



Committee name: Sustainable development panel

Committee date: 27/02/2024

Report title: Draft Statutory Biodiversity Net Gain Supplementary Planning Document

Portfolio: Councillor Fulton-McAlister, cabinet member for regulatory services

Report from: Head of planning and regulatory services

Wards: All Wards

OPEN PUBLIC ITEM

Purpose

To present information on statutory Biodiversity Net Gain and the contents of the draft Statutory Biodiversity Net Gain Supplementary Planning Document.

Recommendation:

It is recommended that Sustainable Development Panel authorise public consultation on the Draft Statutory Biodiversity Net Gain Supplementary Planning Document.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets the Norwich is a sustainable and healthy city corporate priority

This report addresses the following priorities the Corporate Plan: reduce carbon emissions, protect the environment and adapt to climate change; and protect and invest in our parks, green spaces and biodiversity.

This report helps to meet the strategic objectives of the Biodiversity Strategy 2022-2032, and multiple actions from the Biodiversity Development Plan.

Report details

Biodiversity Net Gain

1. The Environment Act 2021 introduced the concept of statutory Biodiversity Net Gain (BNG) which requires that relevant developments must deliver at least 10% net gain in site biodiversity compared with its pre-development biodiversity level. BNG applies to all major development planning applications (except exempt development) made on or after 12 February 2024. BNG applies to all other minor development planning applications (except exempt development) made on or after 2 April 2024.
2. Applicants will need to submit a calculation of the pre-development biodiversity value of their site with their planning application along with plans showing the locations of habitats on the site. The calculation must be done using the statutory biodiversity metric.
3. If the planning application is approved, all planning applications subject to BNG will include a general biodiversity condition on the decision notice that requires the submission and approval of a Biodiversity Gain Plan (BGP) prior to commencement of development. The BGP should set out a post-development calculation of biodiversity value and proposed mitigation and enhancement measures to achieve at least 10% BNG. Significant on-site BNG and all off-site BNG needs to be secured for 30 years by legal agreement.
4. Not all development and planning applications are subject to the BNG requirement, and the government has produced a list of exempt development and application types.
5. All references to BNG in this report refer to statutory BNG. The Supplementary Planning Document (SPD) referred to in this document relates to statutory BNG only and relates to Policy 3 of the GNLP in so far as statutory BNG applies. Further work is anticipated to assist with the implementation of non-statutory BNG covered by Policy 3.

Existing Policy Context

6. Protecting and enhancing biodiversity through development proposals is already a part of the [National Planning Policy Framework \(NPPF\)](#) (paragraphs 180(d) and 186 (d)) however, the Framework does not specify the amount of enhancement that should be provided. The NPPF also already affords protection to specific designations such as irreplaceable habitats.
7. The current local plan for Norwich is made up of the [Joint Core Strategy \(JCS\) for Broadland Norwich and South Norfolk \(2014\)](#), the [Norwich Site Allocation Policies Local Plan](#) (Site Allocations Plan), and the [Norwich Development Management Policies Local Plan](#) (DM Policies Plan). BNG is a new concept and is therefore not referred to in the currently adopted local plan documents. However, policy 1 of the JCS sets out that development will protect, maintain, restore and enhance environmental assets, expand and link valuable open spaces of biodiversity importance to create green links, minimise fragmentation of habitats and contribute to a multi-functional green network. Policies DM3 and DM6 of the DM Policies Plan outline that all new development will be expected to make appropriate provision to safeguard and enhance habitats and create a biodiversity-rich environment, and that development will be

expected to avoid harm to and protect and enhance the natural environment of Norwich, including both sites and species.

8. Once adopted, the [Greater Norwich Local Plan](#) (GNLP) will replace the JCS and the Site Allocations Plan for Norwich (adoption anticipated March 2024). Therefore, information pertaining to the JCS will not be included in the adoption versions of BNG documents. Policy 3 of the GNLP sets out that development proposals will be required to conserve and enhance the natural environment through appropriate design and avoiding harm to natural assets and should have regard to delivering local green infrastructure strategies. It also sets out that at least 10% BNG must be demonstrated as part of development proposals.
9. In 2019, the council declared a climate and environmental emergency in acknowledgment of the importance of and connection to our ecosystems. This has formed key policy priorities for the council and has become an integral part of the council's [2040 City Vision](#). The council has also produced a [Biodiversity Strategy](#) which commits to create a city where biodiversity can recover and thrive, halt species decline and increase species abundance by 2030.
10. The council is also involved in the production of several evidence studies which will help inform the delivery of BNG on development sites. The council commissioned The Norwich Biodiversity Baseline Study 2024, which is now complete, and the Greater Norwich authorities are also updating their Green Infrastructure (GI) Strategy. The GI strategy is currently in preparation and is currently anticipated for completion by the end of 2024.
11. [Local Nature Recovery Strategies](#) (LNRS) also became a new statutory requirement under the Environment Act 2021. LNRS will agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities. There will be 48 strategy areas which altogether will cover the whole of England. Norfolk County Council have been appointed for producing the LNRS for our area. The early stages of LNRS preparation is underway but not anticipated for completion until 2025.

The Norwich Biodiversity Baseline Study 2024

12. At the end of 2022, the council commissioned Norfolk County Council to produce a biodiversity baseline study for Norwich. The key drivers for this commission were needing to understand the existing state of biodiversity in Norwich before the implementation of mandatory BNG and that the Norwich City Council Biodiversity Strategy and Development Plan identified needing a baseline assessment as one of its actions. This is a key evidence base which sets out what the existing biodiversity baseline is in Norwich, with information on key species, and threats to biodiversity. The study outlines opportunity areas within Norwich and includes some site-specific biodiversity recommendations.
13. The baseline study is largely a desk-based assessment of biodiversity in Norwich. Significant amounts of data and information already exist through NBIS records, Norfolk Wildlife Trust records, open access data, and information from local recorders and volunteer groups. The baseline study brings this all together into a single assessment of the biodiversity baseline. Some site-based assessments were undertaken on key sites where additional information was required.

14. The study identifies that Norwich has a good variety of habitat types and recorded species and contains many protected sites for both biodiversity and geodiversity. It has produced a suite of maps to spatially represent the data, including a hotspot map which shows areas of highest biodiversity value. The study has also developed Biodiversity Character Areas (BCAs), which are based on shared biodiversity characteristics and themes and give a strategic overview of biodiversity in Norwich. BCAs are also useful tools to help determine the most appropriate actions for biodiversity in the most appropriate locations.
15. The study has also produced a Survey and Monitoring Framework. This sets out recommendations for filling in any data gaps identified in the baseline study, actions for monitoring biodiversity changes and measuring conservation success.
16. Both the baseline study and the survey and monitoring report conclude with a set of key recommendations. These recommendations are not solely actions for Norwich City Council but apply to a wide range of stakeholders including other local public and private organisations, national organisations, volunteers, and local community groups. The recommendations are a set of opportunities and will need to undergo feasibility work to shape future priorities and resource allocation.
17. The biodiversity baseline study and survey and monitoring framework are important evidence documents in the implementation of BNG as they provide useful background information that can be used both in the design of development and in decision-making.

Draft BNG Supplementary Planning Document

18. The Draft BNG Supplementary Planning Document (SPD) has been produced to:
 - support the implementation of national regulations and policy in relation to statutory BNG;
 - support local policy in the GNLP (shortly to be adopted) in so far as statutory BNG applies;
 - build on best practice guidance and government advice;
 - set out the priorities for biodiversity in Norwich to ensure development is delivering the right protections and enhancements in the right places;
 - to support applicants in gaining planning permission by setting out expectations in relation to BNG;
 - and to build knowledge around biodiversity enhancement.
19. It was originally intended for the BNG document to take the form of a guidance note as Norwich City Council does not currently have an adopted BNG policy. The intention was to convert this guidance into an SPD at a later date following adoption of the GNLP. However, due to delays in programme timetables, the BNG document would be adopted after the anticipated adoption of the GNLP, which does include policy 3 pertaining to BNG. The decision has been made to

produce an SPD to support this policy, in so far as statutory BNG applies, instead of informal guidance as it will have greater weight in decision making, and negates the need for further periods of consultation to convert guidance into an SPD.

20. The SPD will be subject to statutory consultation prior to adoption by the council and as such will be a material consideration relevant to the determination of planning applications.

21. The following summarises the main sections of the draft SPD:

a) Purpose and status

Sets out the reasons for producing the document and how it should be considered in decision-making.

b) Policy context

Outlines the national and local legislation, policy and guidance relevant to BNG and the planning process, and how the draft SPD sits within that existing framework. This section also considers emerging work and how the SPD is expected to interact with and inform this going forwards.

c) Biodiversity in Norwich

Summarises key information and findings from the Norwich Biodiversity Baseline Study 2024 and includes maps extracted from the study showing Norwich's existing natural assets, biodiversity hotspots and the newly developed Biodiversity Character Areas.

d) Introduction to the mandatory BNG requirement

Sets out the key BNG principle of achieving at least 10% BNG, the wording of the general biodiversity condition that will be applied to decision notices of all relevant planning permissions, the dates which BNG becomes mandatory, and links to development and application types exempt from BNG.

e) BNG in the planning process

Includes a flowchart expressing simplified information on how BNG works through the planning process starting from design of development through to the post-construction phase and monitoring.

f) General principles for BNG

Sets out some key principles for BNG that can apply across the planning process. This includes signposting to good practice principles and the British Standard for designing and implementing BNG and encouraging applicants to engage in the council's pre-application process.

This section signposts to the biodiversity gain hierarchy which sets out the order of preference of how BNG should be delivered. The hierarchy emphasises that on-site gains should be considered first, followed by off-site gains (which must be registered on the Natural England register) and purchasing statutory biodiversity credits as a last resort.

This section also introduces the statutory biodiversity metric which should be used to calculate biodiversity value for planning applications. The biodiversity metric allows uplifts to calculated biodiversity units if habitats and their locations are deemed to be strategically significant. This is important because it ensures that the loss of those habitats is appropriately compensated for, but also recognises the value of any newly created strategically significant habitats.

National guidance outlines that strategically significant locations should be determined using local strategies and the SPD specifies that the Norwich Biodiversity Baseline Study 2024 should be used for this purpose. The SPD sets out the methodology to be used and references resources in the appendix to assist with its application.

g) Information required to support a planning application

Outlines the information required by the national regulations to be submitted with a planning application and an application to discharge the general biodiversity condition, including links to more detailed government guidance where relevant. This section also includes a list of information that the city council strongly encourages applicants to submit with their applications. At present, relatively minimal information is required to be submitted up front. This list aims to provide planners with greater confidence that the BNG requirement can be achieved, and also to better advise applicants earlier in the process if there are likely to be other issues to consider, such as requiring a legal agreement to secure the BNG.

h) Delivery of BNG

Includes a description of what on-site and off-site BNG delivery is and in which cases it is likely that a legal agreement will be required to secure the BNG. This section also signposts to government guidance on using registered off-site gains and how to purchase statutory biodiversity credits. Information is also provided on how the management and monitoring of BNG should be undertaken.

This section of the SPD is less detailed than other sections as information on monitoring and enforcement processes and responsibilities within the council are yet to be decided. Instead, this section has been kept brief, with general information that the council can charge a fee for BNG monitoring, charges which would be determined at a later date.

i) Appendix with resources for biodiversity metric

Includes resources extracted from the Norwich Biodiversity Baseline Study 2024 to assist in the application of strategic significance uplift in biodiversity metric calculations. This includes a decision tree and worked example scenarios to explain the approach, along with supporting information on maps and appropriate habitats.

22. In accordance with the council's Statement of Community Involvement, the SPD needs to undergo a statutory consultation for a minimum period of 4 weeks. The proposed timeline is to commence the consultation period 28

February 2024 which will run to 27 March 2024. The SPD will be reviewed in light of any comments received during the consultation, and an amended final version will be reported back to Sustainable Development Panel, followed by cabinet in June 2024.

Conclusion

23. Statutory BNG requires that all major applications made on or after 12 February 2024 (or 2 April 2024 for small sites), subject to exemptions, will need to achieve at least a 10% net gain in the biodiversity value of a site compared to its pre-development biodiversity value.
24. The city council has produced a draft BNG SPD to provide additional guidance and information on implementing BNG through the planning process, to assist applicants with their planning application submissions and planners in decision-making.
25. The Norwich Biodiversity Baseline 2024 is a key evidence base for implementing BNG in Norwich and identifies the city's existing natural assets, threats and opportunities for future protection and enhancement. This can be used to support the implementation of BNG in Norwich, and specific resources and methodologies developed through this work are referred to in the BNG SPD.
26. The recommendation is for Sustainable Development Panel to authorise public consultation on the draft BNG SPD. This will run for a period of 4 weeks in accordance with the council's Statement of Community Involvement. Following this, any amendments will be made to the SPD and will be reported back to Sustainable Development Panel, followed by Cabinet for adoption.

Consultation

27. Officers across the council have been consulted throughout the development of the Norwich Biodiversity Baseline Study 2024 and have been given the opportunity to comment on the draft BNG SPD.
28. The relevant portfolio holders for Regulatory Services, Climate Change and Communities and Social Inclusion have been briefed on this report.

Implications

Financial and resources

29. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.
30. The preparation of this report and the draft BNG SPD (including public consultation) are considered day-to-day activities of the planning policy team and therefore has been accounted for in the planning policy budgets for the relevant periods.
31. The Biodiversity Baseline Study was commissioned using grant funding from DEFRA to assist in activities in preparation for mandatory Biodiversity Net Gain. The total cost of this study was covered by the grant funds.

Legal

32. Biodiversity Net Gain will become a mandatory requirement for relevant applications made on or after 12 February 2024 (or 2 April 2024 for small sites) (subject to exemptions) as introduced by: The Environment Act 2021, The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2023, The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2023, The Biodiversity Gain Site Register Regulations 2023, The Biodiversity Gain Requirements (Exemptions) Regulations 2023, The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2023, and The Biodiversity Gain (Town and Country Planning) Modifications and Amendments) (England) Regulations 2024.
33. Any significant on-site and all off-site BNG must be secured via a legal agreement for a period of 30 years.
34. The Draft BNG SPD will undergo public consultation for a period of 4 weeks, aiming to start on 28 February 2024 and running to 27 March 2024. The end of this consultation period overlaps marginally with the pre-election period which commences 25 March 2024.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	An EqIA has been appended to this report. The EqIA concludes there are no implications arising from this report.
Health, social and economic impact	No implications arising from this report.
Crime and disorder	No implications arising from this report.
Children and adults safeguarding	No implications arising from this report.
Environmental impact	<p>BNG will have a positive impact on the environment by requiring development proposals to achieve at least 10% net gain in biodiversity.</p> <p>This report details an SPD, and a background evidence base which provide more detailed and up to date information on biodiversity in Norwich. This information can be used in the design of new development and will enable more informed decision-making.</p>

Risk management

Risk	Consequence	Controls required
Not authorising consultation on the Draft BNG SPD.	<p>Delays would reduce the amount of time available for the consultation before the pre-election period commences. This could result in delay to adoption of the SPD which could have implications on planning decision making.</p> <p>OR</p> <p>The SPD cannot be adopted without being subject to public consultation. This would result in a lack of information and guidance for applicants and planners in decisions making.</p>	Officers across the council, relevant portfolio holders and Executive Leadership Team have been briefed on the draft SPD and evidence base to ensure any questions/issues are picked up at an early stage to minimise the risk of not gaining authorisation to consult.

Other options considered

35. One alternative option is not to produce an SPD. This option is not recommended as the SPD provides additional and detailed information to assist with the effective implementation of BNG in Norwich. Without this information, implementing BNG through the planning application process is likely to prove more challenging and time consuming.
36. Another alternative option is to produce an informal BNG guidance note. This is not recommended as informal guidance is given less weight in planning decision making. In addition, it is likely that any informal guidance would need to be converted to an SPD. This would require a further period of public consultation and reporting and is therefore not considered the most efficient process.

Reasons for the decision/recommendation

37. BNG will become mandatory for major development (subject to exemptions) on 12 February 2024. The Draft Statutory Biodiversity Net Gain SPD has been prepared to provide information to applicants on how BNG works in the planning process, and to provide additional detail and clarity for decision-making. Without this SPD, it is likely that implementing BNG through the planning process will be more challenging and time consuming. Supplementary Planning Documents are required to go through a period of public consultation prior to adoption.

38. Therefore, the recommendation is to note the contents of this report and authorise the public consultation period on the Draft Statutory Biodiversity Net Gain SPD.

Background papers:

None

References:

[Norwich Biodiversity Baseline Study 2024](#)

[Appendices](#)

[Annexe 1 & Annex 2](#)

[Supporting Information](#)

Appendices:

Appendix 1 – Draft Statutory Biodiversity Net Gain Supplementary Planning Document

Appendix 2 – Executive Summary of the Norwich Biodiversity Baseline Study 2024

Appendix 3 – EqIA for the Draft Statutory Biodiversity Net Gain Supplementary Planning Document

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Statutory Biodiversity Net Gain Supplementary Planning Document



NORWICH
City Council

February 2024 DRAFT



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1. Introduction

- 1.1** Biodiversity is the variety of all life on Earth. It includes all species of animals and plants, and the natural systems that support them ([JNCC, 2022](#)). Biodiversity matters for our environment to function, but also because it helps to provide essential environmental, social and economic services including climate regulation, food production, and supporting human health and wellbeing.
- 1.2** Norwich City Council is proud of our beautiful, unique and diverse city and its natural environment. In 2019, the council declared a climate and environmental emergency in acknowledgment of the importance of and connection to our ecosystems. This has formed key policy priorities for the council and has become an integral part of the council's [2040 City Vision](#). The council has also produced a [Biodiversity Strategy](#) which commits to create a city where biodiversity can recover and thrive, halt species decline and increase species abundance by 2030. As part of its preparation of the joint [Greater Norwich Local Plan](#) (GNLP), the city council also committed to the implementation of biodiversity net gain, prior to the government's mandatory requirement. Work done to date sets the tone for greater aspiration for the protection and enhancement of biodiversity in Norwich.
- 1.3** Development can impact biodiversity through loss of natural habitat. One key mechanism for protecting and enhancing biodiversity is through the planning and development process. Effective local planning policies, implementation of national legislation and well-designed places will help to bring numerous benefits for the protection and enhancement of biodiversity.
- 1.4** The introduction of statutory Biodiversity Net Gain (BNG) for new developments was introduced by the [Environment Act 2021](#). The concept of statutory BNG requires that all relevant developments must deliver at least 10% net gain in site biodiversity compared with its pre-development biodiversity level. This document is intended to assist in implementation of these strengthened responsibilities and forms one part of a suite of measures that Norwich City Council is employing to address the climate and environmental emergencies in Norwich.
- 1.5** All references in this document to BNG refer to statutory BNG.

2. Purpose and status of this document

- 2.1** The key objectives of this Supplementary Planning Document (SPD) are:
- To support the implementation of national legislation and policy in relation to statutory BNG;
 - To support local policy in the Greater Norwich Local Plan in so far as statutory BNG applies;
 - To build on best practice, government advice and other standards relating to BNG;

- To set out the priorities for biodiversity in Norwich to ensure development is delivering the right protections and enhancements in the right places;
- To support applicants in gaining planning permission by clearly setting out expectations for development proposals in Norwich with regard to biodiversity;
- To build knowledge around biodiversity protection and enhancement, and to explain new terminology and processes.

2.2 Following the adoption of the GNLP (March 2024), Norwich City Council will have adopted policy relating to BNG in GNLP Policy 3. This Supplementary Planning Document (SPD) is intended to supplement this policy in so far as statutory BNG applies and provides additional local information. Guidance on the full application of GNLP Policy 3 will be available in due course.

2.3 This SPD will be subject to public consultation prior to adoption. Following adoption, the SPD be a material consideration relevant to the determination of planning applications.

3. Policy Context

3.1 Protecting and enhancing biodiversity through development proposals is already a part of the [National Planning Policy Framework](#) (NPPF) but the Framework does not specify the amount of enhancement that should be provided. The Environment Act 2021 specifies that all relevant development must ensure at least 10% BNG compared with the pre-development value of the site. The government has also published numerous [statutory instruments and regulations](#) to implement the BNG requirement.

3.2 [Local Nature Recovery Strategies](#) (LNRS) were also introduced through the Environment Act 2021. These will be a spatial tool for nature recovery across England and are expected to set out key areas where there is opportunity for habitat enhancement and creation. It is expected that BNG achieved through new development will contribute to this strategic nature recovery network. Norfolk County Council have formally been appointed as the responsible body for producing an LNRS in our region and will do this jointly with Suffolk County Council. The LNRS for Norfolk and Suffolk is anticipated for completion in 2025.

3.3 The current local plan for Norwich is made up of the [Joint Core Strategy](#) (JCS) for Broadland Norwich and South Norfolk (2014), the [Norwich Site Allocation Policies Local Plan](#) (Site Allocations Plan), and the [Norwich Development Management Policies Local Plan](#) (DM Policies Plan). BNG is a new concept (see para 4.1) and is therefore not referred to in the currently adopted local plan documents. However, policy 1 of the JCS sets out that development will protect, maintain, restore and enhance environmental assets, expand and link valuable open spaces of biodiversity importance to create green links, minimise fragmentation of habitats and contribute to a multi-functional green network. Policy DM3 of the DM Policies Plan outlines that all new development will be expected to make appropriate provision to safeguard and enhance habitats and create a biodiversity-rich

environment, and policy DM6 sets out that development will be expected to avoid harm to and protect and enhance the natural environment of Norwich, including both sites and species. This demonstrates that the new BNG requirement will strengthen Norwich City Council's existing commitments to the environment.

- 3.4** Norwich City Council, along with Broadland and South Norfolk District Councils (the Greater Norwich authorities), is currently preparing [the Greater Norwich Local Plan](#) (GNLP), which is due to be adopted in March 2024. Once adopted, the GNLP will replace the JCS and the Site Allocations Plan for Norwich. Policy 3 of the GNLP sets out that development proposals will be required to conserve and enhance the natural environment through appropriate design and avoiding harm to natural assets and should have regard to delivering local green infrastructure strategies. It also sets out that at least 10% BNG must be demonstrated as part of development proposals.
- 3.5** The council is also involved in the production of several evidence studies which will help inform the delivery of BNG on development sites. The council commissioned The Norwich Biodiversity Baseline Study 2024. This is a key evidence base which sets out what the existing biodiversity baseline is in Norwich, with information on key species, and threats to biodiversity. The study outlines opportunity areas within Norwich, and includes some site specific biodiversity recommendations. The Greater Norwich authorities are also updating their Green Infrastructure (GI) Strategy. This strategy will baseline the existing GI in the Greater Norwich area and undertake an assessment of both natural and recreational places to understand if the level of GI provision is appropriate for current and future populations. The GI strategy is currently in preparation and is currently anticipated for completion by the end of 2024.

4. Biodiversity in Norwich

- 4.1** The Norwich Biodiversity Baseline Study 2024 conducted an analysis of existing species and habitat information to baseline Norwich's natural assets. Despite it being an urban environment, there are many recorded species of flora and fauna, and a good number of designated natural sites in the city.
- 4.2** 631 of the species ever recorded in Norwich are classified as species of conservation concern, which means that they are rare, threatened or protected by law. 172 of these are classed as priority species which are those of international importance or at high risk of rapid decline. 15 European protected species have also been recorded in Norwich, including great crested newt, otter and 11 species of bat.
- 4.3** 54 species of invasive species (non-native) have been recorded in Norwich including Himalayan Balsam, Giant Hogweed and Signal Crayfish. These species can impact negatively on native species by outcompeting for resources and geographic area.
- 4.4** Norwich has a good variety of habitat types. This ranges from marshes, lowland heath, lowland mixed deciduous woodland, grassland and waterbodies. Norwich also contains a variety of priority habitats, which are those identified as the most

threatened and in need of conservation action, including fen and grazing marsh in the river valleys, remnant heathland at Mousehold Heath and the rivers Wensum and Yare. Irreplaceable habitats are those which are very difficult to restore, recreate or replace, or would take a very long time to do so. These types of habitat are afforded special protection in the planning process. There are a small number of irreplaceable habitats in Norwich, including ancient woodland at Lion Wood, veteran trees, and lowland fen along the River Yare.

- 4.5** Norwich also contains many protected sites for both biodiversity and geodiversity. This includes part of the River Wensum SAC reaching into the northwest of the city, five Sites of Special Scientific Interest (SSSI), eight Local Nature Reserves (LNR), and 30 County Wildlife Sites (CWS). Figure 1 displays a summary of the natural assets in Norwich.
- 4.6** The Norwich Biodiversity Baseline Study 2024 has generated a map of “biodiversity hotspots” in Norwich. Figure 2 shows areas of the city that are considered to have the highest biodiversity value in the darker colours. Larger hotspot areas include the northern reaches of the River Wensum, the River Yare Valley and Mousehold Heath, along with some smaller hotspot areas such as around Twenty Acre Wood, Earlham Cemetery and Lion Wood.
- 4.7** The Norwich Biodiversity Baseline Study 2024 spatially represents Norwich using Biodiversity Character Areas (BCAs). The BCAs are based on a shared set of characteristics and themes and give a strategic overview of the natural environment in Norwich. Figure 3 shows the County level BCAs in Norwich, which set out those areas important at a county scale, and figure 4 shows the local level BCAs, setting out biodiversity themes of local importance.
- 4.8** The maps and information contained in Section 4 of this SPD, and within the Norwich Biodiversity Baseline Study 2024 does not take the place of on-the-ground ecological site surveys.

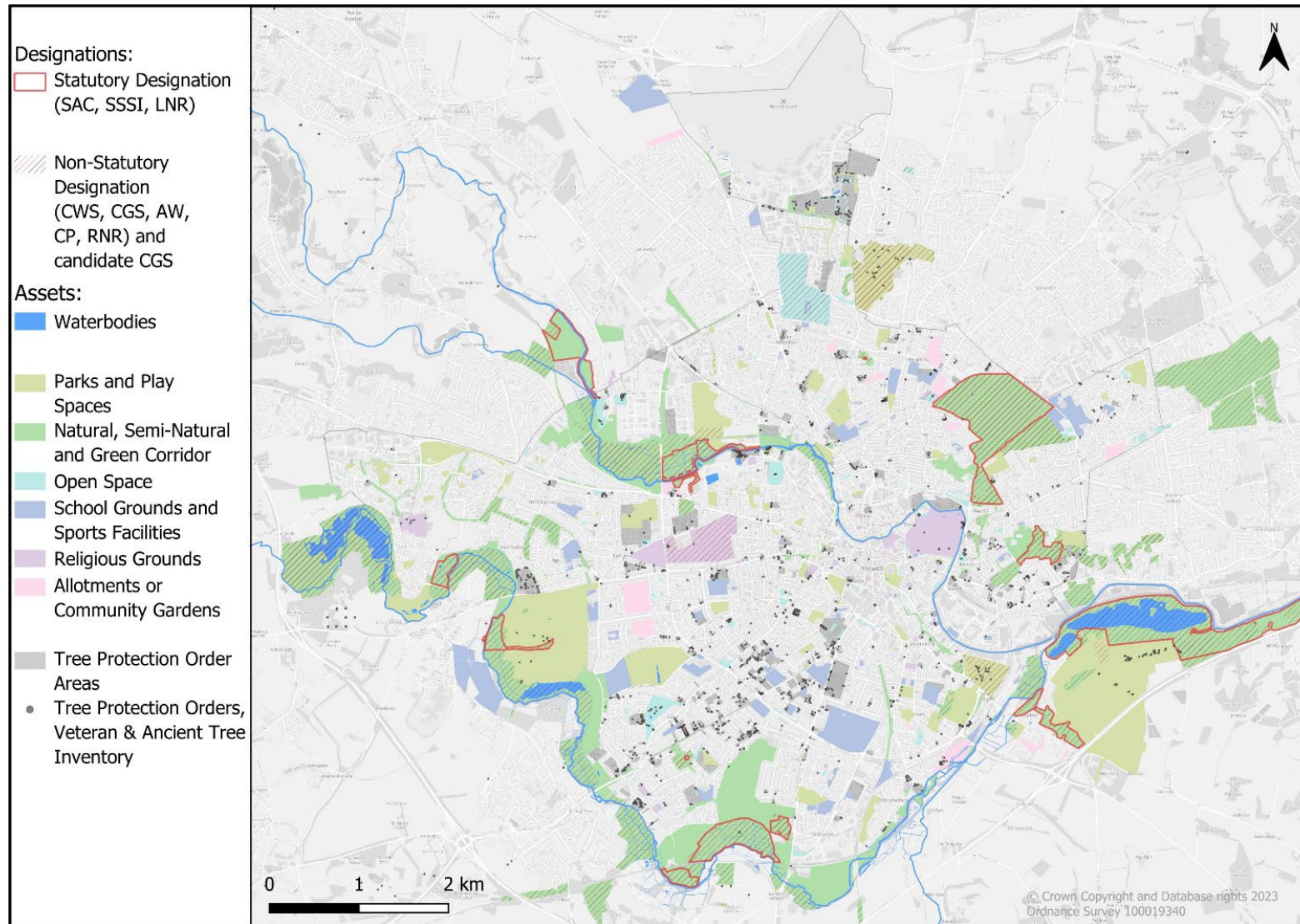


Figure 1: Natural Assets by type and designation in and around Norwich. (Please see Map 12 of the Norwich Biodiversity Baseline Study 2024 for full information).

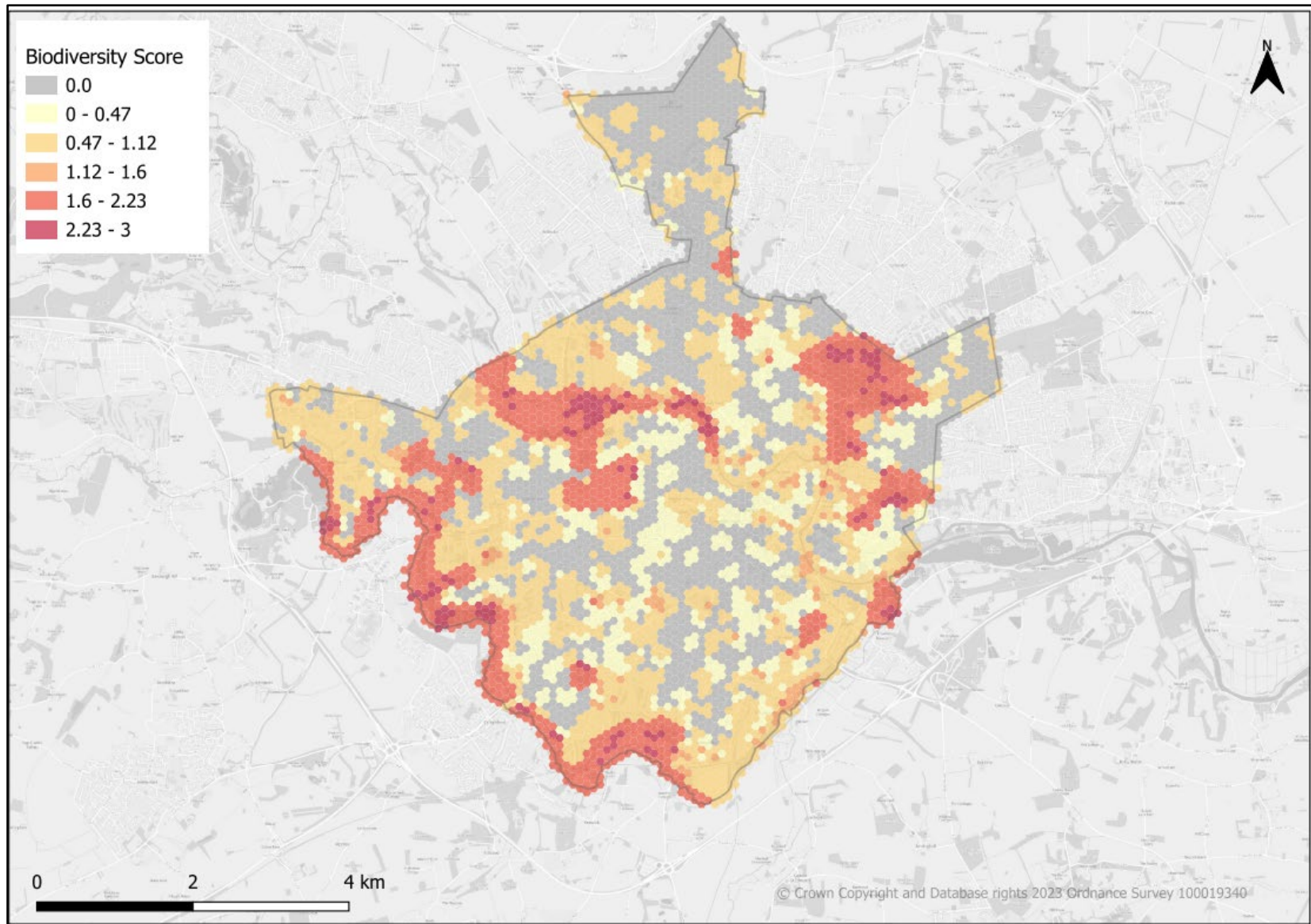


Figure 2: Biodiversity hotspot scores for Norwich. The darker red represents areas with higher scores, or biodiversity hotspots (Please see Map 15 of the Norwich Biodiversity Baseline Study 2024 for full information).

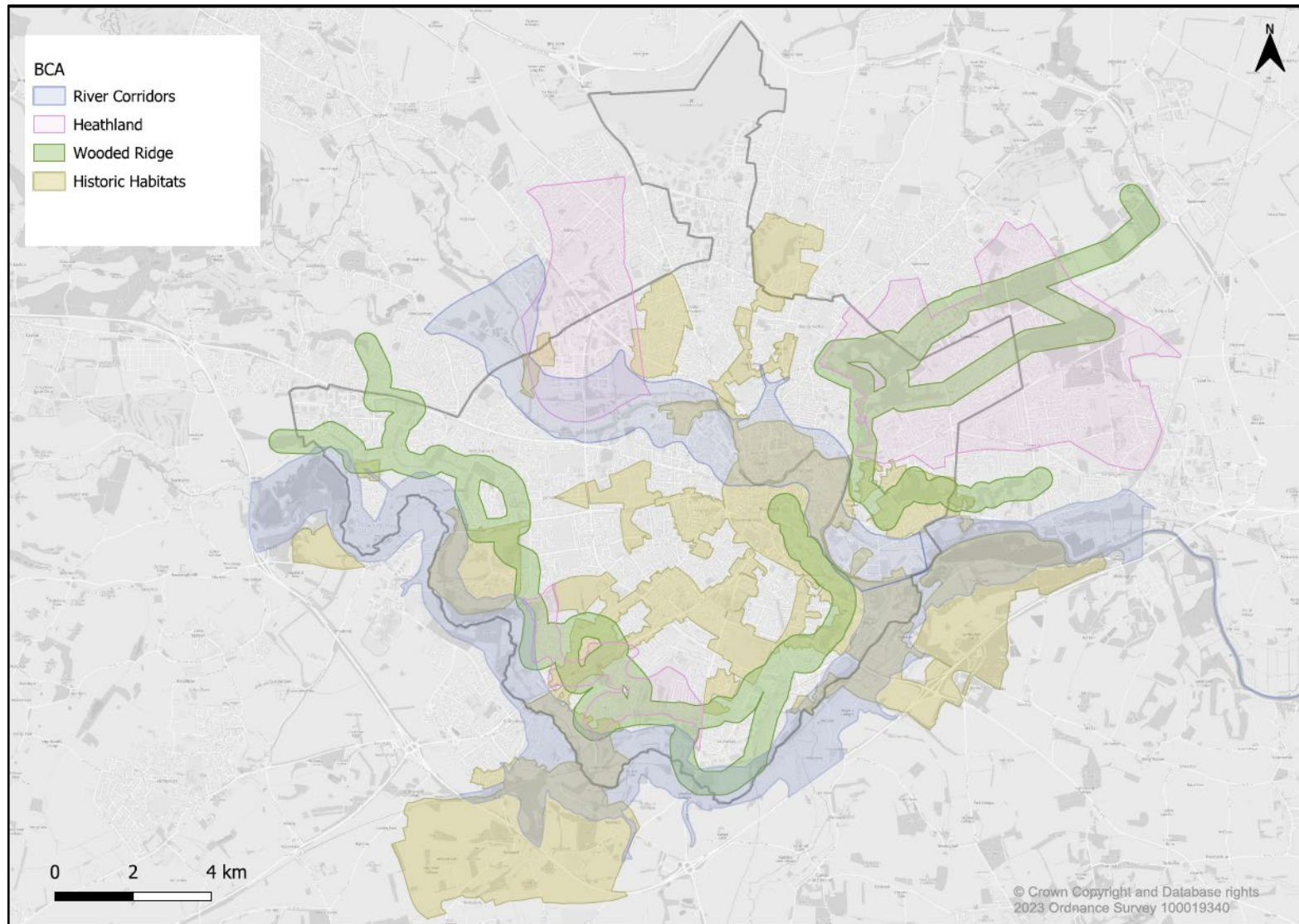


Figure 3: County level Biodiversity Character Areas in Norwich. (See Map 13 of the Norwich Biodiversity Baseline Study 2024 for full information).

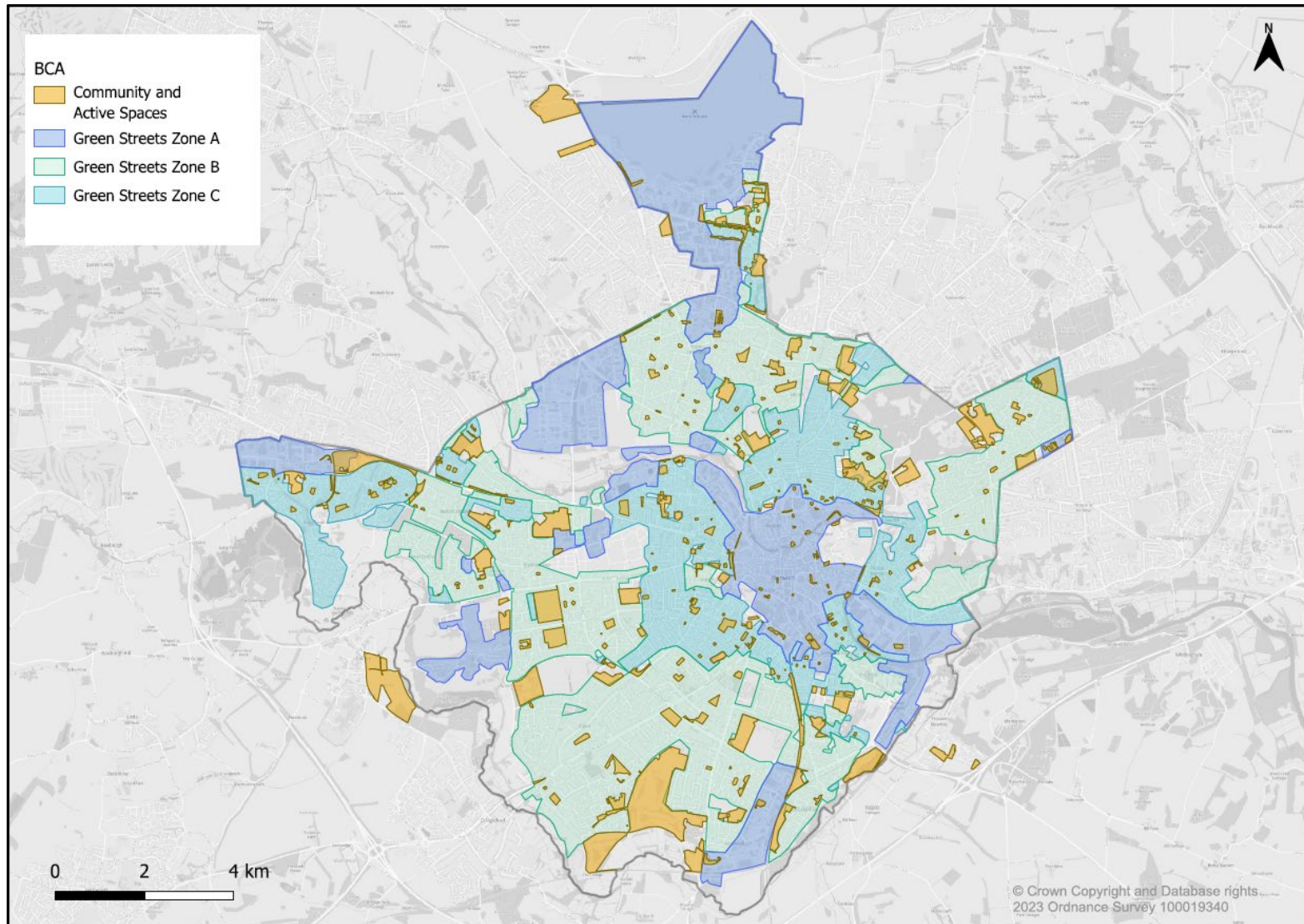


Figure 3: Local level Biodiversity Character Areas in Norwich. (See Map 14 of the Norwich Biodiversity Baseline Study 2024 for full information).

5. How much BNG is required and when?

- 5.1** Schedule 14 Part 1 of The Environment Act 2021 specifies that all grants of planning permission (apart from [exempt development](#)) in England will need to ensure the “biodiversity value attributable to the development exceeds the pre-development biodiversity value of onsite habitat by at least the relevant percentage”.

This means that relevant development must achieve at least 10% biodiversity net gain compared with the pre-development biodiversity value of the site.

- 5.2** Schedule 14 Part 2 of The Environment Act sets out that BNG will be secured on planning permissions by the imposition of a general planning condition. Therefore, all planning permissions subject to BNG will have a condition attached that specifies that:

Development may not be begun unless:

- (a) A biodiversity gain plan has been submitted to the planning authority;
and
(b) The planning authority has approved the plan.***

- 5.3** BNG applies to all major development (except exempt development) planning applications made on or after **12th February 2024**. BNG applies to all other minor development planning applications (except exempt development made on or after **2nd April 2024**).
- 5.4** Reference to ‘made’ applications in paragraph 5.3 refers to valid applications. This means that if an application is submitted prior to these dates, but does not include all required information and is therefore not considered valid until on or after these dates, then the BNG requirement will apply (unless the development/application type is exempt).
- 5.5** [The BNG Exemption Regulations](#) set out the types of development that are exempt from BNG. In addition, some development does not require planning permission. The above requirements will not apply to those development types.

6. How does BNG fit with other planning obligations?

- 6.1** New development in Norwich must consider a number of different obligations as part of the planning process. Of particular relevance to BNG are:

[Nutrient Neutrality](#) – planning permission cannot be granted for new overnight accommodation unless the local planning authority concludes that the development (through a Habitat Regulations Assessment) will not have an adverse effect on the relevant protected sites. Applicants will be required to calculate the nutrient pollution arising from their proposed development and propose suitable mitigation.

GI RAMS (*Green Infrastructure and Recreational Avoidance and Mitigation Strategy*) – new development is required to ensure that appropriate green infrastructure is provided, and that new development does not adversely impact upon Special Areas of Conservation (SACs) through increased visits to those sites. Compensatory measures have been identified in the GI RAMS towards mitigation measures which is formed of two parts 1) the payment of a tariff contribution towards the cost of mitigation measures at the protected sites, and 2) the provision or enhancement of adequate green infrastructure either on the development site or nearby to provide for informal recreational needs of residents.

6.2 These are their own separate requirements which apply to the planning application process, in addition to (and not instead of) BNG. However the government has produced [guidance](#) outlining that BNG provision can be combined with other environmental schemes and nature markets.

7. The BNG Process

7.1 Figure 5 provides a summary of BNG stages throughout the planning process. Full information on BNG in the planning process can be found in government regulations and guidance.

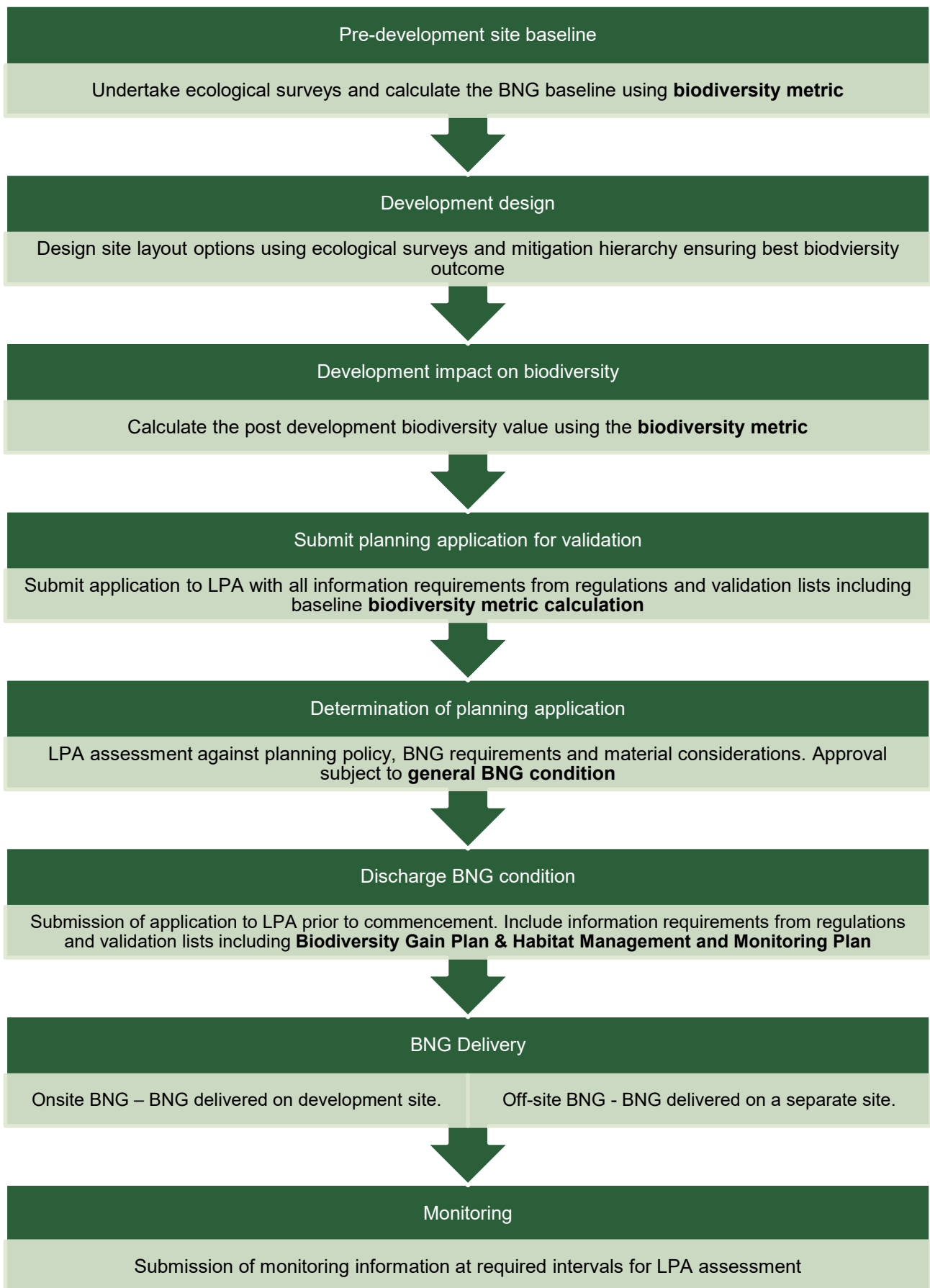


Figure 4: Summary of BNG in the planning process

8. General Principles for BNG

8.1 This section outlines some key principles for BNG in the planning process.

BNG Principles

8.2 It is strongly encouraged that new development follow the '[BNG 10 Good Practice Principles for Development](#)' in the site selection and design of BNG and be carried out in accordance with the relevant and most up to date standards and best practice, including [British Standard BS 8683:2021](#) Process for designing and implementing biodiversity net gain. Survey work to support BNG needs to consider the relevant survey seasons for different species and habitats.

Biodiversity Gain Hierarchy

8.3 The Biodiversity Gain Hierarchy sets out the order of preference of how BNG should be delivered. The hierarchy emphasises that onsite gains should be considered first, followed by registered off-site gains, and statutory biodiversity credits as a last resort. Applicants are encouraged to follow the hierarchy at the earliest stage possible, including site selection and scheme design. The LPA must take into account the Biodiversity Gain Hierarchy when considering whether the BNG objective has been met and therefore whether to discharge the general biodiversity condition.

8.4 The biodiversity gain hierarchy is distinct from the mitigation hierarchy set out in paragraph 186 of the NPPF. The NPPF mitigation hierarchy requires that harm to biodiversity resulting from development should first be avoided, then adequately mitigated, and as a last resort compensated for. Both hierarchies must be considered as part of the LPA's decision-making process.

8.5 In cases where BNG is not required (for example exempt development, or scenarios where the baseline value of the site is zero), biodiversity enhancement may still be required as part of the proposal. This is because existing planning policy requires that development should avoid harm to, protect and enhance the natural environment of Norwich, and there may be species or habitats on site that are already afforded protections through other designations.

Using the Biodiversity Metric

8.6 Biodiversity is calculated using the [Statutory Biodiversity Metric](#). The metric is a spreadsheet-based tool and calculates the value of habitats as 'biodiversity units'. There are three types of unit that are measured in the metric:

- Area habitat units
- Hedgerow units including lines of trees, and
- Watercourse units

8.7 The Biodiversity Metric should be used in line with the relevant rules, guidance and user guide. A [small sites metric](#) has also been produced for use on smaller development sites. This metric should only be used for developments that are

defined as small sites within the relevant user guide. Both metrics should be completed by a competent person, and using a suitably qualified ecologist is strongly encouraged. You must be a qualified assessor to undertake a river condition assessment.

Site Degradation

- 8.8** Applicants should be aware of the rules and regulations of site clearance, destruction, or degradation without relevant permissions prior to calculating the biodiversity baseline for a development site, set out in [The Environment Act 2021](#) (Schedule 14). The regulations set out that if this occurs then the pre-development biodiversity value of the onsite habitat is to be taken to be the biodiversity value immediately before these activities were carried out. This is to prevent degradation of a site prior to calculating the baseline to purposefully achieve a lower starting biodiversity value.

Assigning Strategic Significance for BNG

- 8.9** The Biodiversity Metric allows uplifts to calculated biodiversity units if habitats and their locations are deemed to be strategically significant. This applies to both the baseline metric calculation and the post-development calculation. Identifying when habitats and locations are strategically significant is important as it ensures that the loss of those habitats is appropriately compensated for, but also recognises the value of any newly created strategically significant habitats.
- 8.10** The [Statutory Biodiversity Metric User Guide](#) outlines that strategic significance should be determined by identifying the relevant locations formally in a locally strategy, or a LNRS if one exists. The LNRS for Norfolk and Suffolk has not yet been prepared. Therefore:

The Norwich Biodiversity Baseline Study 2024 is considered to be the relevant local strategy for the purposes of assigning strategic significance uplift unless this is superseded by more up to date evidence.

- 8.11** The Norwich Biodiversity Baseline Study 2024 has developed a methodology for assigning strategic significance uplift based on:
- Whether the site is in a county level Biodiversity Character Area (BCA)
 - Whether the habitat is a priority habitat in that BCA
 - Whether the habitat is located in an ecologically desirable location
- 8.12** When assigning strategic significance to habitat units in the biodiversity metric, applicants should use the resources from the Norwich Biodiversity Baseline Study 2024 (Appendix 1).

Engaging with Norwich City Council

8.13 It is strongly encouraged that developers and landowners looking to develop a site engage in [Norwich City Council's pre-application process](#) prior to the submission of a planning application. This could save applicants time and money, and may improve chances of development proposals being approved. This process may also be able to highlight particular biodiversity issues for consideration in a future planning application and help you to identify the most appropriate habitat types and sizes for your site.

9. What is Required to Support a Planning Application?

9.1 It is important that all the required information for a planning application is submitted upfront so that an application can be validated in good time. Failure to provide the required information will result in delays to processing applications.

9.2 National and local validation checklists can be updated at any time and therefore checking these lists directly prior to submitting your application is strongly encouraged.

9.3 For BNG, [the regulations](#) set out that the following information is required to be submitted for a planning application:

- A statement setting out whether the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition. There is a space for this on the application form;
- If the applicant believes the planning permission would not be subject to the biodiversity gain condition, a statement setting out the reason why. There is space for this on the application form.

If the planning permission, if granted, would be subject to the biodiversity gain condition the following additional information is required:

- The completed statutory biodiversity metric tool showing the calculation of the onsite biodiversity value on the date of the application or an earlier date proposed by the applicant (which must be justified and agreed with the local planning authority)¹;
- The publication date of the statutory biodiversity metric tool used to calculate the biodiversity value;
- A description of any irreplaceable habitat that is on the application site;
- A plan showing the location of the habitat used in the biodiversity metric calculations and any irreplaceable habitat.

9.4 Although not currently required to be submitted as part of a planning application by national regulations, Norwich City Council requires the submission of the following documents along with a planning application in accordance with the

¹ This date of the baseline calculation may also be immediately prior to any site degradation carried out without relevant permission. See paragraph 8.8. If any site degradation has been carried out without the relevant permission the application should also include a statement that such activities have occurred, confirmation of the date immediately before those activities were carried out and any available supporting evidence for the biodiversity value of the site on that date.

local validation list. This enables the council to review more detailed information earlier in the process, have greater confidence in the BNG measures being proposed:

- A statement providing information about the person completing the BNG metric calculation and why they are a competent person to do so.

9.5 For an application to discharge the BNG pre-commencement condition, [the regulations](#) set out that the following information is required:

- A Biodiversity Gain Plan (BGP) which should include:
 - Information about the steps taken to minimize the impact of development on onsite and any other habitat;
 - On-site pre-development biodiversity value;
 - On-site post development biodiversity value;
 - Any registered off-site gains already allocated or proposed to be allocated the development before the submission of the BGP and their biodiversity value;
 - Any statutory biodiversity credits already purchased or proposed to be purchased for the development.

It is advised to use the [biodiversity gain plan template](#).

10. On-site delivery of BNG

10.1 Delivering on-site BNG means providing habitat on the same site as the development (within the same red line boundary). Aside from avoiding adverse impacts on habitats, the biodiversity gain hierarchy requires that on-site provision of mitigation measures be considered first.

10.2 [Guidance](#) is available as to what might be considered “significant” on-site BNG. What counts as ‘significant’ BNG will vary between applications and will be determined on a case-by-case basis.

10.3 All significant on-site BNG must be secured with a legal agreement for 30 years to ensure maintenance of the enhancements. This may be via a planning condition, Section 106 obligation or conservation covenant. It is advised to use the [Natural England Habitat Management and Monitoring \(HMMP\) template](#) and associated guidance as well as other best practice guidance such as BS 8683:2021 to detail how management and monitoring will be undertaken and to submit this alongside the BGP. These documents can then be agreed as part of a legal agreement.

10.4 ‘Non-significant’ on-site BNG are enhancements that are still included in the biodiversity metric calculation but will not make a significant different to the development’s biodiversity value. Guidance is available as to what might be considered non-significant on-site BNG, however what counts as non-significant BNG will vary between applications and will be determined on a case-by-case basis.

10.5 Non-significant BNG does not need to be secured by a legal agreement for 30 years.

11. Off-site delivery of BNG

11.1 Off-site delivery of BNG is where biodiversity enhancements are provided in a location other than the development site (outside the red line boundary). There are several options for delivering off-site BNG:

- Delivering [registered off-site BNG](#);
- [Purchasing statutory biodiversity credits](#).

11.2 All off-site BNG must be secured with a legal agreement for 30 years to ensure maintenance of the enhancements. This may be via a planning condition, Section 106 obligation or conservation covenant. It is advised to use the Natural England HMMP template and associated guidance, as well as other best practice guidance such as sBS 8683:2021 to detail how management and monitoring will be undertaken and to submit this alongside the BGP. These documents can then be agreed as part of a legal agreement.

12. BNG Monitoring and Post-construction

12.1 Monitoring of BNG enhancements will be undertaken in accordance with the details approved in the BGP and HMMP. Monitoring and management of BNG enhancements will be the developer or landowners' responsibility.

12.2 Norwich City Council reserves the right to charge a fee for BNG monitoring as part of a legal agreement to ensure BNG mitigation and enhancement is being provided in accordance with the agreed BGP/HMMP.

12.3 Local Planning Authorities have a responsibility to report information on BNG secured via development. This information will be reported in accordance with [guidance on public authorities complying with the Biodiversity Duty](#).

13. Glossary

Biodiversity

The variety of all life on Earth; genus, species and ecosystems. It includes all species of animals and plants, and the natural systems that support them. The word biodiversity comes from the term “biological diversity”.

Biodiversity Net Gain

An approach to development/land management that aims to leave the natural environment in a measurably better state than it was beforehand.

County Wildlife Site

A conservation designation for areas rich in wildlife but are outside of nationally protected natural area designation.

Ecosystem

An ecosystem is all the plants and animals that live in a particular area together with the complex relationship that exist between them and their environment.

European Protected species

A group of species protected by law through the European Habitats Directive.

GI RAMS

Green Infrastructure and Recreational Avoidance and Mitigation Strategy. This sets out the requirements for planning applications to ensure that new development can provide appropriate local green infrastructure for residents and to manage and reduce the impact of visits to protected areas.

Green Infrastructure

A network of multi-functional green and blue spaces which deliver benefits to both the environment and the local community. GI includes natural green spaces, man-made managed green spaces, allotments, urban parks, designated historic landscapes. Footpaths, cycleways, green corridors, waterways, wetlands, ponds and floodplains.

Habitat

The natural home or environment of an animal, plant or other organism.

Invasive Non-Native Species (INNS)

Species that occur outside their normal geographic range due to direct or indirect introduction.

Irreplaceable Habitats

Habitats which would be technically very difficult (or would take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Ancient Woodland, unimproved grassland, and ancient hedgerows are also examples of irreplaceable habitat.

Local Nature Reserve (LNR)

A protected area of land because of its special natural interest.

Native Species

Species that are rare, threatened and protected by law that are in need of nation-wide conservation as identified by the [UK Biodiversity Action Plan](#).

Nutrient Neutrality

A means of ensuring that a plan or development does not add to the existing nutrient burdens within watercourse catchments i.e. ensuring there is no net increase in nutrients as a result of the above.

Priority Species

Species identified as being the most threatened and requiring conservation under the UK Biodiversity Action Plan (UK BAP).

Priority Habitats

Habitats identified as being the most threatened and requiring conservation under the UK Biodiversity Action Plan (UK BAP).

Special Area of Conservation (SAC)

These are sites that have been adopted by the European Commission and formally designated by the government as areas of importance to protect important species and habitats.

Species

A classification of related organisms that share common features and characteristics.

Species of conservation concern

Species that are rare, threatened and protected by law that are in need of nation-wide conservation as identified by the UK Biodiversity Action Plan.

Site of Special Scientific Interest (SSSI)

A formal designation protecting an area that is of special interest due to wildlife and geological features under the Wildlife and Countryside Act 1981.

Strategic Significance

A multiplier contained within the biodiversity metric that applies an uplift to biodiversity units. Strategic significance is determined locally through local plans and strategies, and eventually LNRS.

Appendix 1 – Strategic Significance Resources

The following resources have been extracted from the Norwich Biodiversity Baseline Study 2024. For full information please see the baseline report.

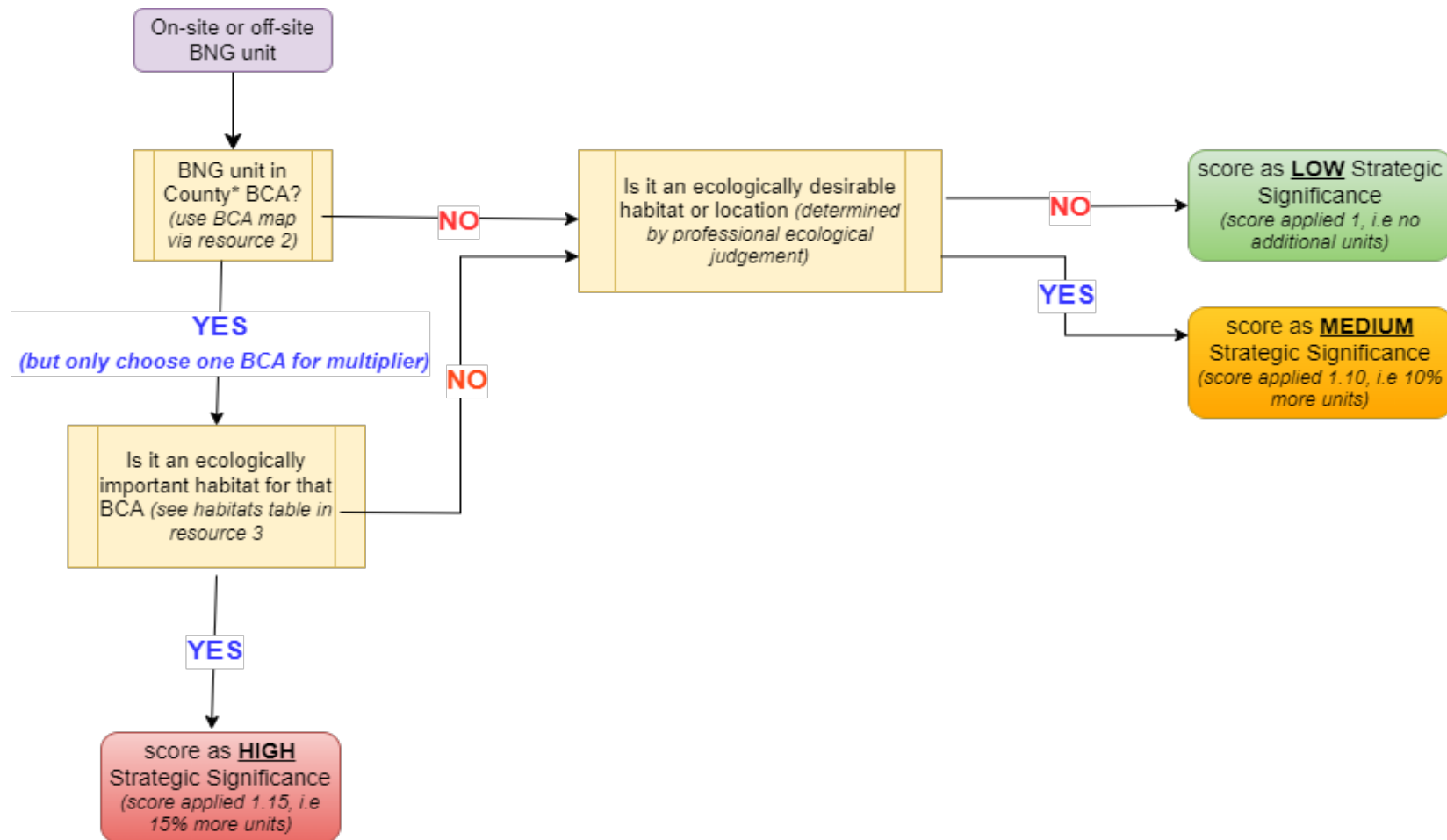
Resource 1 - a decision tree to help determine whether units are given high, medium or low strategic significance uplift. This resource includes four worked scenarios.

Resource 2 - provides signposting to each County Biodiversity Character Area (BCA) boundary map within Norwich. (Norwich BBS Appendix BBS6 – Layered PDFs and Figure 3 of this report).

Resource 3 -provides a list of habitats that are eligible for uplift.

These resources are designed to be used in conjunction with each other, to collectively provide the information needed for decision making.

Resource 1: Decision Tree for Assigning Strategic Significance



Resource 1: Decision tree for deciding how to assess units for potential Strategic Significance uplift. BNG units refer to biodiversity units that are on-site or off-site and pre and post development. Note: uplifts are applied automatically in the metric once strategic significance has been entered.

* Based on expert ecological opinion (authors of The Norwich Biodiversity Baseline Study 2024) Local BCAs are not considered applicable for uplift due to their wide geographic coverage and numerous, isolated sites.

Example scenarios:

Using the above decision tree (Resource 1) and the County BCA Map (Resource 2) and Habitats table (Resource 3), four scenarios are worked through below, to show how the resources should be used together and how the decision tree can be used to decide on uplift scoring. The example scenarios are intended to be illustrative rather than comprehensive or site specific.

Scenario 1: Planting of what will become Lowland Mixed Deciduous Woodland within the Wooded Ridge County BCA.

Decision tree: Is the habitat in County BCA? Yes. Is the habitat ecologically important and identified for the BCA in Table 1? Yes.

Result: Assign **high** strategic significance score.

Scenario 2: Planting of what will become Lowland Mixed Deciduous Woodland within the Green Streets Local BCA. The woodland will fill in a gap as part of a woodland stepping-stone corridor.

Decision tree: Is the habitat in County BCA? No. Is it an ecologically desirable habitat or location (determined by professional ecological judgement)? Yes.

Result: Assign **medium** strategic significance score.

Scenario 3: Creation of what will become Lowland Meadow grassland within the Heathland County BCA. The meadow will connect up with other meadows sites in proximity.

Decision tree: Is the habitat in County BCA? Yes. Is the habitat ecologically important and identified for the BCA in Table 1? No. Is it an ecologically desirable habitat or location (determined by professional ecological judgement)? Yes

Result: Assign **medium** strategic significance score.

Scenario 4: Planting of what will become Lowland Mixed Deciduous Woodland within the Green Streets Local BCA. The woodland will be isolated from other woodland habitat.

Decision tree: Is the habitat in County BCA? No. Is it an ecologically desirable habitat or location (determined by professional ecological judgement)? No.

Result: Assign **low** strategic significance score.

Resource 2: Sign posting to County BCA Boundary Maps

To identify the boundaries of each of the four County BCAs (River Corridors BCA, Wooded Ridge BCA, Heathland BCA and Historic Habitats BCA) where sites are eligible for uplift, boundary maps showing the spatial extent of each area are provided as layered PDFs in the BBS Appendix BBS6.

Resource 3: Table of habitats and habitat features eligible for uplift

Resource 3 is a table of habitats and habitat features eligible for uplift, to be used in conjunction with both the decision tree (Resource 1) and County BCA boundary maps (Resource 2).

This table provides a list of habitats and habitat features that are ecologically important in each BCA and informs whether a strategic significance uplift can be applied. If sufficient ecological evidence is provided, other habitats or habitat feature not listed in the table may be eligible in the relevant BCA and therefore could also be eligible for uplift.

Resource 3 can also be used for the identification of Medium Strategic Significance uplift, as can the Biodiversity Hotspots Map in the BBS Appendix BBS6 but professional ecological judgement is needed to apply these as sources of evidence. All habitats and habitat features listed are appropriate for creation or restoration to implement net gain actions, unless specifically stated.

Resource 3: Table of habitats and habitat features eligible for uplift

Eligible habitats and habitat features for High Strategic Significance BNG uplift or potentially to be used for Medium Strategic Significance BNG uplift, where professional judgement applied.

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
River Corridors	Priority Habitat standing water or ponds	'Lakes - Ponds (priority habitat)'		Ghost ponds, i.e., restoration of ponds which contain an old seed bank, and are shown on historic OS mapping, such as 1st editions.
	Native hedgerows	All 'Native Hedgerow' and 'Ecologically valuable line of trees' categories, plus 'Line of trees - associated with bank or ditch' if ecologically appropriate	Only if ecologically appropriate location	Tussocky grass or scrub border (as linear features for birds e.g., barn owl/bats etc)
	Wet Woodland	'Woodland and forest - Wet woodland'		
	Dense scrub	'Heathland and shrub - Blackthorn scrub', or 'Heathland and shrub - Bramble scrub', or 'Heathland and shrub - Gorse scrub', or 'Heathland and shrub - Hawthorn scrub', or 'Heathland and shrub - Hazel scrub', or 'Heathland and shrub - Mixed scrub', or 'Heathland and shrub - Willow scrub'	Species-rich/ecologically valuable. Acceptable only in marginal stands or island refuges.	
	Lowland Calcareous Grassland	'Grassland - Lowland calcareous grassland'	Wet or seasonally wet	

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
	Purple Moor-grass and Rush Pastures within marshes*	'Wetland - Purple moor grass and rush pastures'*		
	Lowland Fens [^]	'Wetland - Fens (upland and lowland)' [^]		
	Reedbeds	'Wetland - Reedbeds'		
	Coastal and Floodplain Grazing Marsh	'Grassland - Floodplain wetland mosaic and CFGM'	Appropriate water levels	
	Lowland dry Acid Grassland (including if seasonally wet)	'Grassland - Lowland dry acid grassland' OR 'Grassland - Other lowland acid grassland' - including if seasonally wet	On edges of wetland habitats as part of an ecotone from neutral to acid	
	Lowland Meadows	'Grassland - Lowland meadows' OR 'Grassland - Other neutral grassland'	Wet or seasonally wet	
	Rivers*	Watercourse categories: 'Priority habitat*', 'Other rivers and streams*', and 'Ditches' if ecologically appropriate		
Heathland	Priority Habitat standing water or ponds	'Lakes - Ponds (priority habitat)'		Ghost ponds, i.e., restoration of ponds which contain an old seed bank, and are shown on historic OS mapping, such as 1st editions.
	Lowland dry Acid Grassland	'Grassland - Lowland dry acid grassland' OR 'Grassland - Other lowland acid grassland'		

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
BCA	Lowland Mixed Deciduous Woodland	'Woodland and forest - Lowland mixed deciduous woodland'; OR 'Woodland and forest - Other woodland; broadleaved' or 'Woodland and forest - Other woodland; mixed' if ecologically appropriate	Only if extending woodland at Mousehold Heath, without reducing area of heathland/acid grassland. No other locations applicable.	
	Lowland Heathland	'Heathland and shrub - Lowland heathland'		
Wooded Ridge	Priority Habitat standing water or ponds	'Lakes - Ponds (priority habitat)'		Ghost ponds, i.e., restoration of ponds which contain an old seed bank, and are shown on historic OS mapping, such as 1st editions.
	Native hedgerows	All 'Native Hedgerow' and 'Ecologically valuable line of trees' categories, plus 'Line of trees - associated with bank or ditch' if ecologically appropriate		
	Lowland Mixed Deciduous Woodland	Woodland and forest - Lowland mixed deciduous woodland'; OR 'Woodland and forest - Other woodland; broadleaved' or 'Woodland and forest - Other woodland; mixed' if ecologically appropriate.		
	Ancient Woodland [^]	Ancient Woodland [^]	Restoration and enhancement only	
	Wet Woodland	'Woodland and forest - Wet woodland'		

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
	Dense scrub	'Heathland and shrub - Blackthorn scrub', or 'Heathland and shrub - Bramble scrub', or 'Heathland and shrub - Gorse scrub', or 'Heathland and shrub - Hawthorn scrub', or 'Heathland and shrub - Hazel scrub', or 'Heathland and shrub - Mixed scrub', or 'Heathland and shrub - Willow scrub'	Species-rich/ecologically valuable. Only if ecologically appropriately located	
	Traditional Orchards	'Grassland - Traditional orchards'		
	Lowland Calcareous Grassland	'Grassland - Lowland calcareous grassland'	As glade meadows only	
	Lowland Meadows	'Grassland - Lowland meadows' OR 'Grassland - Other neutral grassland'	As glade meadows only	
	Lowland dry Acid Grassland	'Grassland - Lowland dry acid grassland' OR 'Grassland - Other lowland acid grassland'	As glade meadows only	
Historic Habitats	Priority Habitat standing water or ponds	'Lakes - Ponds (priority habitat)'		Ghost ponds, i.e., restoration of ponds which contain an old seed bank, and are shown on historic OS mapping, such as 1st editions.
	Native hedgerows	All 'Native Hedgerow' and 'Ecologically valuable line of trees' categories, plus 'Line of trees - associated with bank or ditch' if ecologically appropriate		Tussocky grass or scrub border (as linear features for birds e.g., barn owl/bats etc)

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
	Lowland dry Acid Grassland\$	'Grassland - Lowland dry acid grassland'\$ OR 'Grassland - Other lowland acid grassland'\$		
	Wood-pasture and Parkland	'Woodland and forest - Wood-pasture and parkland'	Restoration and enhancement only	Extensive restoration of open grown trees - managed by pollarding and/or significant amounts of dead and decaying timber may be acceptable in combination with other features such as veteran trees
	Ancient and Veteran Trees^	'Individual trees - Urban tree' or 'Individual trees - Rural tree' ONLY if Ancient or Veteran^	Maintenance of good condition through appropriate tree management	
	Dense scrub	'Heathland and shrub - Blackthorn scrub', or 'Heathland and shrub - Bramble scrub', or 'Heathland and shrub - Gorse scrub', or 'Heathland and shrub - Hawthorn scrub', or 'Heathland and shrub - Hazel scrub', or 'Heathland and shrub - Mixed scrub', or 'Heathland and shrub - Willow scrub'	Species-rich/ecologically valuable. Rarely acceptable in this BCA unless in small managed patches connecting woodland or on boundary of the site.	
	Lowland Calcareous Grassland\$	'Grassland - Lowland calcareous grassland'\$		
	Lowland Heathland\$	'Heathland and shrub - Lowland heathland'\$		

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
	Open Mosaic Habitats on Previously Developed Land*	'Urban - Open mosaic habitats on previously developed land'*		
	Lowland Meadows\$	'Grassland - Lowland meadows' OR 'Grassland - Other neutral grassland'\$		
	Traditional Orchards*	'Grassland - Traditional orchards'*	Restoration and enhancement only	
All habitats/habitat features listed are appropriate for creation or restoration to implement net gain actions, unless specifically stated.				
¹ = Required attributes = Listed habitats or habitat features are not acceptable for uplift unless adhering to or containing these required attributes.				
² = Preferable attributes = Listed habitats or habitat features are more likely to be acceptable as uplift with these attributes, but they are not required.				
* = Unlikely but acceptable if other features present. e.g., veteran trees in Historic Wildlife Refuges.				
\$ = Grazed if in parkland or grazed/other appropriate management such as hay cut in other historic settings such as churchyards.				
^ = Irreplaceable Habitat as defined in BNG regulations and NPPF.				
All habitats listed under Historic Wildlife Refuges BCA must be within a historic setting and this may include the restoration of remnant wood-pasture or parkland in designed landscapes/ medieval parks - especially where veteran trees survive.				
If a site where BNG units are being assessed is within more than one BCA, as long as the proposed habitats are important to that BCA, as detailed in this table, any BCA can be used for uplift. Preference should be given to the option that provides the most locally appropriate and beneficial impact for nature recovery. Sites within multiple BCAs will only count once for uplift – no double counting of the multiplier is allowed.				

Executive Summary

Section 1: Introduction

This report has been commissioned by Norwich City Council (Norwich CC) to provide a baseline assessment of biodiversity in the city. Its purpose is to identify the factors threatening it and to present prioritised opportunities for enhancement. The Norwich Biodiversity Baseline Study (BBS) has also provided an evidence base to produce a framework for ongoing biodiversity survey and monitoring and presents information that can be used to inform Biodiversity Net Gain (BNG) guidance and Supplementary Planning Documents (SPD).

Section 2: Results from Data Gathering and Gaps Identification

In this section, gaps in species, sites, and habitat data in Norwich have been identified. While the BBS provides a valid baseline assessment for the city, there is a limited to moderate impact from gaps in data currency and resolution. The Norwich Biodiversity Baseline Study Annex 1 Survey and Monitoring Framework provides methods to address these gaps going forward. Much of the species' data held consists of ad hoc records rather than structured long-term surveillance and monitoring. This has resulted in a disparity in recorder effort across the study area, which in turn can lead to difficulties in calculating species richness, due to differences in how well each area is recorded. Site data, whilst spatially comprehensive, is often outdated. Additionally, whilst two main habitat datasets are available, these suffer from a lack of ground truthing. Mapping indicative of recorder effort across Norwich reveals many areas have no recording, whilst there are medium -high concentrations of records in a small number of locations, associated with areas of semi-natural habitat renowned for their wildlife. This said, these gaps are consistent with most other local authority areas in England and so provide an acceptable level of information to make informed decisions within the rest of the BBS.

Section 3: Natural Assets

Norwich contains a wealth of species (including protected and priority species), statutory and non-statutory designated sites and a variety of different habitats. Three out of five SSSIs in Norwich are in 'favourable' or 'unfavourable recovering' condition. 83% of County Wildlife Sites (CWS) and County Geodiversity Sites (CGS) are in positive conservation management, and 41% of CWS are in 'favourable' or 'recovering' condition. Norwich contains areas of 'irreplaceable habitat' – that is, habitat that if lost can never be replaced with habitat of the same value. These are the areas of Ancient Woodland, Ancient and Veteran Trees, and Lowland Fen.

Section 4: Biodiversity Character Areas (BCAs)

BCAs have been identified to enable a more strategic approach to identifying opportunities, by considering them in context to the wider environment. There are four key BCAs within Norwich that hold strategic importance at a county scale, which can be summarised as follows:

- The **River Corridors BCA** is defined by the wider floodplain/river valley boundaries around the Yare and Wensum, encompassing a diverse range of wetland habitats in addition to the rivers themselves.
- The **Heathland BCA** identifies significant remnants of heathland and acid-grassland across the city, along with wider historic extents.
- The **Wooded Ridge BCA** shows two distinct areas of broadleaved woodland on chalk escarpments which cover large areas of the south and east of the city.
- The **Historic Habitats BCA** underscores the importance of historic parks and churchyards to biodiversity within the city centre, characterised by fragments of ancient meadows or parkland.

There are two additional BCAs identified as locally important that represent thematic areas which are most relevant to an urban environment like Norwich:

- The **Green Streets BCA** divides the residential and commercial gardens and street trees within the city into three characteristic zones (commercial, detached/semi-detached housing, terraced/communal flats), each with differing biodiversity value and opportunities.
- The **Community and Active Spaces BCA** recognises the importance of other amenity sites within Norwich, which may offer both biodiversity value and wellbeing benefits to residents.

In many places the BCAs inevitably overlap, highlighting the competing priorities in many parts of the city, where areas may hold significance for multiple habitats. Defined boundaries can also extend beyond Norwich City, representing broader connectivity with the surrounding districts.

Section 5: Biodiversity Hotspots

Biodiversity hotspots integrate species, sites, and habitat data into a heatmap, revealing areas within Norwich with the highest biodiversity value.

The River Yare Corridor exhibits the highest biodiversity values and highest number of axiophytes, thanks to its considerable extent of priority habitats. The Wensum corridor in contrast has a comparatively lower biodiversity value; although it is rich in axiophyte species in the upper reaches, the urban floodplain within the city centre exhibits lower biodiversity. This highlights the importance of ecological actions in these urban sections of the corridor.

The Wooded Ridge also has a high biodiversity value, as does the Heathland BCA, though this is primarily due to the ecological significance of Mousehold Heath, as the wider historic heathland extent has been found to score relatively lower in many areas.

Regions with greater historical continuity (e.g., parts of the wooded ridge containing Lion Wood, historic parklands and churchyards) displayed higher biodiversity values than even some present-day designated sites, highlighting the ecological value inherent to minimally disturbed legacy ecosystems.

Section 6: Strategic Significance

This section outlines the application of the BCAs devised in this study, to identify areas of strategic significance for uplift under mandatory Biodiversity Net Gain (BNG). It supports the interpretation of BNG guidance and the development of Supplementary Planning Guidance, through the provision of three resources to aid decision making: a decision tree to identify strategic significance scores; definitions of strategic significance levels within the Norwich context; and a table of habitats and habitat features eligible for uplift.

Section 7: Threats

Threats are widespread across all BCAs and decision-making must balance diverse interests, not just biodiversity. There are also data gaps in the evidence base that could limit the proactive decision-making in the development of conservation actions. The overarching impact of climate change also brings intensifying threats by altering habitats, conditions, and ecosystem balances across all BCA types. Each area additionally faces localised threats:

- **River corridors** must contend with risks such as water pollution, water abstraction and agricultural runoff. Siltation and channelisation alter natural waterway habitats and structure while invasive species (e.g. American Signal Crayfish) displace native species.
- **Heathlands** face shrinking habitat areas leading to aggravated ecological isolation and fragmentation. Air pollution from surrounding regions can cause damage to fragile lichen communities whilst light pollution disrupts the natural nocturnal and breeding behaviours in bat species.
- **Wooded habitats** experience loss of habitat features including dead, aged, mature trees that are good nesting sites for a range of species. Management currently focuses on health, safety, and fire risks but is presently under-resourced for ecologically sensitive management. This leads to regeneration and domination of invasive tree species, and larger trees, leading to a single-age structure which is more vulnerable to damage and disease. Management decisions can also lead to a loss of transitional woodland edge habitat and diverse glades which are important for species richness.
- **Historic habitats** are impacted by the effects of modernisation, including changes in management practices shifting from grazing to mowing. The loss of old structures diminishes niches for wildlife, and urbanisation in the surrounding city leads to increased air pollution. Vulnerability to tree diseases and pests and climate change is also heightened given the recovery time for mature trees.
- **Community sites** face conflicting choices between maintaining vegetation for safety versus biodiversity. Anti-social behaviours such as littering, off-trail use, and vandalism also pose direct threats by degrading habitats and disrupting wildlife.
- **Green city streets** contain limited green space as artificial surfaces and private land are prevalent. This can make it difficult to identify areas to enhance connectivity between isolated green spaces.

This report shows there is a strong relationship between threats and how they can be re-framed to provide opportunities for biodiversity enhancement.

Section 8: Opportunities

City-wide opportunities include encouraging actions and behaviour changes that benefit biodiversity through engagement; using planning design principles for biodiversity, and considering actions through BNG, DLL, implementing SuDS and creating B-Lines to support pollinators. The opportunities presented here are for all stakeholders and partners and subject to feasibility assessment and review.

- For the **River Corridors BCA**, specific opportunities lie in fully coordinating management between marshland sites to restore and create wetlands and floodplains along the rivers Wensum and Yare. This includes opening up canopies, maintaining water levels, creating/restoring ditches/ponds/drains, and, where possible, reverting agricultural land to semi-natural wetland habitat.
- The **Wooded Ridge BCA** presents chances to improve habitat quality and address the threats that arise from a lack of diverse age structure and the loss of glades and transitional edge habitats. These can be avoided through management practices that mimic natural processes, such as opening the canopy, coppicing, haloing, and selective thinning of vegetation. Aside from improving woodland, there is scope to expand woodland, and council-owned land in proximity to woodland sites should be investigated for expanding tree canopy cover.
- For the **Heathland BCA**, priority should be to maintain the favourable condition of Mousehold Heath while identifying potential areas to connect/extend heathland long-term via restored or created acid grasslands on suitable acidic soils. There is also a strong possibility that plant species of the past, many of which are rare and protected today, could be restored by re-excavating ghost ponds and exposing the historic seedbank.
- For **Historic Habitats BCA**, the priority is to maintain important historic sites, habitats, and species niches. Grassland should be managed, where possible with a shift to a 'conservation cut' and focus should be protecting mature and veteran trees, and the species that depend on them (e.g., bats). Installing bat-friendly lighting across the city would reduce wildlife disturbances and mortality.
- In both **Historic Habitats and Community and Active Spaces BCAs** there are opportunities to expand these wildlife refuges, looking into the feasibility of allocating 10% of green spaces as biodiversity assets, where appropriate, creating wildlife ponds, tiny forests, pollinator areas, orchards, and community gardens. This includes historic sites such as churchyards and gardens but more specifically the larger parks, golf courses, and school playing fields.
- For the **Green Streets BCA**, opportunities lie in adjusting road verge maintenance regimes to help connectivity. Green and brown roofs on buildings present an opportunity to integrate nature into urban infrastructure, benefiting pollinators and bird life. Engaging residents in wildlife-friendly practices would also be beneficial.

Section 9: Survey and Monitoring Framework

This section describes the rationale behind the creation of a Survey and Monitoring Framework (Norwich Biodiversity Baseline Study Annex 1 Survey and Monitoring Framework), including details of the framework's purpose, structure and intended use. The Framework outlines approaches to address local gaps in biodiversity data, monitor

biodiversity change and measure conservation success through the creation and delivery of a Survey and Monitoring Programme across Norwich. It has been written so that it can be used as a standalone document for relevant practitioners or appraised at the relevant points when reading the BBS, and when putting together feasibility studies or a review of next steps for integrating these outputs into the Biodiversity Strategy and wider policies and plans.

A variety of surveys are suggested, based on the identified needs from gaps analysis, a review of existing survey and monitoring methods, and the survey and monitoring required to support the delivery of opportunities and recommendations outlined in the BBS.

Section 10: Recommendations

This section makes detailed recommendations for Norwich CC, and its relevant partners and associated stakeholders, to take forward regarding opportunities identified.

Recommendations resulting from the BBS are grouped in themes and summarised as:

- **Governance:** Update relevant Norwich CC strategies in their next reviews to align with the actions and priorities outlined in this report. Consider recruiting staff to coordinate the implementation of the report's findings and review data/opportunities during the 5-year reporting periods.
- **Planning:** Conduct training sessions on the outcomes of this study and include biodiversity actions in planning processes that dovetail with the Green Infrastructure Strategy and explore the possibility of a green living roofs strategy. Use the BCA details as evidence for BNG guidance and strategic uplift considerations and look into supporting the development of a Supplementary Planning Document (SPD) for biodiversity.
- **Land Management:** Maximise the use of conservation cut regimes when managing areas, and balance biodiversity and safety needs by opening canopies, managing scrub, etc. Review areas in BCAs such as parks and open spaces for natural assets like tree planting, wildflower meadows and ponds, aiming for 10% of the communal area to be managed for wildlife (where appropriate and possible). Protect priority species and habitats as a minimum requirement, by, for example, creating a bat protection strategy with focus on underground and old building (churches etc) roosts. Focus on opportunities that restore habitats that have been lost and reconnect up ecological networks, particularly along the river corridors, heathland/acid grassland and parklands.
- **Wider Engagement:** Investigate establishing a full engagement programme of key messages and targeted activities. Continue engagement started within the development of the BBS, with a view to fostering community buy-in and a sense of ownership towards the opportunities identified and recommendations made.

Further recommendations related to Survey and Monitoring consist of:

- **Survey & Monitoring:** Conduct feasibility studies on the identified survey and monitoring priorities, assigning goals connected to biodiversity indicators and utilising groups for site input while budgeting for actions.
- **Species:** Target recording improvements for rare species and under-recorded groups across sites with low current effort. Encourage long-term monitoring and

utilise improved indicator lists over time and ensure this data is captured by boosting guidance on data submission to NBIS.

- **Sites & Habitats:** Incorporate forthcoming Ancient Woodland Inventory updates into an updated baseline, extract relevant site details from management plans, use historic habitat mapping datasets, and ground truth new LNRS habitat maps with targeted field surveys to provide more detail.

Recommendations identified for NBIS:

- **NBIS:** Source and collate records not currently in the NBIS database. Coordinate records data flow, and work with species experts where possible.

Section 11: Further Developments of the Study

The section suggests **next steps or further developments** under each stage of the production of this study, including:

- **Baseline data collection and presentation:** Including conducting periodic updates to address data gaps incorporating any new datasets (e.g., NBN Atlas, Ancient Woodland Inventory) and make updates according to changes in legislative definitions and designations.
- **Further analysis and interpretation of data:** Including engaging with the LNRS process where there are opportunities to incorporate more detailed mapping, considering statistical methods to remove the influence of recording effort on species mapping, and considering detailed analysis of other threats to biodiversity such as climate change.
- **Prioritisation scoring of opportunities:** Including conducting a periodic review of priorities within the context of Norwich CC's and partners resource availability and priorities.
- **Feasibility assessments and creating an action plan:** Including conducting feasibility studies and cost-benefit analyses to narrow down biodiversity conservation actions based on funding and timescales, and piloting actions before wider rollout. Refining prioritisations could also involve examining relationships between biodiversity value and socioeconomic factors across the city.

Section 12: Conclusions

This study demonstrates that Norwich City has important natural assets, supporting a wide range of species including those identified as priority and protected. The city also supports a number of priority habitats including, heathland, woodland, rivers and ponds and has 44 designated sites with a biodiversity focus.

The priority is that existing natural assets are protected first and foremost, bringing as many into favourable condition by 2030 as possible. In addition to this, focus should also be on expanding and connecting these sites before creating new isolated sites. This essentially follows [Lawton, 2010](#)'s suggestion of how to implement the Lawton Principles via a hierarchy in order of priority: Better; Bigger; More; enhance connectivity; create new corridors.

Through assessing the existing data and information, it has been concluded that there are gaps in the evidence base that impact the baseline. The survey and monitoring report

produced as part of this study includes recommendations on how these gaps can be addressed, and how a programme of survey and monitoring can be established to assess changes in biodiversity and monitor conservation success.

General and specific threats to biodiversity across the city have been identified along with many opportunities to address these threats and to enhance the city's natural assets. This has been done through the development of Biodiversity Character Areas which enable strategic planning and resource allocation and work alongside the prioritised lists of opportunities and threats identified.

This study is a baseline and so does not have an action plan as one of the outputs. As such, delivery requires further decisions to be made by Norwich CC and other stakeholders to review these opportunities, through the appropriate consideration of, for example, feasibility studies, cost-benefit analyses, policy prioritisation and resourcing implications.

Equality Impact Assessment

What is being assessed	Draft Biodiversity Net Gain Supplementary Planning Document	Status	First assessment of new proposal
Officer completing	Charlotte Rivett	Role	Planner (Policy)
Team	Planning Policy	Directorate	Planning and Regulatory Services
Senior leadership team sponsor	Sarah Ashurst	Role	Head of Planning and Regulatory Services

What are the main aims or purpose of the policy, practice, service or function? *(include links to project briefs, cabinet reports etc)*

The main purposes of the Biodiversity Net Gain (BNG) Supplementary Planning Document (SPD) are:

- To support the implementation of national regulations and policy
- Support local policy in the soon to be adopted Greater Norwich Local Plan (GNLP)
- Build on best practice guidance
- Set out the priorities for biodiversity in Norwich to ensure development is delivering the right enhancements in the right places
- To support applicants in gaining planning permission by setting out the council's expectations.

How does it fit with other services and policies, and how does it support our [corporate objectives](#) and [City Vision](#)?

This report meets the Norwich is a sustainable and healthy city corporate priority.

This report addresses the following priorities within the Corporate Plan: reduce carbon emissions, protect the environment and adapt to climate change; and protect and invest in our parks, green spaces and biodiversity.

This report helps to meet the strategic objectives of the [Biodiversity Strategy 2022-2032](#), and multiple actions from the Biodiversity Development Plan.

What is the reason for the proposal or change (financial, legal etc)? *The Equality Act requires us to make this clear.*

BNG is now a mandatory requirement under The Environment Act 2021. There is no requirement to produce a BNG SPD, however, the council routinely does this for planning policy matters where additional evidence, information and advice can be useful to both applicants and decision makers in submitting and determining planning applications.

Equality Impact Assessment

Public consultation on draft SPDs is required as set out in national regulations and the council's Statement of Community Involvement. This EqlA will be revisited as part of planning for the consultation.

Who implements, carries out or delivers the policy, practice, service or function? *(person/team/body and other organisations who deliver under procurement or partnership arrangements)*

The planning team at Norwich City Council are responsible for writing the SPD, undertaking public consultation, and reporting recommendations to elected members. Elected members (Cabinet) are responsible for the adoption of the guidance note.

What outcomes do we want to achieve, why and for who?

The SPD is aiming to provide clarity and information on BNG in the planning process for applicants and council planners, so that it is clear what the council's expectations are in relation to achieving biodiversity enhancements from planning applications. The SPD is also aiming to achieve the greatest biodiversity benefits for Norwich by providing information on where biodiversity mitigation and enhancements would be best directed.

Will anyone be disproportionately affected by the programme, and/or will it create any benefits? *(customers, employees, groups in the wider community etc)*

The production of the BNG SPD is unlikely to disproportionately affect anyone as it applies across the whole of the Norwich area. In addition, the SPD is not relevant to a specific group of people, but will apply to any relevant planning applications, and there are no limitations on who can submit such applications. As part of the determination of planning applications, the local planning authority is required to have due regard to equality and diversity issues under the Equality Act 2010.

If yes, complete the relevant sections below for any benefits and adverse impacts identified.

Affected group	Key findings from analysis of data and evidence. Identify any gaps in data here	Level & type of impact: low/medium/high, positive/adverse	Justifiable if adverse	Actions to mitigate impacts, maximise benefits or address identified gaps in data	By when
Age	N/A	No impact identified	N/A	N/A	N/A
Disability	N/A	No impact identified	N/A	N/A	N/A

Gender reassignment	N/A	No impact identified	N/A	N/A	N/A
Marriage and civil partnership	N/A	No impact identified	N/A	N/A	N/A
Pregnancy and maternity	N/A	No impact identified	N/A	N/A	N/A
Race/ethnicity	N/A	No impact identified	N/A	N/A	N/A
Religion and belief	N/A	No impact identified	N/A	N/A	N/A
Sex/gender	N/A	No impact identified	N/A	N/A	N/A
Sexual orientation	N/A	No impact identified	N/A	N/A	N/A
Other groups	N/A	No impact identified	N/A	N/A	N/A

What evidence and data has been used for this assessment, including community engagement and consultation? *(include links to data sources, consultations etc)*

The consultation that will be conducted will be inclusive and seek to gauge the view of as broader cross-section of the city as possible. This upcoming consultation will contribute evidence towards future iterations of this document.

How has the equality impact assessment informed or changed the proposal?

At this stage the EqlA has not changed the proposal but has flagged up that this document needs to be revisited as part of planning for the public consultation.

What actions have been identified going forward?

Revisit this EqlA as part of planning for the public consultation to identify any impacts and mitigating actions.

How will the impact of your proposal and actions be measured moving forward?

Through revisiting this EqlA as part of planning for the public consultation.
The impacts of the BNG SPD will also be monitored through:

Equality Impact Assessment

- Local plan monitoring against indicator EPE5 for policy 3 of the GNLP which requires that all relevant applications must achieve 10% BNG.
- Monitoring that the council is required to undertake in regard to the strengthened Biodiversity Duty which requires both qualitative and quantitative information on biodiversity actions, including BNG, that the council has undertaken in the monitoring period.

Officer completing assessment	Charlotte Rivett	Date	14.02.2024
Senior leadership team sponsor	Sarah Ashurst	Date	19/02/2024
Equality lead (strategy team)	Joe Siggins	Date	20/02/2024