



More than 10% Biodiversity Net Gain for the Local Plan for the Broads Topic Paper

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1: Introduction

Biodiversity Net Gain (BNG) became mandatory for large schemes from 12 February 2024 and for smaller schemes, from 2 April 2024. The level of mandatory net gain is at least 10%. This Topic Paper explores justification for considering a BNG level of greater than 10% for the Local Plan for the Broads.

2: Local justification for recommending minimum Biodiversity Net Gain greater than 10%

2.1 Evidence from national Cost/Benefit Analysis.

Within the evidence presented by Defra consulting on the introduction of Biodiversity Net Gain into the planning system (December 2018-February 2019), it was made clear that an increase of 10% would be the absolute minimum necessary to ensure confidence that a net loss in biodiversity would be avoided, and that any gain would actually be realised as an outcome of a development-related biodiversity 'enhancement' project.

Relevant findings from Defra's Impact Assessment document¹ (21/11/2018) include (our emphases):

- “..In simple terms, [10%] is the lowest level of net gain that [Defra] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.”
- “..Advice from some Natural Capital Committee members suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses.”
- “..The department therefore favours as high a level of net gain as is feasible... The analysis undertaken in this Impact Assessment indicates that the level of requirement makes relatively little difference to the costs of mitigating and compensating for impacts.”

The level of requirement for BNG (be it 10% or more) makes relatively little difference to the costs of mitigating and compensating for impacts.

2.2 Evidence from Broads Biodiversity Audit 2011²

The project aims were as follows:

1. To quantify the national biodiversity importance of the Broads.

¹ See; Biodiversity Net Gain Consultation Impact Assessment, Defra 2018 [181121 Biodiversity Net Gain Consultation IA FINAL for publication.pdf \(defra.gov.uk\)](#)

² [Broads Biodiversity Audit Report \(broads-authority.gov.uk\)](#)

2. To quantify the relative numbers of priority species within different Broads habitat assemblages.
3. To understand the spatial distribution of these priorities.
4. To develop methodology and framework providing evidence for the spatial distribution, tolerance and sensitivity of priority species to saline incursion and flooding.
5. To apply this methodology to map tolerance and sensitivity of priority species to saline incursion and flooding throughout The Broads Executive Area and the wider area of The Broads Biodiversity Action Plan.

The Broads Biodiversity Audit 2011 concludes that the Broads is very important for biodiversity, with records (pooling pre- and post-1988) comprising:

- 11,067 species in total
- Nineteen Global Red Data Book (GRDB) species
- 1,519 priority species (GRDB, Red Data Books (RDB), Nationally Notable, Birds of Conservation Concern, BAP, regional specialties)
- 19% of total designated species in the United Kingdom (based on the JNCC only), occurring in an area only 0.4% of the United Kingdom
- 26% of the UK's BAP species, 13% of the UK's RDB, 17% of Notable and Scarce
- A very wide range of taxonomic groups: e.g. 403 species of beetle, 251 species of flies (Diptera) and 179 species of moth
- Very large numbers of priority bird species – 85% and 94% respectively of UK Bird: Red and Bird: Amber designated species
- 66 Broads Speciality species, 14 species entirely and 17 largely restricted to The Broads in the UK and 35 that have a primary stronghold in the region.
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The majority (77%) of designated species recorded in the Broads are RDB or Notable (these include species designated as GRDB, RDB, Notable, Rare/Scarce).

2.3 Global Red Data Book species

The 19 Global Red Data Book³ species occurring in the Broads included six species of birds (although two species are vagrants to the area), four species of mollusc, the White-clawed Crayfish, *Austropotamobius pallipes* (GRB:EN, BAP) and a Hairy Fungus beetle, *Pseudotriphyllus suturalis*, a recent addition to the IUCN Red Data Book. The Medicinal Leech *Hirudo medicinalis* (GRDB:NT, BAP) is also listed, but was last recorded in 1981.

Only one Marine: Near Scarce species was recorded in the Broads, the Tentacled Lagoon Worm *Alkmaria romijni* (M:NS). This annelid has been recorded at a number of scattered southern locations from the Humber to Pembrokeshire, inhabiting lagoons and sheltered estuaries, and was found in Breydon Water, near Reedham Marshes. Although the last

³ Red data book is the document established by IUCN for documenting the rare and endangered species of plants, animals, fungi and also a few local species that exist within a state or country.

record was in 1987, marine and estuarine species are under-recorded, and it may still be present in the area.

There are 19 Global Red Data Book species occurring in the Broads.

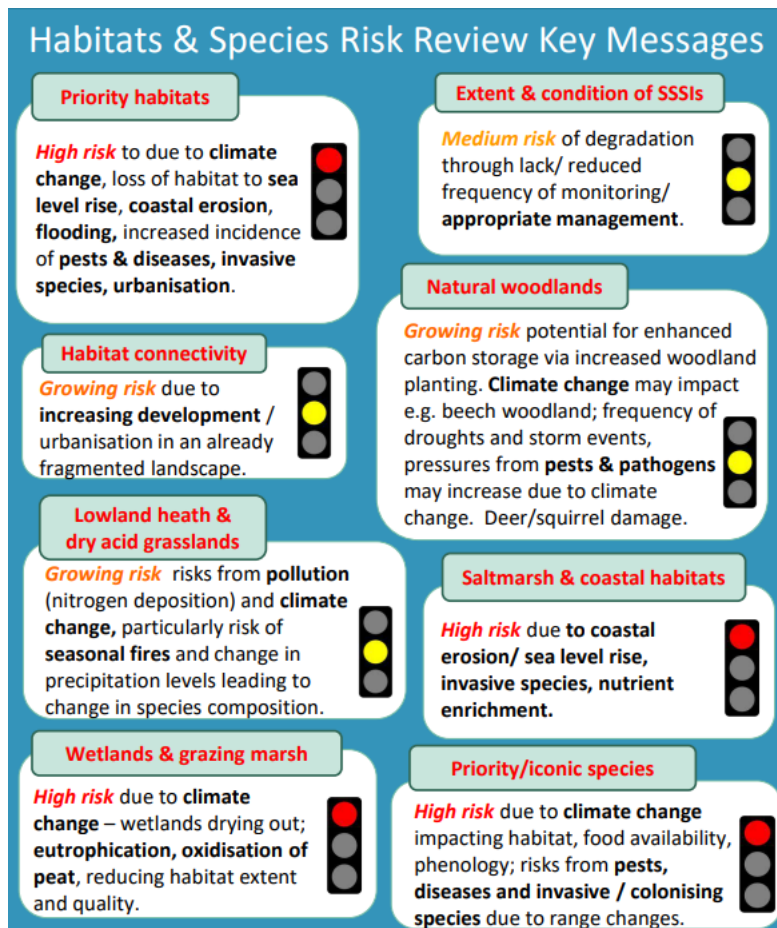
2.4 Evidence from Natural Capital Compendium⁴

The purpose of this Evidence Compendium was to present information about Natural Capital assets in Norfolk and Suffolk and the potential risks to them, to provide an element of the preparatory work that will feed into a Norfolk & Suffolk 25 Year Environment Plan. There is a section in the about risks to Habitats & Species, copied below, with some infographics about the key messages on the Habitats & Species risk review which is also available below. In addition to the Habitats & Species risk review, there are also sections about Risks to Freshwater, Risks to Coast & Marine, and Risks to Atmosphere.

Risks to habitats and species are well documented and include habitat loss, fragmentation and loss of habitat quality resulting from pressures including climate change, land use change, intensive agriculture, nutrient enrichment, pollution, disturbance, pests & diseases and invasive species. The creation of a 'Nature Recovery Network' to provide a 'resilient and coherent ecological network' forms part of the government's 25 Year Environment Plan (DEFRA, 2018) and response to these pressures. This aims to provide an additional 500,000 hectares of wildlife habitat, more effectively linking current protected sites and landscapes, urban green spaces and waterways. Guidance for the development of Nature Recovery Networks has been published by Natural England (Crick et al., 2020). This will be facilitated through the planning system and delivered locally by a partnership of organisations and landowners supported by the new Environmental Land Management Scheme.

As a result of the reviews carried out in the Norfolk and Suffolk Natural Capital compendium, seven priority areas were defined for consideration in the development of the Norfolk and Suffolk 25-year environment plan, which include Priority E "Develop policy & programmes for partnership working **to increase species richness, abundance and ecological resilience** by managing existing habitats, improving habitat connectivity and enabling habitat & species migration".

⁴ Natural Capital Evidence Compendium for Norfolk and Suffolk October 2020 [PowerPoint Presentation \(norfolkbiodiversity.org\)](https://www.norfolkbiodiversity.org)



Priority E of the Natural Capital Compendium says “Develop policy & programmes for partnership working to increase species richness, abundance and ecological resilience by managing existing habitats, improving habitat connectivity and enabling habitat & species migration”.

2.5 Biodiversity Emergency/crisis

The Broads Authority are potentially likely to declare a biodiversity emergency/crisis. It is envisaged that a paper will go to Broads Authority meeting in November 2024. This section will be updated as a result of that meeting.

The BA may declare a biodiversity emergency/crisis.

2.6 Broads Plan⁵

The Broads Plan is the single most important strategy for the Broads National Park, setting out a long-term vision and strategic objectives to benefit its landscape, environment, local communities and visitors. As a high-level overarching plan, it draws together and guides a wide range of plans, programmes and policies relevant to the area. The Broads Plan is reviewed and updated on a regular basis, and this Plan covers the period 2022 to 2027.

⁵ [Broads Plan 2022 - 2027 \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/broads-plan-2022-2027)

Part of the vision for the Broads Plan says 'Biodiversity is at the heart of nature recovery. Our natural environment and the beneficial goods, services and cultural values it provides from food and energy to landscape character and recreation are in good condition, used fairly and sustainably, and valued by society. In particular, the precious nature of plentiful, clean, fresh water as a fundamental resource is understood and respected by all'.

One of the themes is Theme B: Improving landscapes for biodiversity and agriculture. There are 'sub themes' which are:

- B1** - Restore, maintain and enhance lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques
- B2** - Promote best practice water capture and usage across the Broadland Rivers Catchment and reduce point and diffuse pollution into the floodplain and water courses
- B3** - Seek biodiversity net gain and enhance areas of fen, reed bed, grazing marsh and wet woodland, to protect peatlands as carbon sinks
- B4** - Define, implement and monitor management regimes for priority species and invasive non-native species
- B5** - Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to the National Biodiversity Network

The recovery and enhancement of biodiversity is seen as critically important to the Broads Authority and its partners.

2.7 Broads Authority Purposes

The Broads Authority is a Special Statutory Authority established under the [Norfolk and Suffolk Broads Act 1988](#)⁶. It has a statutory duty to manage the Broads for three purposes, none of which takes precedence:

- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
- Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
- Protecting the interests of navigation.

Additionally, in discharging its functions, the Broads Authority must have regard to:

- The national importance of the Broads as an area of natural beauty and one which affords opportunities for open-air recreation;
- The desirability of protecting the natural resources of the Broads from damage; and
- The needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.

Conserving and enhancing biodiversity is one of the purposes of the Broads Authority.

⁶ [Broads Authority Act 2009](#) is also of importance.

2.8 Biodiversity in the Broads

The Broads is one of Europe's finest and most important wetlands, with a rich mosaic of habitats comprising, among other things, shallow lakes, rivers, fens, drained marshland, wet woodland, estuary saltmarshes, intertidal mudflats and coastal dunes. Twenty-eight sites covering a total of more than 7200 hectares are nationally designated as Sites of Special Scientific Interest (SSSIs), a third of which are also National Nature Reserves, and there are numerous County Wildlife Sites within and near the Broads boundary. Most of the SSSIs are of international importance for their habitats and wildlife as the Broads Special Area of Conservation (SAC) and the Broadland Special Protection Area (SPA), and an area of the wetland is also designated as a Wetland of International Importance under the Ramsar Convention.

The Broads is a UK priority wetland area, with the largest expanse of species-rich peat fen in lowland Britain. Most of its fen sites are designated for nature conservation, with around 40% owned or managed by conservation organisations.

The Broads has the most extensive tract of wild wet woodland within Eastern England. It is of international significance and where not designated may, like other habitats located on peat soils, be at risk from drainage and from loss due to development. Natural regeneration of wild wet woodland in suitable low-quality habitats can support nature recovery.

Grazing marsh covers around half of the Broads. Some areas attract large and internationally important numbers of breeding and non-breeding birds, and there is a substantial area of internationally important dyke communities. The marshes provide a third of East Anglia's cattle grazing land, and local farmers and graziers rely on environmental land management support to optimise profit and protect the habitats.

There are more than 11,000 recorded species in the Broads, including 26% of all UK BAP₁₄ priority species and 17% of all nationally notable or scarce species. Sixty-six species are either restricted entirely to the Broads or rarely seen elsewhere in Britain. Iconic species include the Bittern, Marsh Harrier, Otter, Fen Orchid, Norfolk Hawker Dragonfly and the entire UK populations of the Swallowtail Butterfly, Dotted Footman Moth and Holly-Leaved Naiad.

The long-term aim for the Broads Plan is: Biodiversity is thriving in the Broads, which remains a globally important wetland adapting to climate change. Sustainable land and water management practices support well-functioning ecosystems to provide multiple public goods including food, clean and plentiful water, carbon storage, abundant wildlife, landscape character, and recreation and tourism. The challenging targets to improve water quality, water supply and flood protection are being met. Opportunities are taken to establish more, bigger, better and more joined up ecological networks, and priority species and their habitat needs are well understood and well managed to halt and reverse

biodiversity decline and loss, increase resilience and adaptive ability, and pursue environmental net gain. Invasive non-native species are under control and eradicated where possible. A profitable agriculture sector provides good food while maintaining or restoring habitats to good ecological condition. Robust evidence and monitoring guide good decision making in all aspects of natural resource management.

The Broads Authority Executive Area is clearly of great importance to habitats and species, including those that are visitors.

2.9 Special Qualities of the Broads

Over the years, the Authority has asked people to identify the special qualities or features of the Broads they value most. Common responses include:

- The winding rivers and open water bodies – the ‘broads’
- The variety of habitats
- The abundance and rich diversity of wildlife
- Navigable, lock-free waterways to explore and enjoy
- The variety of patterns and textures in the landscape
- Countryside access to both land and water
- ‘Big sky’ views, dark skies and a sense of remoteness, tranquillity and wildness
- The people, the visitors, the activities
- The history and historic environment: Earth heritage, heritage assets, archaeology
- Boating, boatbuilding and unique heritage fleets
- Cultural assets, skills and traditions such as thatching and millwrighting
- People’s interactions with the landscape
- Waterside settlements and quiet villages

The special qualities of the Broads include the variety of habitats and diversity of wildlife.

2.10 DEFRA Outcomes Framework

To support Protected Landscapes in meeting their huge potential for nature, climate, people and place, Government has established targets for National Parks and National Landscapes with the Outcomes Framework which as published in January 2024⁷. These targets promote the actions that are most needed to achieve positive changes. They set the ambition for how we expect Protected Landscapes to achieve 3 outcomes from our Environmental Improvement Plan (EIP) 2023:

- Goal 1: Thriving plants and wildlife
- Goal 7: Mitigating and adapting to climate change
- Goal 10: Enhancing beauty, heritage and engagement with the natural environment

⁷ [Protected Landscapes Targets and Outcomes Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/protected-landscapes-targets-and-outcomes-framework)

Thriving plants and wildlife targets are set to motivate more activity on the components needed to ensure wildlife can thrive.

Protected Landscape bodies and partners should seek to increase the amount of land in favourable management in Protected Landscapes through meeting the targets below and other available means. This will maximise the contribution that Protected Landscapes can make towards our national targets for nature recovery.

- Target 1 - Restore or create more than 250,000 hectares of a range of wildlife-rich habitats within Protected Landscapes, outside protected sites by 2042 (from a 2022 baseline).
- Target 2 - Bring 80% of SSSIs within Protected Landscapes into favourable condition by 2042.
- Target 3 - For 60% of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition by 31 January 2028.
- Target 4 - Continuing favourable management of all existing priority habitat already in favourable condition outside of SSSIs (from a 2022 baseline) and increasing to include all newly restored or created habitat through agri-environment schemes by 2042.
- Target 5 - Ensuring at least 65% to 80% of land managers adopt nature friendly farming on at least 10% to 15% of their land by 2030.

The thriving plants and wildlife targets set by Government demonstrate the great importance to habitats and species in the Broads Authority Executive Area and the great potential the area has to benefitting wildlife.

2.11 Campaign for National Parks Health Check Report on National Parks

[National Parks Health Check Report - Campaign for National Parks \(cnp.org.uk\)](https://cnp.org.uk) was completed in 2024. This report sets out the first full assessment of how well the National Parks of England and Wales are supporting nature recovery. It provides evidence of the current situation and identifies the changes needed to policy, legislation and practice in order to secure the step-change in progress that is so urgently needed.

National Parks also have a critical role to play in delivering national level targets for restoring certain habitats and in achieving targets to halt and reverse the declines in the abundance of species in both England and Wales.

Put simply, making National Parks better is fundamental to tackling species extinction and biodiversity loss.

National Parks and The Broads have a critical role to play in delivering national level targets for restoring certain habitats and in achieving targets to halt and reverse the declines in the abundance of species.

2.12 Pressures on land use

Within Norfolk, there are **pressures on land use**, the biggest being significant and unprecedented levels of growth. The population of the Norfolk is projected to increase from 916,120 in 2021 to 1,029,249 by 2043⁸, an increase of around 11%. In addition to these homes is the infrastructure needed to support this – transport, education, health and social care, utilities and community facilities. This all requires space (land) and resources.

The continuous growth in development and urbanisation means the county now has a **highly fragmented landscape** with small pockets of habitat supporting rare and vulnerable species. The Lawton Report “Making Space for Nature”⁹ has emphasised the importance of networks and connectivity for biodiversity. Fragmentation impairs species movement and migration, meaning these isolated populations are less able to survive or adapt to changing climate conditions and are put at further risk.

Pressures on land use and fragments landscapes are affecting wildlife.

2.13 A changing climate

The changing climate puts wildlife at further risk¹⁰; for example, with warming of 2°C, 72% of bumblebees in Norfolk could be lost, along with 75% of grasshoppers and bush crickets, and 68% of larger moths. The new climate, at this level of warming, potentially becomes unsuitable for 15 species of birds 7 species of mammal. The Swallowtail Butterfly, found in the UK only in the Norfolk Broads, and Red Admirals are among 11 species of butterfly which could be affected¹¹.

The changing climate puts wildlife at further risk.

2.14 Summary of the local justification section

- a) The level of requirement for BNG (be it 10% or more) makes relatively little difference to the costs of mitigating and compensating for impacts.
- b) The majority (77%) of designated species recorded in the Broads are RDB or Notable (these include species designated as GRDB, RDB, Notable, Rare/Scarce).
- c) There are 19 Global Red Data Book species occurring in the Broads.
- d) Priority E of the Natural Capital Compendium says, “Develop policy & programmes for partnership working to increase species richness, abundance and ecological resilience by

⁸ [Population - UTLA | Norfolk | Report Builder for ArcGIS \(norfolkinsight.org.uk\)](#)

⁹ Lawton, et al. (2010) Making Space for Nature: A review of England’s Wildlife Sites and Ecological Network. Report to DEFRA.

¹⁰ Price, J. 2017. Trans. Norfolk Norwich Nat. Soc. 2017 50 (1)

¹¹ [Norfolk’s iconic Swallowtail Butterfly at risk from climate change - Tyndall Centre for Climate Change Research](#)

managing existing habitats, improving habitat connectivity and enabling habitat & species migration”.

- e) The BA may declare a biodiversity emergency/crisis.
- f) The recovery and enhancement of biodiversity is seen as critically important to the Broads Authority and its partners.
- g) Conserving and enhancing biodiversity is one of the purposes of the Broads Authority.
- h) The Broads Authority Executive Area is clearly of great importance to habitats and species, including those that are visitors.
- i) The special qualities of the Broads include the variety of habitats and diversity of wildlife.
- j) The thriving plants and wildlife targets set by Government demonstrate the great importance to habitats and species in the Broads Authority Executive Area and the great potential the area has to benefitting wildlife.
- k) National Parks and The Broads have a critical role to play in delivering national level targets for restoring certain habitats and in achieving targets to halt and reverse the declines in the abundance of species.
- l) Pressures on land use and fragments landscapes are affecting wildlife.
- m) The changing climate puts wildlife at further risk.

3: Viability evidence

A viability study has been produced to support the Local Plan for the Broads update. At the time of producing this note, it was being finalised, but the consultants assessed 20% BNG and have concluded this is viable.

The viability testing has used a 20% BNG contribution throughout For brownfield development, including a service charge, this represents a cost of £304 per dwelling and for development on a greenfield site, £1,272. For a 10% contribution, costs will be 19% lower (at £255 and £1,069 respectively). Costs are taken from the government’s impact assessment – Biodiversity net gain and local nature recovery strategies (using the Central estimates for the East region) plus a 5% service charge. The extra costs of moving from a 10% to a 20% contribution for a brownfield site is £49 per dwelling which is minimal in terms of the total development costs for a new home.

Viability evidence indicates that 20% BNG policy requirement is viable.

4: Next Steps

The Local Plan will be amended to refer to 20% BNG with a summary of the justification and viability study conclusions included. We will ask a specific question to ascertain thoughts on the proposed 20% level and this will be discussed through the examination into the Local Plan. Please note that the Authority cannot require 20% until the Local Plan is adopted.