

Can we trust BNG for woodland?

A report for the Woodland Trust

By

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Executive Summary

The overall effect of the BNG metric for trees is mixed:

- BNG can help to protect existing trees and woods by putting a high value on difficult to recreate habitats thus protecting them from development pressure.
- The corollary of this is to disincentivise the creation of new woodland habitat, for which there is relatively little demand and has a relatively low compensatory unit value as it is regarded as time-consuming and difficult to create.

There is limited availability and demand for woodland BNG units:

- There has been very limited demand for offsite woodland habitat with those sales of woodland units which have taken place being very small in hectareage.
- BNG is not stimulating the creation of new high value wooded habitat and there have yet to be any commitments to create such woodland types.
- Units available on the BNG register are predominantly grassland habitats. Those woodland units which are present predominantly relate to the enhancement of existing woodland.

BNG is unlikely to stimulate a significant contribution to policy objectives such as the Environment Act targets involving trees:

- Those considering off-site habitat banking are unlikely to prioritise woodland as the metric does not offer significant reward for long-term quality in creation or management.
- Limited improvements to the metric are possible to address the above points but are constrained by the need to protect existing trees and woods.

More thought and research are required to understand how BNG might interact with the woodland carbon codes and other emerging credit systems. We emphasise the need for an overall nature finance system, across public and private sources, that achieves overall conservation objectives.

Abstract

Biodiversity net gain is envisaged to become one of the Westminster government's main tools for financing nature conservation. However, BNG has a widely known emphasis on the creation of fast-maturing habitats, such as grassland, and its potential impacts on woodland are unstudied. Here we outline the relationship between BNG and woodlands. Firstly, we show how the BNG metric works and demonstrate how this biases the mechanism against the creation and enhancement of woodland in its very construction. Then, we report the results of a model which simulates the transitions of every habitat type into every other possible habitat type, to evaluate how many units one can deliver through creating or enhancing woodland relative to other habitat types, which yields insights into whether landholders will be incentivised to deliver woodland over other habitat types under BNG. The results demonstrate that woodland is generally outperformed by other habitats, meaning that it is unlikely BNG will incentivise much woodland creation. Next, we report the results of an analysis to extract all of the information about what habitats are being delivered through the off-site BNG network to evaluate the degree to which the BNG market is delivering woodland in reality. Lastly, we explore other important policy linkages. The overall conclusion is that BNG provides a strong incentive to avoid woodland destruction but, in doing so, is both theoretically and empirically biased against the creation of new woodland, so is unlikely to finance woodland creation.

Assessment of how BNG treats woodland creation

Between 2015 and 2024, development was responsible for approximately half of the total woodland loss recorded in England (Newsome 2024). Biodiversity Net Gain requires that most new terrestrial developments demonstrate a 10% increase in biodiversity value, calculated using the habitat-based Statutory Biodiversity Metric (Figure 1, hereafter called the metric). Woodland habitats range from low to very high distinctiveness within the metric (see Table 1 for woodland classifications within BNG). Due to trading rules in the metric, losses of high distinctiveness woodland habitats must be replaced through the creation or enhancement of the same specific habitat. Low distinctiveness woodland can be replaced through the creation of any low distinctiveness or higher habitat. Medium distinctiveness woodland can be replaced through the creation or enhancement of any medium distinctiveness woodland or any high distinctiveness habitat. Very high distinctiveness woodland should be replaced with units of the same specific habitat type where possible, or if that is not possible, losses should be replaced through 'appropriate' units of other very high distinctiveness habitats or, if that is not possible, through 'appropriate' units of a high distinctiveness habitat. Ancient woodland and ancient and veteran trees are deemed 'irreplaceable' within the metric and excluded from BNG calculations, instead requiring bespoke compensation.



Baseline Biodiversity Units =

Size x Distinctiveness x Condition x Strategic Significance*



Post-intervention Biodiversity Units =

Size x Distinctiveness x Condition x Strategic Significance

x Difficulty x Time x Spatial Multipliers

Figure 1: Baseline and post-intervention biodiversity units as calculated by the statutory biodiversity metric. Additional risk multipliers in the calculation of post-intervention biodiversity units are highlighted with a red box. For new non-exempt planning applications submitted in areas where a Local Nature Recovery Strategy (LNRS) has been published, the Strategic Significance multiplier for all baseline habitats is set to 1, so has no effect on the number of units.

Due to the timescales required for woodland to develop the features required for high distinctiveness, created woodlands can only be listed as high distinctiveness where they are compensating for the loss of an existing high distinctiveness woodland. In these cases, the created woodland's condition will generally be limited to 'poor' or 'moderate', depending on the exact woodland type, unless a legal agreement securing the habitat for longer than the standard 30-years is put in place. All other woodland creation is limited to one of the medium distinctiveness woodland types (see Table 1). This, combined with the risk multipliers in the metric (Figure 1) which reduce the unit value of habitats that take a long time to mature and/ or are difficult to create to account for time lags and uncertainty of success (see Table 1 for values for different woodland habitats), incentivises the avoidance of impacts on high value and difficult to recreate habitats but simultaneously disincentivises their creation.

The impact of risk multipliers is so great that, in many cases, woodland creation results in a loss of units, even with a very low value baseline (Miles et al. 2025). This poses a problem as, if only enhancement of existing woodlands or creation of other habitats is used to account for losses of woodland, there will be a reduction in overall woodland cover, contrary to the Environmental Improvement Plan target of increasing woodland cover in the UK to 16.5% by 2050 (HM Government 2023). As such, the statutory metric user guide states that where woodland is lost, "woodland creation should be considered, alongside enhancement, to avoid an overall loss of woodland cover and support government targets" (Defra 2024b, 16).

Table 1: Woodland habitat types within the statutory metric, their distinctiveness and risk multipliers, numeric value used in the metric is given in brackets. Habitats of Principle Importance are marked with an asterisk (*). Technical difficulty is given for both enhancement (i.e. enhancement of an existing woodland to higher distinctiveness woodland or higher condition) and creation (i.e. creation of woodland on a non-woodland habitat).

Woodland Type	Distinct-iveness	Creation Difficulty	Enhancement Difficulty	Creation time to moderate condition
Wood-pasture and parkland*	Very High (8)	Very High (0.1)	High (0.33)	30+ years (0.32)
Lowland beech and yew woodland*	High (6)	High (0.33)	High (0.33)	30+ years (0.32)

Lowland mixed deciduous woodland*	High (6)	High (0.33)	High (0.33)	30+ years (0.32)
Native pine woodlands	High (6)	High (0.33)	High (0.33)	30+ years (0.32)
Upland oakwood	High (6)	High (0.33)	High (0.33)	30+ years (0.32)
Upland mixed ashwoods*	High (6)	High (0.33)	High (0.33)	30+ years (0.32)
Upland birchwoods	High (6)	Medium (0.67)	Medium (0.67)	25 years (0.410)
Wet woodland*	High (6)	Medium (0.67)	Medium (0.67)	15 years (0.586)
Other Scot's pine woodland	Medium (4)	Medium (0.67)	Medium (0.67)	30+ years (0.32)
Other woodland; broadleaved	Medium (4)	Low (1)	Low (1)	15 years (0.586)
Other woodland; mixed	Medium (4)	Low (1)	Low (1)	30 years (0.343)
Other coniferous woodland	Low (2)	Low (1)	Low (1)	30 years (0.343)

Individual trees are also classed as a medium distinctiveness area-based habitat, either 'urban tree' or 'rural tree'. Their area is calculated based on their diameter at breast height (DBH). Each individual tree requires a separate condition assessment, unless found within an urban line, block, or group of trees. As they are medium distinctiveness, any trees removed must be replaced within the same broad habitat type, i.e. through the planting of more individual trees.

A significant concern during the introduction of BNG was that landowners would deliberately degrade habitats in order to reduce the baseline habitat value and thus the amount of compensation required. To address this, if a habitat has been cleared, destroyed or degraded previously, the landowner/developer should use the pre-degradation habitat type as the site's baseline. For woodland there is an additional protection, if woodland has been felled within a site and compensation is required for the loss, it must be recorded as 'woodland and forest: felled' in the baseline, a habitat with high distinctiveness and good condition and compensated for as if the baseline habitat was a high distinctiveness woodland.

A modelling assessment of how many units are delivered by woodland relative to all other habitat types

To assess if BNG incentivises forest planting and forest restoration, first, all possible land conversions under the BNG scheme were modelled using the trading rules and multipliers from the official BNG calculator and handbook. To this end, two types of possible actions were considered: enhancement of existing woodland and forest, as well as creation of new woodland and forests on other current land cover types. For all

considered conversions, the strategic significance multiplier, which refers to locations and actions relevant to the LNRS, is set to 1, meaning the location is not within the LNRS network.

We first look at raw units, that is where the pre-development baseline has not been subtracted, instead only the average units that the creation or enhancement of the woodland habitat generates from all possible baselines is calculated based on the habitat's distinctiveness, an assumption of good condition, a strategic significance of 1 (i.e. not within the LNRS network), the relevant difficulty and temporal multipliers for creation or enhancement to good condition, and a spatial multiplier of 1 (i.e. on site). We find that woodland enhancement produces more raw units than woodland creation (Figure 2). This is likely to be true for all habitat types as the metric calculation only applies risk multipliers to the post-intervention units beyond the baseline (i.e. the units stemming from enhancement, as opposed to those that were already there, see discussion for Equation S1. The creation and enhancement of higher distinctiveness woodlands does not consistently result in more raw units per hectare than medium distinctiveness woodland due to the higher difficulty of creation and enhancement and longer time to target condition (Table 1). From the relative rankings of conversions to woodland, we can see that woodland creation and enhancement produces relatively fewer raw units than the creation and enhancement of other habitat types. This will be exacerbated by woodlands' long maturation time, which means many woodland types cannot meet the 'good' condition assumed in this modelling and thus will produce even fewer units than predicted within typical 30-year BNG agreements.

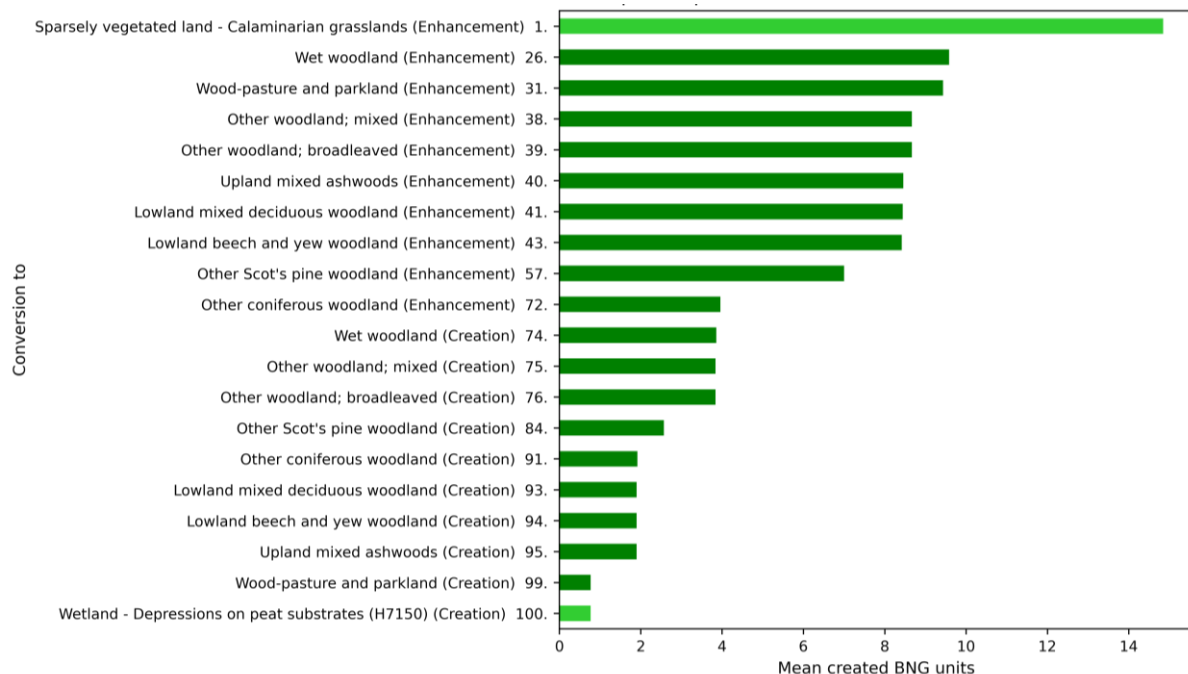


Figure 2: Mean 'raw' post-intervention BNG units per hectare from habitat from creating or enhancing woodland of different types to good condition from all possible 'poor' condition baseline habitats, numbers next to habitat types give the rank of that habitat conversion relative to all others. To calculate 'raw' unit, the pre-development baseline has not been subtracted, instead only the average units that the creation or enhancement of the woodland habitat generates is calculated based on the habitat's distinctiveness, an assumption of good condition, a strategic significance of 1 (i.e. not within the LNRS network), the relevant difficulty and temporal multipliers for creation or

enhancement to good condition, and a spatial multiplier of 1 (i.e. on site). The first and last bars in the plot show the lowest and highest scoring land cover type when considering all possible broad habitats, not only Woodlands and forests. Note: due to the timescales of woodland creation and enhancement, some of these outcomes are not possible in 30 years and would require custom longer agreements.

Figure 3 shows an analysis of the BNG units that can be achieved through woodland and forest enhancement, meaning conversions between woodland types and enhancements to a higher condition. For all conversions, a moderate condition is assumed for the baseline and a good condition for the established habitat. It is notable that the number of units is substantially lower than the ‘raw’ units that would be achieved (Figure 2) as the woodland habitats being enhanced tend to have a high unit baseline.

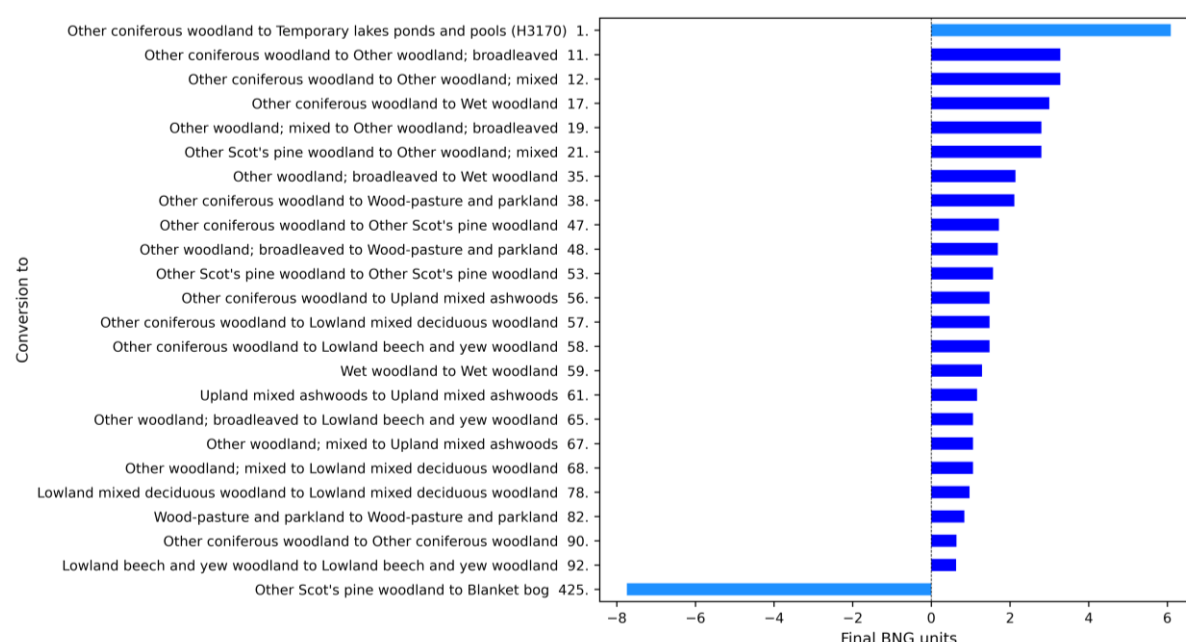


Figure 3: BNG units resulting from the enhancement of existing woodland and forest. For each conversion, the starting and ending habitat are given, alongside the rank of that conversion relative to all others involving woodland. The first and last bars show the highest-scoring and lowest-scoring conversion options including woodlands and forests. For all conversions, a medium condition is assumed for the baseline and a good condition for the established habitat.

Figure 4 shows the net units achieved by creating good condition woodland on two of the most common baseline habitats, poor condition cereal crops (Figure 4a) and medium condition modified grassland (Figure 4b). This has significant implications for woodland creation as woodland creation often results in a net loss of units under BNG, meaning it is unlikely to be chosen as a compensation approach where trading rule requirements can be satisfied through woodland enhancement or the creation of other broad habitat types.

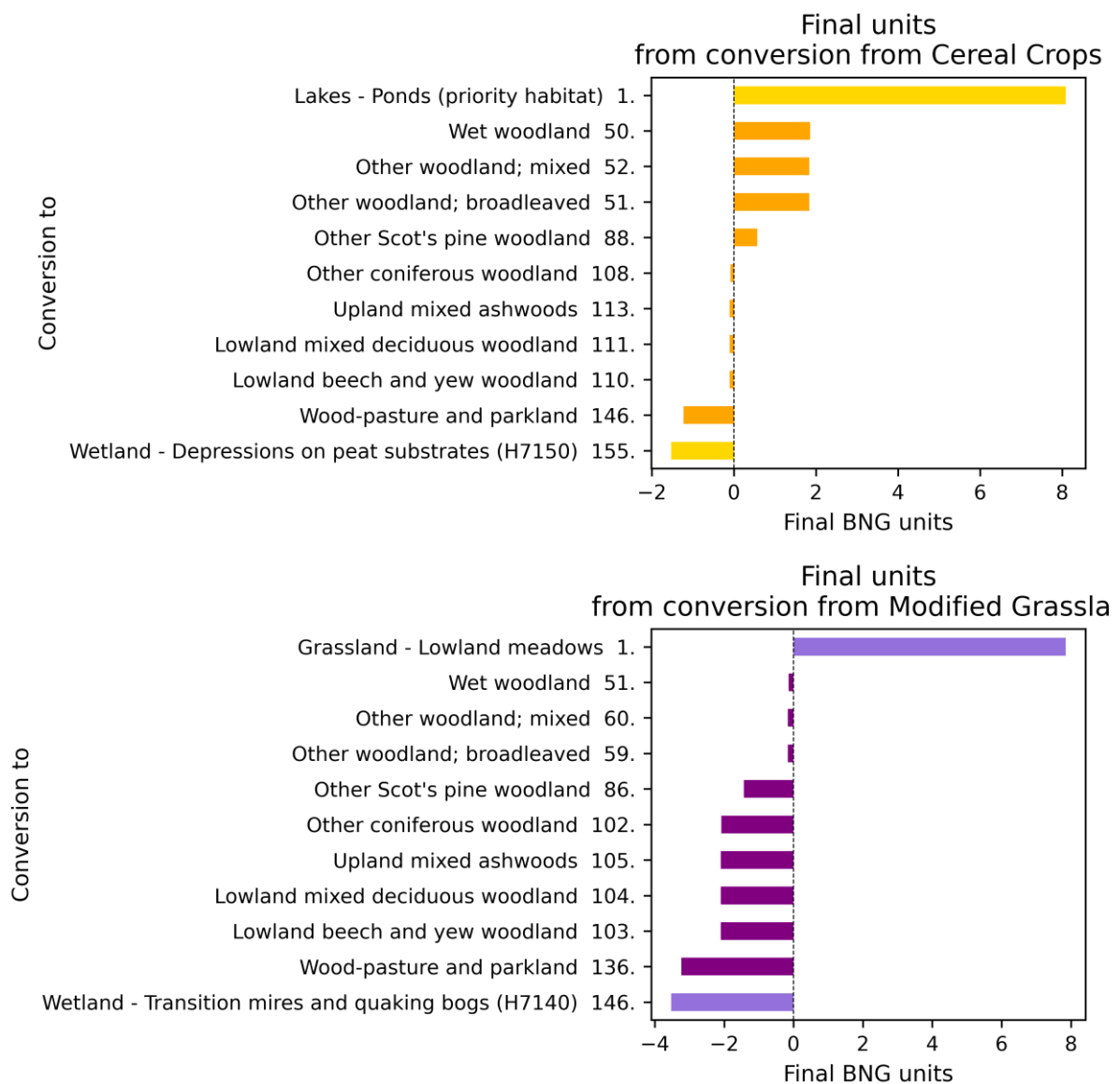


Figure 4: Net BNG units from creation of Woodland and Forest on existing Cereal cropland and Modified grassland. The first and last bars indicate the highest and lowest scoring possible conversions for cereal crops and modified grassland. The numbers show the ranking within all possible conversions on cereal crops and modified grassland, respectively.

An up-to-date review of how much woodland is currently being delivered on the BNG register

To assess the amount of woodland currently planned for delivery on the BNG register, we analysed woodland delivery within the first 84 off-site BNG habitat banks, registered between February 2024 and June 2025. The data was taken from the Biodiversity Gain Site Register (hereafter referred to as the 'off-site register') was converted into a CSV and then analysed in R. This data covers 84 offset projects covering 2818.68 hectares, with 1686 baseline parcels and 1593 post-intervention parcels. The results of this analysis are shown in Figure 5. A total of 380.09ha of woodland is listed on the off-site register, of which over 80% consists of three habitat types, "other woodland; broadleaved" (118.47ha), "lowland mixed deciduous woodland" (109.18ha), and "wood

pasture and parkland” (86.35ha). A breakdown of all woodland available on the off-site register is given in Table S1. The majority of the area of promised woodland on the BNG register is from enhancement of existing woodland as opposed to creation of new woodland area and thus does not increase overall woodland cover. There have not yet been any commitments on the gain site register to deliver lowland beech and yew woodland, native pine woodlands, other Scot’s pine woodland, upland birchwoods, upland mixed ashwoods, or upland oakwood. Currently planned woodland area makes up 13.48% of the planned area on the biodiversity gain site register, with the remaining habitats being other broad habitat types, predominantly grassland. In addition, there are commitments to deliver 73.5km of hedgerow enhancement and creation, see Figure 5b for a breakdown.

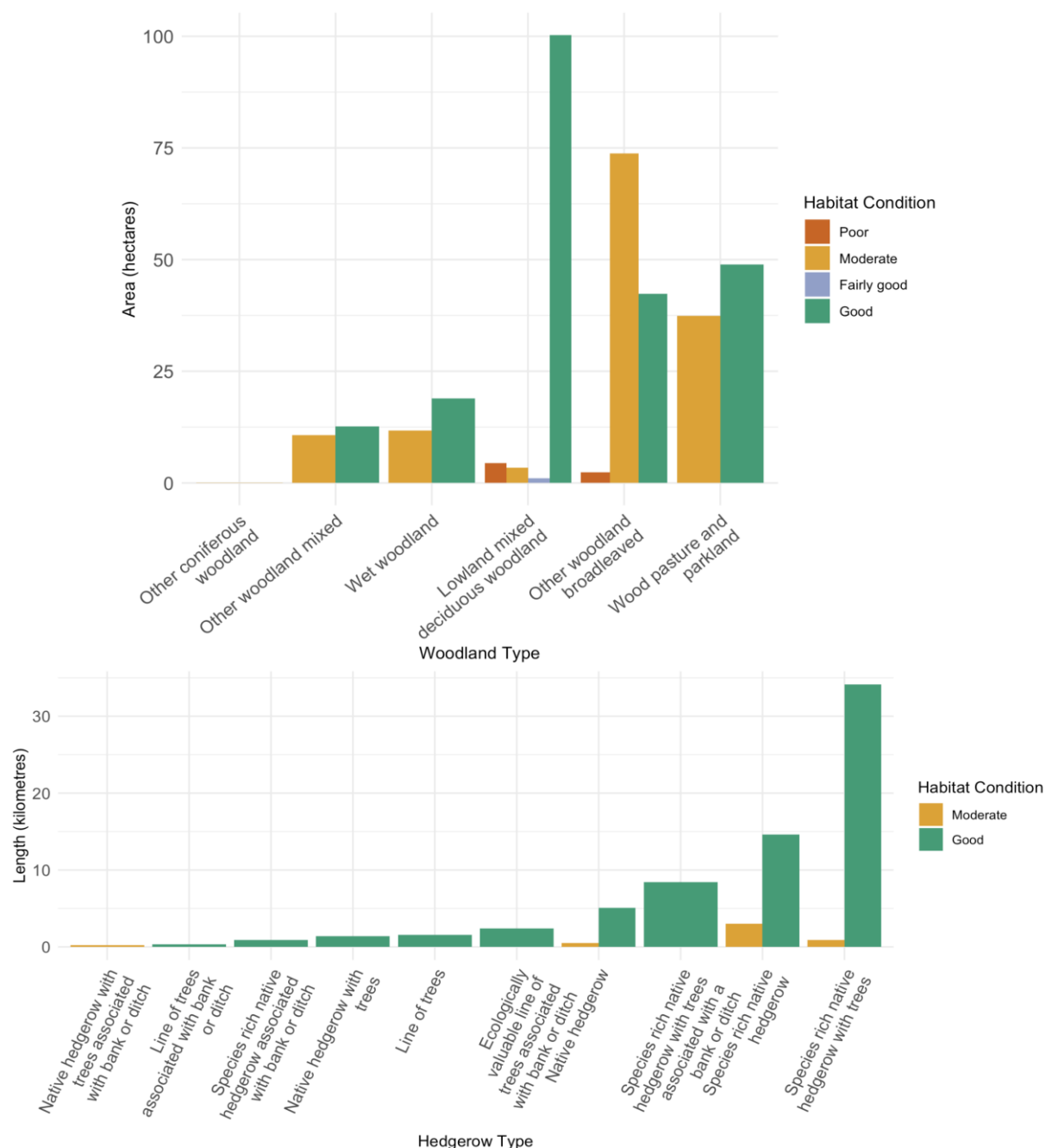


Figure 5: Amount of (a) woodland and (b) hedgerow habitat listed on the Biodiversity Gain Site Register as of June 2025, split by specific habitat type and condition.

Demand for woodland units

To assess demand for offsite woodland habitat, we analysed all unit sales between February 2024 and June 2025 and found that, so far, there has been very limited sales of woodland units on the market. There were 12 woodland transactions during this period, accounting for a total of 3.18ha, 0.8% of the total area of planned woodland habitat registered on the off-site register. The transactions were as follows:

- 2.1ha of lowland mixed deciduous woodland, consisting of 4 transactions to developments in Stockport LPA, Worthing LPA, Dacorum LPA and to Bristol City LPA
- 0.4ha of other woodland broadleaved, consisting of 4 transactions to developments in Blackburn with Darwen LPA, Havant LPA, Salford LPA, and Rother LPA
- 0.09ha of other woodland mixed, consisting of 1 transaction to development in South Cambridgeshire LPA
- 0.59ha of rural trees, consisting of 3 transactions to developments in Windsor and Maidenhead LPA, Bath and North East Somerset LPA, South Oxfordshire LPA.
- Additionally, 2.19 units of hedgerow have been sold, with a total length of 0.69km

Information on off-site sales cannot be taken as a proxy for the woodland lost to development as the majority of compensation is provided through the creation and enhancement of habitats on-site (BNG500 2025; Rampling et al. 2023). Between 2017-18 and 2021-2022 an average of 355ha of woodland loss per year was attributable to development (Forestry Commission 2024). If this trend has continued, it would require a substantial amount of land for compensation. To demonstrate this, we use the Excel Statutory Metric Calculator Tool to calculate the compensation requirements for the loss of 1ha of moderate condition lowland mixed deciduous woodland (12 units) and provide two examples of the area of habitat creation or enhancement needed to meet trading rule requirements for that habitat (no net loss of units of lowland mixed deciduous woodland):

- 1) Creation of almost 10ha of fairly poor condition lowland mixed deciduous woodland from a cereal crop baseline. If done alone, this would result in a net unit change of -19.81 (-61.91%) and thus would have to be combined with other habitat creation such as other neutral grassland to satisfy trading rules overall. Created woodland of this type is limited to a maximum of fairly poor condition as moderate condition or higher is dependent on the presence of 1 of more veteran trees per hectare. In the eventuality there were appropriate veteran trees within the cropland, good condition could potentially be reached, but this would still require almost 7ha of compensatory woodland creation.
- 2) Enhancement of almost 9ha of poor condition other woodland; broadleaved to good condition lowland mixed deciduous woodland. This would only be possible where the factor limiting the condition of the baseline woodland is something that can be realistically fixed in 30 years. Where the limiting factor is something that takes more time to develop, such as the age structure of trees, the enhanced woodland may be limited to moderate condition, which would require

almost 15ha to be enhanced, or poor condition, which would require almost 26ha of enhancement.

Combined with the high price of woodland units, which ranged from £30,500 to £57,125 in October 2024, depending on habitat type and location (Arbtech 2024), this is likely to incentivise avoidance of damage to woodland habitats, if not their creation. This is a current strength of BNG's approach, with the penalties in the metric promoting adherence to the mitigation hierarchy and avoiding impacts on habitats which cannot be replaced within appropriate timescales.

Recommendations on how BNG's operation might be improved

Review of BNG metric scoring to improve relative scoring of habitats currently disadvantaged

To some extent, there is an inherent conflict between the ease and simplicity of use of a metric and its ecological comprehensiveness. The substantial risk multipliers for woodland habitats that 'disadvantage' its creation also incentivise avoidance, which is essential as it will take a substantial amount of time for new woodlands to reach maturation and therefore the ecological condition and complexity of existing woodlands. This makes it difficult to suggest ways to increase incentives to create woodland without substantially increasing the metric complexity. However, there are changes to the application of the metric that may improve the treatment of woodland within BNG:

- Ensuring condition assessment captures all valuable aspects of woodland (see e.g., Falk 2021);
- Ensuring strict trading rules are maintained for woodland to ensure the incentive for avoidance is maintained; and
- Potentially loosening difficulty risk multipliers where a habitat bank can demonstrate a robust plan for woodland delivery, supported by a competent ecologist and the right enabling conditions for the habitat creation. Caution should be taken if this were to be extended to developer-led habitat creation as it may reduce the incentive for avoidance.

In addition, we would strongly recommend against the current proposals to simplify the small site metric (SSM) and expand its use to medium developments and sites containing protected and priority features. This could very easily result in the misidentification or 'lumping' of species-rich woodland types, leading to the loss of priority habitats that are highly difficult to replace. Further, the proposed relaxation of the trading rules for the SSM would likely result in woodland loss being compensated for through other, easier to create habitats, with substantial negative implications for woodland cover in this country.

Details of protected sites impacted

Due to the lack of accessible spatial data available pertaining to BNG, we do not currently know the extent of impact it has had on protected sites, both in terms of habitat loss and creation and/or enhancement. It is currently clearly stated in guidance and regulation that BNG should not supersede or reduce existing protection of sites or

habitats (Biodiversity metric Principle 2: Defra 2024b, 19). Work to fulfil existing habitat creation and enhancement requirements for protected sites and species, such as suitable alternative natural green space and mitigation or compensation to a special area of conservation, special protection area, or protected species can count towards BNG up to 100% of the baseline unit value, but the additional 10% must not come from these sources (Defra 2024a). Current guidance states that landowners may be able to enhance non-designated features on protected sites and sell the resultant units for BNG, provided this does not adversely affect any designated features and consent is received from Natural England before the work is started (Defra 2023).

Details of exceptional circumstances and compensation strategies deployed

Rule 4 of applying the metric states that, in exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority. This may be done through relaxing trading rules or reducing the time to target condition in the metric when a development presents a unique opportunity for restoring historically important habitat, complex landscape-scale changes, or if the site has exceptional existing abiotic conditions for a specific habitat. We have been unable to find any details on any cases where this has occurred, nor the compensation strategies deployed. This is due to the lack of centralised and accessible planning application data.

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Supplementary materials

Table S1: Planned area of woodland types within the first 84 habitat banks registered on the Biodiversity Gain Offsite Register.

Woodland Type	Planned Area (ha)
Other woodland; broadleaved	118.47
Lowland mixed deciduous woodland	109.18
Wood pasture and parkland	86.35
Wet woodland	30.59
Other woodland; mixed	23.31
Rural tree	11.94
Urban tree	0.20
Other coniferous woodland	0.05
Total	380.09

Equation S1: Calculation of units resulting from enhancement within the Statutory Metric calculation tool.

If baseline condition > post intervention condition

$$(((\text{area} \times \text{post intervention distinctiveness} \times \text{post intervention condition}) - (\text{area} \times \text{baseline distinctiveness} \times \text{post intervention condition})) \times (\text{difficulty} \times \text{time})) + (\text{area} \times \text{baseline distinctiveness} \times \text{post intervention condition}) \times (\text{strategic significance})$$

Else

$$(((\text{area} \times \text{post intervention distinctiveness} \times \text{post intervention condition}) - (\text{area} \times \text{baseline distinctiveness} \times \text{baseline condition})) \times (\text{difficulty} \times \text{time})) + (\text{area} \times \text{baseline distinctiveness} \times \text{baseline condition}) \times (\text{strategic significance})$$

Broadly, this can be re-written as:

$$(((\text{post intervention units} - \text{baseline units}^*) \times \text{risk multipliers}) + \text{baseline units}^*) \times \text{strategic significance}$$

i.e. The metric calculation only applies the risk multipliers to the new units, assumes the habitat will certainly remain at least as good as it was.

*If post intervention condition is lower than the baseline condition, the metric only guarantees baseline units up to the new post-intervention condition.