	£ 24,000	£ 6,480	£ 48,000	£ 25,920
High	Urban	Open mosaic habitats on previously developed land	172.06	£ 24,000	£ 4,129,440	£ 48,000	£ 16,517,760
High	Woodland and forest	Lowland mixed deciduous woodland	100.08	£ 62,500	£ 6,255,000	£125,000	£ 25,020,000
Medium	Grassland	Other neutral grassland	16.92	£ 21,000	£ 355,320	£ 42,000	£ 1,421,280
Medium	Heathland and shrub	Mixed scrub	25.6	£ 21,000	£ 537,600	£ 42,000	£ 2,150,400
Low	Grassland	Modified grassland	2	£ 21,000	£ 42,000	£ 42,000	£ 168,000
Low	Urban	Bare ground	0.36	£ 21,000	£ 7,560	£ 42,000	£ 30,240
			317.29		£ 11,333,400		£ 45,333,600

10. BNG Unit Market Availability (continued)

Specific Example 2

An application for planning permission for a 27 dwelling residential site in Braiswick, Colchester (NCA 111) identifies the following requirements.



Braiswick

Headline Results

Scroll down for final results ⚠

Return to results menu

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Area habitat units*	-10.36
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Area habitat units*	-100.00%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?		No - Check Trading Summaries ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	10.36	11.40	11.40
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Input errors/rule breaks present in metric ▲

BNG Unit / BNG Credit costs are estimated on the standard cost range suggested in the Essex Viability Assessment of Biodiversity Net Gain Analysis 2024 as follows:

Distinct -iveness	Broad Habitat Type	Specific Habitat Type	BNG Units Required	BNG Unit Price *	BNG Unit Total	BNG Credit Price	BNG Credit Total
Medium	Grassland	Other neutral grassland	7.10	£ 30,000	£ 213,000	£ 42,000	£ 596,400
Medium	Heathland and shrub	Mixed scrub	0.88	£ 30,000	£ 26,400	£ 42,000	£ 73,920
Medium	Woodland and forest	Other woodland; broadleaved	0.84	£ 30,000	£ 25,200	£ 48,000	£ 80,640
Medium	Woodland and forest	Other woodland; mixed	2.64	£ 30,000	£ 79,200	£ 48,000	£ 253,440
			11.46		£ 343,800		£ 1,004,400

* Based on the standard cost range suggested in the Essex Viability Assessment of Biodiversity Net Gain Analysis 2024

11. BNG Market Availability Risk

There are no BNG Units currently available in NCA 81.

There are 314 Ha of BNG Units currently available in NCA 111.

The current 314 Ha of BNG Unit availability in NCA 111 is insufficient to meet the anticipated requirements of the Lower Thames Crossing and Arena Essex developments.

As a result there is insufficient BNG Unit supply in NCA 81 and NCA 111 to satisfy the demands of Thurrock Developments.

For the viability assessment to be robust and accurate, the prevailing market factors must be taken into account.

The viability assessment;

- should not be based on the assumption that BNG Unis can be sourced locally
- should be based on the assumption that it will be necessary to source BNG Credits in which case two BNG Credits will be required for each Unit shortfall.

The following constraints should be taken into account;

1. Limited Supply of Biodiversity Units

- Local habitat banks may have a finite number of units available, especially in high-growth areas where multiple developments compete for offsets.
- If demand exceeds supply, developers may face:
  - Price inflation (units becoming more expensive)
  - Delays in securing units, which can stall planning approvals.

2. Geographic Constraints

- The Environment Act requires offsets to be delivered within the same local planning authority or National Character Area where possible.
- If local supply is exhausted, developers may need to source units from further afield, which:
  - Increases costs (transport, legal agreements)
  - May require higher multipliers under the Biodiversity Metric (e.g., 1.5x or 2x units for distant sites).

3. Market Maturity

- The BNG market is still developing. Risks include:
  - Uncertainty in pricing (currently £20k–£50k per unit, but could rise sharply)
  - Lack of transparency in habitat bank pipelines
  - Regulatory changes affecting eligibility of certain habitats or schemes.

4. Timing Risk

- Developers must secure BNG before planning permission is granted.
- If units are not available at the right time:
  - Planning determination may be delayed
  - Developers may need to front-load costs or enter speculative agreements.

11. BNG Market Availability Risk (continued)

5. Viability Implications

- Availability risk should be reflected in viability testing by:
  - Adding a contingency allowance (eg. 50–75% uplift on unit cost)
  - Sensitivity scenarios for high-cost and delayed procurement
  - Considering alternative compliance routes (eg. on-site delivery, strategic partnerships).

12. Conclusion

The current / proposed viability assumptions for BNG in Thurrock are fundamentally flawed.

They underestimate costs, ignore statutory multipliers, and fail to reflect market realities.

Thurrock Council is urged to:

- Revise BNG cost assumptions to align with actual market prices and statutory credit costs.
- Incorporate spatial and delivery risk multipliers into viability modelling.
- Recognise the cumulative demand from major projects and housing developments in Essex, the risk to market availability and the impact on costs and viability.

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3 December 2025