Planning Committee

07 February 2025
Agenda item number 11

Local Plan – Preparing the publication version

Report by Planning Policy Officer

Summary

This report sets out the updated Local Development Scheme. It also introduces some updated evidence that will support the next version of the Local Plan. These are the Peat Topic Paper and the amended Biodiversity Net Gain (BNG) Topic Paper.

Recommendation

It is recommended that members endorse:

i. The Local Development Scheme.

ii. The Peat Topic Paper and BNG Topic Paper as evidence to support the Local Plan.

1. Introduction

1.1. This report sets out the updated Local Development Scheme. It also introduces some updated evidence that will support the next version of the Local Plan. These are the Affordable Housing Topic Paper, Peat Topic Paper and the amended Biodiversity Net Gain (BNG) Topic Paper.

2. Local Development Scheme

2.1. The Local Development Schene (LDS) is the timeline for producing the Local Plan. On release of the NPPF, the Government has requested that all Local Planning Authorities (LPAs) update their LDS. The updated LDS is at Appendix 1. The updated LDS reflects the transition arrangements to the new local plan system published in December 2024 – the deadline to submit under the current local plan system is December 2026 (rather than June 2025 which was our working assumption).

3. Peat Topic Paper

3.1. Members will be aware of the proposed strengthening of the currently adopted peat policy in the emerging Local Plan, that seeks to keep peat in situ unless there are exceptional circumstances. The Peat Topic Paper seeks to emphasise the importance of peat and to justify this proposed policy approach. See Appendix 2.

4. BNG Topic Paper - amended

4.1. Members recently endorsed the BNG Topic Paper that sought to justify 20% BNG rather than the statutory 10% BNG. Some amendments are proposed to strengthen the justification for this approach. See Appendix 3. The declaration of a biodiversity emergency by the Broads Authority meeting November 2024 is included, so too is the Broads Nature Recovery Strategy and Norfolk & Suffolk Local Nature Recovery Strategies.

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Date of report: 23 January 2025

Appendix 1 – Local Development Scheme

Appendix 2 – Peat Topic Paper

Appendix 3 – BNG of more than 10% Topic Paper

Local Development Scheme
Timeline for producing the Local Plan for the Broads
Adopted February 2025

Local Plan for the Broads

	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26
Preparing REG19 Local Plan																				
Planning Committee to endorse consultation						18														
Broads Authority to endorse consultation						25														
Submission version consultation (REG19)						8 weeks														
Assess REG19 representations																				
Planning Committee to endorse submission										7										
Broads Authority to endorse submission										28										
Submission to Planning Inspector																				
Examination																				
Adoption																	...	...	...	...

Local Plan for the Broads
Peat Topic Paper

January 2025

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Contents

1: Introduction

Peat is an abundant soil typology in the Broads and an important asset. The current 2019 Local Plan for the Broads introduced a peat protection policy (DM10). The emerging Local Plan for the Broads seeks to take a stronger stance of development proposals that affect peat.

Peat was once mined as a fuel and then the land was drained for grazing and agriculture, which released carbon dioxide from the peat and lowered the land levels. Peatlands are now a nationally recognised wetland home to many priority species. The peat in the Broads stores vast amounts of carbon in its fens and wetlands.

2: About peat

Peat is one of the main soil types in the Broads and an important asset with important qualities, providing many **ecosystem services**[1]. In the UK at least 80% are damaged[2].

The total amount of carbon stored in peat in the Broads National Park is estimated at 12 to 14 teragrams or 12 to 14 million metric tonnes of carbon[3]. Peat soils release stored **carbon** if they are drained and allowed to dry out. The protection of peat soils is therefore critical to help address climate change. Lowland peat soils, such as those in the Broads, emit 85% of the UKs greenhouse gases from peatlands. Lowland emissions contribute over 4% to the UK's carbon emissions making them an important single source of global warming[4].

Peat soils support internationally important fen, fen meadow, reedbed, wet woodland and lake **habitats**. For example, milk parsley, the food plant of the Swallowtail caterpillar, tends to grow only on peat soils in the Broads.

Historic England has identified the Broads as an area of 'exceptional waterlogged heritage'[5]. Because of the soil conditions in the Broads, there is great potential for **archaeology** to be well preserved, giving an insight into the past.

The peat has accumulated over time and incorporates a **record** of past climatic and environmental changes that can increase knowledge of the evolution of the landscape.

Peaty soils help prevent flooding by absorbing and holding **water** like a sponge as well as filtering and purifying water. But that does not mean that peat soils should be considered as a water treatment process.

[1] The diverse benefits that we derive from the natural environment are sometimes referred to as ecosystem services. Examples of these services include the supply of food, water and timber (provisioning services); the regulation of air quality, climate and flood risk (regulating services); opportunities for recreation, tourism and education (cultural services); and essential underlying functions such as soil formation and nutrient cycling (supporting services). Payments for Ecosystem Services: A Best Practice Guide

[2] Peatland_Leaflet_ONLINE_V2_1.pdf

[3] Assessing carbon stocks within the peat of the Broads National Park

[4] Human activity means UK peatlands contribute to climate change | UK Centre for Ecology & Hydrology

[5] Historic England has identified the Broads as an area of exceptional waterlogged heritage. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past.

3: Current Local Plan policy on peat

The current Local Plan for the Broads 2019 includes policy DM10 that seeks to reduce the amount of peat excavated as a by-product of development. If peat is excavated, it seeks an appropriate re-use. There is also an adopted Guide that seeks to expand on this policy.

4: Government's peat policies

The **England Peat Action Plan** was published in 2021. The England Peat Action Plan sets out the government's long-term vision for the management, protection and restoration of our peatlands, so that they provide a wide range of benefits to wildlife, people and the planet.

Some key parts of the action plan are:

- 'All uses of peatland should keep the peat wet and in the ground'.
- 'Some areas of peatland are potentially susceptible to development pressure and it is vital that planning policies reflect the importance of managing peatlands and avoid detrimental climate, water and biodiversity impacts from development'.

The **Lowland Agricultural Peat Task Force Chair's report** was published in 2023. This emphasises the importance of peat saying 'When peat degrades, the landscape subsides, and the carbon once stored in the soil is lost to the atmosphere primarily as carbon dioxide; so much so that the process of peat degradation places England's lowland peat soils amongst the largest sources of greenhouse gas emissions in the UK's land use sector'. The report makes 14 recommendations to ensure lowland peat soils can be managed more sustainably.

Published by the Government in January 2024, the **Protected Landscapes Targets and Outcomes Framework** (PLTOF) establishes ambitious targets for National Parks and National Landscapes. It recognises the crucial role these nationally important landscapes play in achieving positive changes for nature, climate, people and place. One of the targets is: Target 7: Restore approximately 130,000 hectares of peat in Protected Landscapes by 2050. We have locally apportioned 200ha of peat restoration in the Broads to 2050 - see Broads Nature Recovery Strategy 2024-29. Peat restoration is about protecting it in situ, which involves managing or raising the water table.

In November 2022, ahead of COP27, the UK joined the **Net Zero Government Initiative** as a partner and signatory. This Initiative is led by the United States and participants agreed to develop and publish a roadmap laying out how they would bring their government emissions to net zero by 2050. The 2008 Climate Act committed the UK to reducing its greenhouse gas emissions by 80% by 2050 compared to 1990 levels formed the Committee on Climate Change, and established UK carbon budgets. In June 2019, this was strengthened, committing the UK to bring all greenhouse gas emissions to net zero by 2050. This is referred to as the UK net zero target. A study, led by the Centre for Ecology & Hydrology (CEH) and the James Hutton Institute, found that the overall greenhouse gas

emission from peatlands could exceed the equivalent of around 20 Megatonnes of CO_2 emissions each year – around 4% of the UK's total annual greenhouse gas (GHG) emissions.

4: Broads Authority projects relating to peat

The Authority has projects that relate to the restoration of peat:

- The Peat Discovery Project was funded through the government Nature For Climate Peatland Grant Scheme.
- Two Lowland Agricultural Peatland Projects received funding in 2024/25: Water Discovery Pilot and a Small Infrastructure Pilot.
- Fibrebroads was funded through the Paludiculture[6] Exploration Fund.
- Through our Farming in Protected Landscapes (FiPL) programme, we have supported projects that support reed cutters to maintain the fen habitat that grows on peat soils, providing a viable farming system, a vibrant ecosystem, and storing carbon.

With 24 peat cameras now installed in the Broads (2024), we are tracking sub-millimetre peat movements to monitor areas for peat-water levels and surface shrinkage measurement. Our water table modelling tools provide unparalleled assessments for lowland peatlands, which will help understand peat processes for sites across the UK. The key aim is to help farmers make informed decisions that support both Net Zero and Nature Recovery goals. With the data, land managers can explore the potential effectiveness of different management practices (involving raising water tables), enabling better-informed decision-making.

This funding has been provided to the Broads Authority and its partners to develop peatland restoration and wetland farming projects, as well as working with farmers, land managers and regulators to engage about project feasibility and water management in complex drained floodplain environments. The Broads Peat Projects are funded by Defra and supported by Natural England, the Association of Drainage Authorities (ADA), and the Environment Agency. They are delivered by the Broads Authority, Cranfield University, Broadland Water Abstractors Group, the UK Centre for Ecology & Hydrology, Norfolk FWAG, Norwich University of East Anglia, Hudson Architects, and Wetland Projects. The modelling tools have been shared with about 200 land managers and farmers.

5: Risks to peat in the Broads

In the Broads, the peat is at risk of degradation and drying out. This ultimately affects its special qualities. Indeed, if peat dries out, rather than being a carbon dioxide sink, it becomes a carbon dioxide source.

[6] Paludiculture is a farming and forestry system that involves rewetting peatlands to grow wetland crops and produce biomass.

Peat is a finite resource. It takes thousands of years for peat to form.

There are many risks to peat in the Broads: drainage, conversion to arable, overgrazing and compression due to machinery or too many livestock, contamination and development.

In terms of development which the Local Plan can influence/guide, the following table shows the applications that resulted in the excavation of peat as a by-product of development. This information is from May 2019 to end of March 2024.

Application number	Description	Volume of peat excavated
BA/2021/0456/FUL	Extend mooring basin, replace existing buildings	10,160 m^3
BA/2023/0180/FUL	Slipway	85m^3
BA/2021/0074/COND	Erection of boathouse in alternative location on site, variation of condition 2 of permission BA/2020/0078/HOUSEH	13 m^3
BA/2021/0105/FUL	Replace quayheading, widen wet dock and install finger jetty.	35 m^3
BA/2021/0444/FUL	New pontoon and access ramp	6.8 m^3
BA/2021/0235/FUL	Installation of ground source collector & 90 solar panels	1m^3
BA/2020/0378/HOUSEH	Replacement quay heading and boat house, installation of half-slip.	2m^3
BA/2020/0321/HOUSEH	Creation of a domestic slipway	1m^3
BA/2020/0309/FUL	Excavation of 3mx10m mooring cut	32.54m^3
BA/2020/0404/HOUSEH	Extension to mooring cut (retention)	60m^3
BA/2020/0055/FUL	2 plots Quay heading, mooring cut and replacement day hut	Not confirmed.
BA/2018/0514/FUL	Extension to mooring basin	1,595 m^3
BA/2020/0266/HOUSEH	Replace 14.6 metre of timber quayheading with steel piling and timber capping and whaling. Enlarge dock by 5m x1m	No exact figures. If any peat is found it will be sent to a receptor site in Brundall.
BA/2019/0384/HOUSEH	Mooring cut in quay heading	21.8m^3
BA/2020/0078/HOUSEH	Proposed erection of boathouse including the installation of quayheading and restoration of reed bed.	100.7m^3
BA/2019/0294/FUL	Replacement dwelling	97.2m^3
BA/19/0105/OUT	Erection of a Dairy and milking parlour building	Details were resolved as part of the REM application
Total	**-**	**Around 12,211.04 m^3**

The following application relates to habitat restoration and because of the environmental benefits it brings, was deemed to be acceptable. The proposed policy would likely still approve such a scheme.

Application number	Description	Volume of peat excavated
BA/2020/0238/FUL	Habitat restoration - Crassula Helmsii eradication	2,700 m^3

Over the past 5 years, permitted schemes that result in peat excavated as a by-product of development are set out in the above table. This amounts to around 12,200m^3 of peat that has been or will be excavated. The current Local Plan policy would have been followed and so it is expected that not all of that volume of peat would have dried out and thus become a source of carbon dioxide. This does however present a large volume of peat excavated and the aim is to restore peat, leaving it in situ.

6: Proposed policy on peat

Given the clear importance of peat in the Broads, and given that one of the areas that puts peat at risk is development, a stronger policy stance is proposed.

Peat is not a habitat, but it is a key component to some habitats and the Authority considers it irreplaceable in that it is very technically difficult and takes a very long time (perhaps thousands of years) to recreate once destroyed. Furthermore, peat can support lowland fen which is an irreplaceable habitat as defined by the NPPF[7]. And in terms of priority habitats, it can also support wet woodland, purple moor grass and rush pasture, coastal floodplain grazing marsh and reedbed.

A site in Salford that formed part of Greater Manchester's local spatial framework Places for Everyone was removed by Inspectors (February 2024) due to the development proposal's public benefits not outweighing the loss of deterioration of peat[8].

It is therefore proposed to have a policy in the Local Plan that takes the general thrust of the decision made by the Inspector who examined Greater Manchester's local spatial framework Places for Everyone and elevates the importance of peat to that of irreplaceable habitats.

See Appendix 1 for the proposed policy.

7: Wind turbines and peat – proposed policy

In the **NPPF consultation document** (summer 2024), there was a question relating to renewable energy on peat:

[7] See glossary: National Planning Policy Framework - GOV.UK
[8] IN37-Further-Action-Points-July-2023-Final-Publication.pdf (hwa.uk.com) and the final Inspector's Report

Question 74 *– Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?*

In the response to the consultation (December 2024), the Government said:

'The government welcomes the views provided in response to this question. Some habitats that include peat soils are already protected by the National Planning Policy Framework definition of irreplaceable habitats, including blanket bog and lowland fen. Given the breadth of further habitats which could be considered irreplaceable, including those containing peat, the government plans in due course to review and ensure the robustness of the definition of irreplaceable habitats to ensure it is comprehensive to support decision makers.

The government plans to publish a 12-week consultation on land use early in the New Year. The consultation will inform the development of a Land Use Framework for England, to be published in 2025. This will set out the government's vision for long-term land use change and focus on the principles for land use decision making and priority areas for policy change'.

There is also **emerging scientific work** relating to the impact of peatland windfarms on carbon emissions. For example, work undertaken by the University of Aberdeen: Planning peatland windfarms with carbon calculations – this website says: ''*When wind turbines are installed, carbon is not only released from the peat, but also during all stages of the process and it's important that we can understand how this process affects the amount of carbon dioxide being released into the atmosphere.*

"Although land restoration can help to mitigate further carbon release, often the payback time is calculated to be longer than the lifetime of the windfarm. If this is the case, developers, planners and campaigners can use this data to determine if the windfarm installation should go ahead'.

This document, **Clean Power 2030 Action Plan: A new era of clean electricity** (December 2024), sets out our first major steps towards clean power. In relation to peat, it says: *'We should therefore ensure delivery of our climate and nature targets wherever possible, in an integrated and joined up way. This means ensuring habitats like peatlands store rather than emit greenhouse gas emissions; or restoring salt marshes and sea grasses so that they are sequestering carbon as well as protecting our coastal communities from rising sea levels and extreme weather. This means that new energy infrastructure should be built in a way that protects the natural environment by following a "mitigation hierarchy" to do what is possible to avoid damage to nature, and then minimising, restoring and delivering compensation when damage is impossible to avoid'.*

Ultimately, the deeper the soil, the more carbon will be emitted during construction, which also rapidly decomposes the peat and creates large holes in the land. As the surrounding

peat drains into the holes, the peatland dries out, and huge quantities of carbon dioxide are released

It is therefore proposed to add the following under the wind turbine section of Policy PUBDM21: Renewable and low carbon energy:

Proposals for turbines or access routes located on peat soils are likely to not be supported.

8: Summary and conclusion

Peat is clearly an important soil type locally and nationally. It is at risk of excavation as a by-product of development. There is a clear direction to restore peat, and this is best done by keeping in situ. It is proposed that that emerging Local Plan has strong policies that protect peat, and the above wording is added to policy PUBDM21.

Appendix 1: Proposed policy on peat soils

Policy PUBDM12: Peat soils

See map: Appendix 10: Location of peat soils

1. Sites of peat soils[9] will be protected, enhanced, and preserved.

2. There will be a presumption in favour of preservation in-situ for peat soils.

3. Development resulting in the loss or deterioration of peat will be refused, unless there are wholly exceptional reasons (see supporting text), and a suitable compensation strategy is put in place by the applicant/developer, and it is demonstrated that:

i) There is not a less harmful viable option; and
ii) The amount of harm has been reduced to the minimum possible; and
iii) An evaluation is submitted to assess the impact of the proposal in relation to palaeoenvironments, archaeology, biodiversity provision and carbon content; and
iv) Satisfactory provision is made for the evaluation, recording and interpretation of the peat before commencement of development; and
v) The peat is disposed of in a way that will limit carbon loss to the atmosphere.

4. Development that seeks to enhance biodiversity but may result in some peat removal will still need to demonstrate the criteria i) to v) and that the biodiversity benefit will outweigh carbon loss.

5. Proposals to enhance peat and protect its qualities will be supported.

Reasoned Justification

Peat is an abundant soil typology in the Broads and an important asset. While there is a certain irony in protecting the peat soils in an area where the lakes originated from peat extraction, peat is a finite resource. This policy seeks to address schemes that result in the excavation of peat as a result of development. The Authority has other projects that relate to the restoration of peat such as The Peat Discovery Project and Creating a New Approach to Peatland Ecosystems.

Ecosystem services

Peat has many qualities and provides many ecosystem services:

- **Climate change:** The total amount of carbon stored in peat in the Broads National Park is estimated at 12 to 14 teragrams or 12 to 14 million metric tonnes of carbon[10]. Peat soils release previously stored carbon when they are dry. UK peats therefore represent both a threat and an opportunity with respect to greenhouse gas emissions. Correct

[9] Peat is a partially decomposed mass of semi-carbonised vegetation which has grown under waterlogged, anaerobic conditions, usually in bogs or swamps

[10] Assessing carbon stocks within the peat of the Broads National Park

management and restoration could lead to enhanced storage of carbon and other greenhouse gases in these soils, while mismanagement or neglect could lead to these carbon sinks becoming net sources of greenhouse gases.

- **Biodiversity:** Peat soils support internationally important fen, fen meadow, wet woodland, and lake habitats. 75% of the remaining species-rich peat fen in lowland Britain is found in the Broads. Milk parsley, the food plant of the Swallowtail caterpillar, grows only on peat soils. Fen orchids have their UK stronghold in the Broads, so the peat soils are critical for the survival of this species. Other rare and important plant and invertebrate communities (collection of species) are supported by the peaty soils.
- **Archaeology:** Historic England has identified the Broads as an area of *exceptional waterlogged heritage*. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past. Archaeology is discussed in more detail in the Heritage section of this Plan.
- **Palaeoenvironments:** The peat has accumulated over time and thus incorporates a record of past climatic and environmental changes that can be reconstructed through, for example, the study of its stratigraphy and pollen content, leading to increased knowledge of the evolution of the landscape.
- **Water:** Peaty soils help prevent flooding by absorbing and holding water like a sponge as well as filtering and purifying water. Peat can absorb large quantities of nutrient and other pollutants, although peat soils can under certain conditions release these chemicals back into the surrounding water.

How peat quality can be impacted

Land management that could impact on the quality of the peat soil includes land drainage, introduction of polluted water, burying the peat under hard surfaces or gardens, compacting peat and peat removal to change the land use.

Peat. Priority habitat. Irreplaceable habitat.

NPPF (2024) para 193c) says 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons[67] and a suitable compensation strategy exists'.

Footnote 70 says 'For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat'.

The NPPF glossary defines 'irreplaceable habitats' as 'habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, considering their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen'.

Priority habitats and species are defined by the NPPF as 'Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006'. Lowland fen is a priority habitat under the UK Biodiversity Action Plan and the EU Habitats Directive because of the quality and diversity of species it supports. Lowland Fen is also classed as an 'irreplaceable habitat' in the NPPF. The Joint Nature Conservation Committee (JNCC) says 'fens are peatlands which receive water and nutrients from the soil, rock and ground water as well as from rainfall: they are minerotrophic'.

Peat is not a habitat, but it is a key component to some habitats and the Authority considers it irreplaceable in that it is very technically difficult and takes a very long time (perhaps thousands of years) to recreate once destroyed. Furthermore, peat can support lowland fen which is an irreplaceable habitat as defined by the NPPF. And in terms of priority habitats, it can also support wet woodland, purple moor grass and rush pasture, coastal floodplain grazing marsh and reedbed. The tests set out in the NPPF will need to be passed for development that negatively impacts peat to go ahead.

A site in Salford that formed part of Greater Manchester's local spatial framework Places for Everyone was removed by Inspectors due to the development proposal's public benefits not outweighing the loss of deterioration of peat[11].

Biodiversity enhancements schemes

On occasion, for nature conservation benefits, peat can be removed to create shallow turf ponds or scrapes (areas of temporary open water) on areas of fen or scrub habitat to maximise the biodiversity value and hold back succession to woodland habitat. The removal of peat can also be necessary for conservation management – for example, the most biodiverse areas of UK fen occur in areas where the turf has been stripped and vegetation subsequently grown back. This policy allows for such operations, provided they can justify the proposal against the criteria set out in the policy.

Excavation of peat as a mineral resource

The NPPF and NPPG mentions peat soils specifically in relation to its excavation as a mineral resource, rather than the issue in the Broads relating to impact due to groundworks from development and inappropriate land management.

If the public benefit of a scheme is proved to clearly outweigh the loss or deterioration of peat

The policy and NPPF seeks protection of peat soils through changes in the location of development in the first instance and then designing proposals to minimise disturbance to the qualities of the peat and the amount of peat removed. Development proposed on areas of peat would require justification for the need to site the development on peat, and subsequently a peat assessment that shows how efforts have been made to reduce adverse

[11] IN37-Further-Action-Points-July-2023-Final-Publication.pdf (hwa.uk.com) and the final Inspector's Report

impacts on peat. Proposals that would result in removal of peat are required to assess the archaeological and paleoenvironmental potential of peat and make adequate recordings prior to removal.

To prevent the loss of carbon to the atmosphere that is sequestered in peat soils, disposal is of great importance. The Authority expects peat to be disposed of in a way that maintains the carbon capture properties. Peat needs to go somewhere where it can remain wet (and hence retain its function to lock up carbon and prevent it being released into the atmosphere) or potentially provide a seedbank (the potential for ancient peat to provide a viable seedbank may need to be evidenced) or be reused for local benefit (for example by boosting organic matter in degraded arable soils). When dry, peat changes its properties and oxidizes, so transfer to the receiving site would need to be immediate.

The Broads Authority has produced a guide to understanding and addressing the impact of new developments on peat soil. This Peat Guide (or successor document) provides additional information to help applicants meet the requirements of the related peat policy. It seeks to reduce the amount of peat excavated, ensure the special qualities are addressed, and that any peat excavated it disposed of in a way to ensure stored carbon is not emitted into the atmosphere.

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

February 2025

Contents

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 document[1] (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 2011[2]

The project aims were as follows:

1. To quantify the national biodiversity importance of the Broads.
2. To quantify the relative numbers of priority species within different Broads habitat assemblages.
3. To understand the spatial distribution of these priorities.

[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)

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.

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 Book[3] 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 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.

[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.

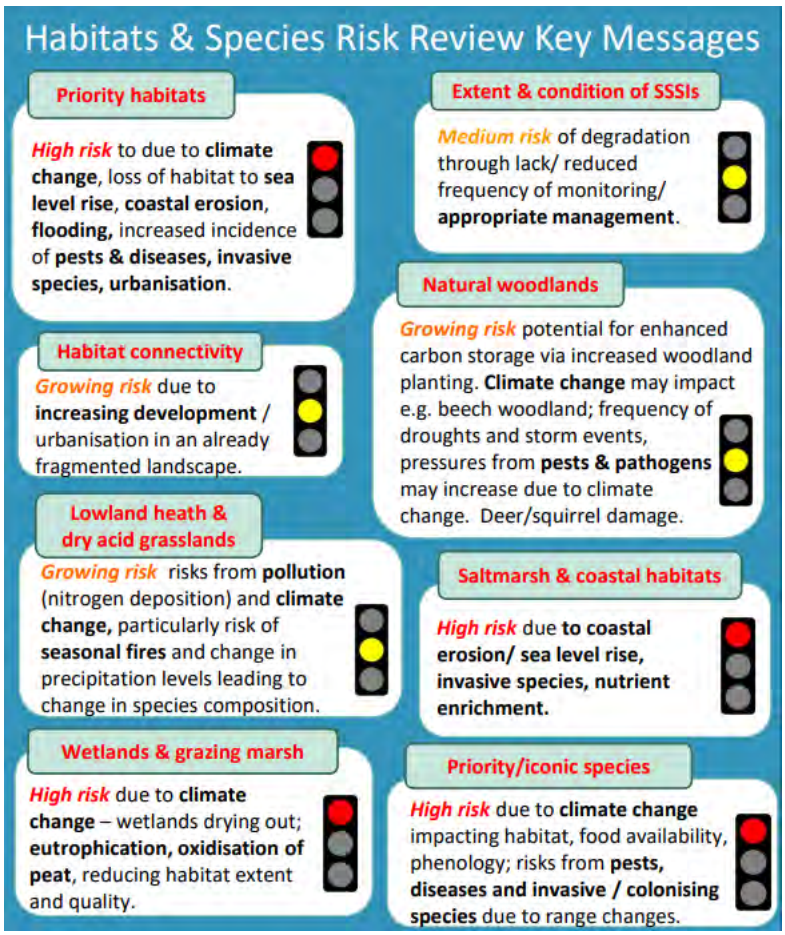
2.4 Evidence from Natural Capital Compendium[4]

The purpose of the 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 and species, copied below, with some infographics about the key messages on the habitats and species risk review which is also available below. In addition to the habitats and species risk review, there are also sections about risks to freshwater, risks to coast and 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)



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

The Broads Authority has declared a biodiversity emergency. The statement, endorsed at Broads Authority meeting November 2024 is as follows:

Biodiversity emergency statement - Broads Authority

Context

As part of the family of protected landscapes in England, we recognise that no single site or organisation can address the exacerbating impact of climate change on biodiversity loss.

The Broads Authority notes with concern reports from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) on global species and habitat loss, and also that the Broads has been losing species at a rate of six per decade for half a century. Iconic species in the Broads are further at risk from the impact of climate change, including warmer, wetter winters, and sea-level rise.

The Broads Biodiversity Audit demonstrates the importance of the Broads for UK rare species. The Audit showed that nearly a third of the conservation priority species once found in the Broads have not been recorded since 1988, with many confirmed to be no longer existing in the Broads.

Healthy ecosystems, supported by good ecological condition and sustainable management, deliver vital public goods such as food, recreation, tourism, water, abundant wildlife, and landscape character. The Broads Authority aims to protect the biodiversity that underpins these ecosystems, benefiting visitors, communities, and businesses in the Broads.

Protected landscapes, like the Broads, hold unique cultural and personal significance, offering spaces for connecting with nature. The Broads Authority plays an influential role in addressing the biodiversity crisis by inspiring land use choices and fostering a deeper connection between people and nature.

Therefore, the Broads Authority resolves to:

- Declare its recognition of the global biodiversity emergency and the local impact this could have on Broads communities;
- Engage with a diverse range of partners: local authorities, environmental NGOs, farmers, the private sector, and local communities, to drive collective action;
- Adopt the Broads Nature Recovery Strategy and seek to implement the 2024-2029 delivery plan towards biodiversity recovery in the Broads;
- Inspire behavioural change, through educational activities, by informing visitors and local communities to take active roles in conservation efforts;
- Support the development of the Local Nature Recovery Strategies in Norfolk and Suffolk; and
    - Develop initiatives in partnership which achieve large-scale benefits, including: Fostering collaboration and knowledge exchange;
    - Expanding networks to enable habitat restoration and connection;
    - Enhancing the Broads Authority estate to support native species;
    - Supporting nature-based solutions; and
    - Connecting with initiatives beyond the Broads to inspire conservation efforts elsewhere.

This approach highlights the Authority's commitment to reversing biodiversity loss while positioning the Broads as a leader in ecological resilience and nature recovery.

The BA has declared a biodiversity emergency.

2.6 Broads Plan[5]

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. 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

A key aim of the Broads Plan is: '*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*'.

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;

[5] Broads Plan 2022 - 2027 (broads-authority.gov.uk)

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

- 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.

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 BAP[14] 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 that: 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 Environmental impacts and biodiversity gains and losses

Some of the most significant environmental impacts and biodiversity gains and losses over the last five years include:

- Tidal surges into the Broads' freshwater ecosystem. Environment Agency water level monitoring in 2023 showed the lowest and the highest water levels on Hickling Broad since monitoring began twenty years earlier, creating high water in the floodplain fens. The winter flooding of 2023/24 was prolonged and exceptional, with certain impacts on species and habitats.
- Longer and more intense droughts, such as in summer 2022, drying out fens and marshes, threatening species, releasing carbon stocks and further shrinking land levels.
- Rising temperatures, pushing species into different climate envelopes and making the Broads unsuitable for many species, and suitable for new species. There is insufficient species monitoring ongoing to know the precise changes in the Broads over the last five years, but these years have been warmer than previous years. Shade from trees will be more important for wetland wildlife.
- The rivers and broads are relatively cleaner compared to the 1970s, but there has been little change in the nutrient concentration in the past five years, although water plants and clarity continues to improve in upper river reaches. New hazardous chemicals and microplastics compound the well documented nutrient pollution.
- Improved reedbed restoration and management (including harvesting reed and sedge for traditional thatch) have seen a continued growth in populations of Broadland species such as Bittern, Crane and Marsh Harrier. Fen Orchid translocation success is being assessed.
- The Swallowtail butterfly continues to disappear from sites. In 2023, it was reported to be breeding on just 16 sites in the Broads, down from 22 sites a few years ago
- Species translocation and investigations such as Fen Raft Spider, Lesser Whirlpool Ramshorn Snail, Nathusius Pipistrelle and Milk Parsley are positive, improving knowledge, development and action to support species recovery.
- There is evidence that agri-environment schemes are benefiting breeding Lapwing and Redshank, both inside and outside nature reserves.
- The BA's direct grant from the Department for Environment, Food and Rural Affairs (Defra) has shrunk by 40% in real terms since 2010. Many other Government funded bodies and NGOs working in the Broads have been similarly impacted.
- There has been ongoing nature recovery and land acquisition by the Wildlife Trusts, RSPB and BA in the past five years (notably around extending the Halvergate Fleet, Hickling, Carlton Marsh, Worlingham Marsh and fen at Hulver Ground).

2.11 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 2024[7]. These targets promote the actions that are most needed to achieve positive changes. They set the ambition for

[7] Protected Landscapes Targets and Outcomes Framework - GOV.UK (www.gov.uk)

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

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.

2.12 Campaign for National Parks Health Check Report on National Parks

National Parks Health Check Report - Campaign for National Parks (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.

2.13 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 2043[8], 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.

2.14 A changing climate

The changing climate puts wildlife at further risk[10] ; 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 affected[11].

The changing climate puts wildlife at further risk.

2.15 The Broads Nature Recovery Strategy

The Broads Nature Recovery Strategy (BNRS) (2024-2029) replaces the Broads Biodiversity and Water Strategy (2019-2024) and was adopted in November 2024. It includes a 5-year Delivery Plan which outlines priority actions, either led by the Broads Authority or in partnership with others, as well as projects managed by other organisations working in the

[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) – The potential impacts of climate change on the biodiversity of Norfolk

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

Broads. The strategy will be monitored by the Broads Biodiversity Partnership (BBP), a network of organisations, businesses, and individuals working collaboratively to enhance habitats and species.

The BNRS includes a vision, guiding principles, and details on available resources and mechanisms, such as biodiversity net gain. It assesses the state of the Broads natural environment, including biodiversity gains and losses, drivers of change, pressures, risks, and opportunities. The headline of the vision is for Biodiversity to be thriving in the Broads, which remains a globally important wetland adapting to climate change.

The BNRS 5-year Delivery Plan will be implemented alongside other relevant plans such as the Broadland Rivers Catchment Plan, the Authority's strategies for managing waterways, tourism, education and integrated access, and site-based plans.
The delivery actions are organised under four foci:

i. Water quality and quantity
ii. Habitats (wet grassland, fen, fen meadow, reedbed, woodland)
iii. Species
iv. Monitoring and research (across all three focus above)

To support the new national and regional provisions, the BA is working with key partners to prepare and deliver the Broads Nature Recovery Strategy (BNRS).

2.16 Norfolk and Suffolk Local Nature Recovery Strategy (LNRS)

LNRS are one of the mechanisms to achieve the Nature Recovery Network, a growing national network of wildlife-rich sites, supported by green and blue spaces that buffer and connect these sites. Preparation of each LNRS is led by a 'responsible authority' (County or Unitary Council) appointed by the Defra Secretary of State. The Broads is covered by the Norfolk LNRS and the Suffolk LNRS, and the BA is a 'Supporting Authority'. The emerging LNRS identifies the Broads as having extensive important biodiversity areas and significant opportunity areas that could be further enhanced for biodiversity.

The emerging LNRS identifies the Broads as having extensive important biodiversity areas and significant opportunity areas that could be further enhanced for biodiversity.

2.17 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 Captial 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".

e) The BA has declared a biodiversity emergency.
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) Droughts and tidal surges and species disappearing from sites.
k) 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 benefit wildlife.
l) 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.
m) Pressures on land use and fragments landscapes are affecting wildlife.
n) The changing climate puts wildlife at further risk.
o) To support the new national and regional provisions, the BA is working with key partners to prepare and deliver the Broads Nature Recovery Strategy (BNRS).
p) The emerging LNRS identifies the Broads as having extensive important biodiversity areas and significant opportunity areas that could be further enhanced for biodiversity.

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: Conclusion

The importance of the Broads as one of Europe's finest and most important wetlands for biodiversity and nature conservation is borne out by its many sites afforded international, national or local nature conservation status. A quarter of the executive area is designated as 'Wetland Habitats of International Importance' under the Ramsar Convention for its incredibly rich biodiversity. This includes around 75% of the remaining species-rich peat fen in lowland Britain, wet woodland (almost entirely confined to East Anglia) and Breydon estuary, which supports the highest density of wintering birds of any UK estuary. The tens of thousands of birds that visit the estuary and surrounding grazing marshes create a rich spectacle, with Pinkfooted Geese, Wigeons, and Black-tailed Godwit on the water, and Redshanks, Avocets and Lapwings foraging in the mud and wet grasslands. Birds of prey, such as peregrine and harriers, also use the vast stretches of wet grassland and estuary. The Broads supports a number of Local Nature Reserves and local wildlife sites.

Fundamentally, given the information in this topic paper that describes the losses of wildlife in the Broads, the importance of the Broads to wildlife and the opportunities the Broads offers to wildlife, it is clear that increasing the threshold for BNG is essential to help deliver biodiversity gains. Increasing BNG to 20% provides opportunities to aid habitat/species adaptability and maximise these to help compensate for losses arising from development (as one of the threats/opportunities). Increasing the BNG threshold also creates higher likelihood of gains in habitat connectivity.