



Interim Advice Note for Designing Strategically Significant Biodiversity Net Gain (BNG) February 2024

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Introduction and Summary

1. From February 2024 the national obligations begin to come into effect for new developments to achieve at least 10% biodiversity net gain (BNG). Within the Statutory Metric for calculating BNG is a category for scoring if a habitat is in biodiversity terms strategically significant.
2. From mid-2025 onwards the forthcoming Norfolk and Suffolk Local Nature Recovery Strategy (LNRS) will say which habitats and locations are strategically significant for BNG, but in the meantime this advice note performs that task for South Norfolk district. Its purpose is to direct developers to relevant existing plans and strategies so that BNG projects can be given the appropriate strategic weighting.
3. Development promoters are reminded that the Statutory BNG Metric is mandatory, that there is extensive guidance published by government that must be followed, and that prior to development commencing a Biodiversity Gain Plan must be submitted and approved by the planning authority. It is strongly encouraged that development promoters discuss the BNG requirements for their scheme upfront and prior to making a planning application, by paying for the pre-application service offered by the Council.

Purpose of this Advice Note

4. Listed here are existing and soon to be adopted plans and strategies that will assist developers in deciding if their BNG proposals count as strategically significant when being calculated against the Statutory Metric. In most cases, where the plans and strategies referenced in this advice note refer to a specific green infrastructure corridor or an allocation that can bring biodiversity improvement it will be treated as strategically significant against the Statutory Metric.

Background Principles to Biodiversity Net Gain (BNG)

5. BNG is required under the statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021), and in general terms it means that a standard pre-commencement condition is added to every planning permission the Council issues, except where certain exemptions apply. Then, for the pre-commencement condition to be discharged, a Biodiversity Gain Plan must be submitted and approved by the Council.
6. The Biodiversity Gain Plan will ensure that onsite gains are secured through approved plans and drawings, that offsite gains are appropriately registered, and if necessary, biodiversity credits are purchased. These gains must then be maintained for at least 30 years after the development is completed, which will be secured by drawing up a legal agreement under section 106 of the Town and Country Planning Act 1990, or alternatively the process is to apply for a conservation covenant.

7. From the earliest possible stage of designing their scheme, developers are encouraged to consider the Biodiversity Gain Hierarchy that is prescribed in Government guidance. Following the Biodiversity Gain Hierarchy is important because it is one of the factors the Council must consider when determining whether to approve a developer's Biodiversity Gain Plan. The order of the Hierarchy is:
 - a) avoiding adverse effects;
 - b) mitigating adverse effects;
 - c) enhancing onsite habitat;
 - d) creating onsite habitat;
 - e) securing the availability of registered offsite habitat; and as a last resort
 - f) purchasing biodiversity credits.

Applying Strategic Significance to Biodiversity Net Gain (BNG)

8. The focus of this advice note is to assist developers in completing the strategic significance section of the Government's Statutory Biodiversity Metric. The concept of which is to give a higher weighting to habitat that because of its location or type carries local biodiversity significance.
9. From mid-2025 onwards the forthcoming Norfolk and Suffolk Local Nature Recovery Strategy (LNRS) will say which habitats and locations are strategically significant for BNG. In the meantime, and until the LNRS is agreed, this advice note references the alternative plans and strategies for South Norfolk district that count as strategically significant.
10. Development promoters, in combination with specialist ecologist advice, can use this advice note to attribute strategic significance to their BNG proposals. Under the Statutory Biodiversity Metric this allows a BNG proposal to be given a strategic significance rating of 'High' and a scoring multiplier of '1.15'.
11. After considering this advice note developers are encouraged to discuss their ideas as part of seeking pre-application planning advice from the South Norfolk planning department.

Natural England Green Infrastructure Framework

12. Development promoters are recommended to consider the resources provided by Natural England. Their [Green Infrastructure Framework](#) (GIF) is an England-wide evidence base that can help target Green Infrastructure improvements where they are most needed.
13. On the Natural England website are mapping datasets ranging from the highest ecological designations to local playing fields. Using this mapping data could be a

helpful starting point in identifying ecologically important habitat types and locations, which can be supplemented by other local data sources.

The Norfolk and Suffolk Local Nature Recovery Strategy

14. The forthcoming Norfolk and Suffolk Local Nature Recovery Strategy (LNRS) will become the leading strategy for determining BNG. Writing a LNRS is a requirement of the Environment Act 2021 and its aim is to foster targeted, coordinated, and collaborative action in enhancing biodiversity and creating stronger green infrastructure connections.
15. As well as writing the LNRS, the Norfolk and Suffolk Nature Recovery Partnership is also pioneering habitat creation initiatives. Developers should familiarise themselves with such projects because in some instances they could be 'ready-made' options for fulfilling BNG obligations.

The Greater Norwich Green Infrastructure Strategy 2007 and its forthcoming replacement

16. This [strategy](#) was the first of its kind for Greater Norwich in bringing together the various ecological projects for the area. In 2022 the Greater Norwich Growth Board (GNBG) began working on a replacement strategy that when it is published will supersede its 2007 predecessor. The new strategy will be relevant to determining the strategic significance of BNG projects.
17. The original strategy nevertheless gives a basis for identifying suitable BNG proposals. For example, Part 1 of the strategy defines how investment decisions will be made and establishes 13 sub-regional green infrastructure corridors; and the Part 2 action plan lists a series of location specific projects.
18. The 13 sub-regional green infrastructure corridors remain relevant for identifying suitable BNG off-site proposals, and these corridors are:
 1. North East Norwich – Wroxham – North Walsham Corridor
 2. Norwich – Reepham – Aylsham Corridor
 3. North West Norwich – Wymondham – Attleborough – Thetford Corridor
 4. South West Norwich – Wymondham – Attleborough Corridor
 5. South Norwich – Mulbarton – Diss Corridor
 6. South Norwich – East of Diss Corridor
 7. Loddon – Beccles – Lowestoft Corridor
 8. East Norwich – Brundall – Acle – Great Yarmouth Corridor
 9. Aylsham – Wroxham – Acle – Great Yarmouth Corridor
 10. Great Yarmouth – Lowestoft Corridor
 11. East Norwich – The Broads – Great Yarmouth Corridor
 12. Acle – North Walsham – Aylsham – Cromer Corridor
 13. Lowestoft – Beccles – Bungay – Harleston – Diss – Thetford Corridor

19. Many of the projects listed in the Part 2 action plan will have been delivered or will have evolved over the 16 years since it was first written. Nevertheless, this plan still provides a stimulus for devising BNG proposals, and the green infrastructure corridor routes are relevant to scoring BNG projects against the Natural England metric for strategic significance.

Joint Core Strategy for Broadland, Norwich and South Norfolk 2011 (and amended 2014) and the forthcoming Greater Norwich Local Plan (GNLP)

20. The [Joint Core Strategy](#) was the first sub-regional local development plan for Greater Norwich and policy 1 gives a basis for green infrastructure and environmental enhancement which despite being a decade old can still be used in devising suitable BNG proposals. However, the JCS will soon be superseded by its replacement the Greater Norwich Local Plan ([GNLP](#)), for which the primary policy in guiding ecological improvement and green infrastructure is Policy 3.
21. Policy 1 of the JCS places into adopted planning policy two spatial themes that are useful in identifying suitable BNG proposals. These are:
- a. the sub-regional green infrastructure network; and,
 - b. biodiversity enhancement areas.
22. During 2024 the GNLP will supersede the JCS, and this new local plan provides an updated policy context. GNLP Policy 3: Environmental Protection and Enhancement is of most relevance to BNG, and developers who are devising projects should give particular attention to two policy requirements. These are:
- a. a requirement for new developments to provide land at a rate of 2 hectares per 1,000 population in accordance with Natural England's Accessible Natural Greenspace Standard; and,
 - b. provision or enhancement of green infrastructure to contribute (directly or indirectly) to the updated strategic green infrastructure network, as shown on Maps 8A and 8B.
23. When considering the implications of Policy 3, developers may consider whether their BNG obligations can also be met on land provided as Accessible Natural Greenspace. Such an approach could be acceptable, depending on the details of the scheme, and if the ecological gain calculated as BNG is additional to the environmental improvement accrued from creating the Accessible Natural Greenspace.
24. The principle of accruing multiple ecological gains from the same piece of land is known as 'stacking' and is often acceptable. Nevertheless, rules exist that restrict the stacking of some environmental stewardship and credit schemes, and developers must take responsibility for following legislation and Government guidance.

South Norfolk Area Action Plans, Site Allocation Plan, Development Management Plan, and the forthcoming South Norfolk Village Clusters Housing Allocations Plan (VCHAP)

25. After adopting the Joint Core Strategy in 2011, and its amendments in 2014, the Council adopted a series of further planning documents in 2015 and 2016, and they need considering when designing BNG. These are two area action plans, a site allocation plan, and development management policies document for South Norfolk:

- two area action plans providing details for larger-scale development in Long Stratton and Wymondham respectively;
- the site allocation plan that concerns uses like housing, employment, and community facilities for the rest of South Norfolk; and
- the development management policies document to inform the determination of planning applications.

26. These existing documents remain extant for the foreseeable future, and eventually the forthcoming South Norfolk Village Clusters Housing Allocations Plan (VCHAP) will add to the range of development plan documents relevant to BNG. This advice notes summarises each of these planning documents as to how they are relevant to BNG.

Long Stratton Area Action Plan 2016

27. This [plan](#) concentrates upon the large-scale expansion of Long Stratton, and amongst the plan's objectives is that new development contributes to the surrounding green infrastructure network and enhances the biodiversity of the area. In terms of BNG, Appendix 3 of the plan is an indicative map showing green infrastructure corridors in and around Long Stratton and sites along these corridors can be treated as strategically relevant for BNG.

Wymondham Area Action Plan 2015

28. This [plan](#) concentrates upon the large-scale expansion of Wymondham, and amongst the plan's objectives is maintaining, protecting, and enhancing the green infrastructure and biodiversity of the area. In terms of BNG, Appendix 5 of the plan is an indicative map showing green infrastructure corridors in and around Wymondham and sites along these corridors can be treated as strategically relevant for BNG.

South Norfolk Site Allocations 2015

29. This [plan](#) allocates land for specific types of development, for example housing, employment, community facilities, retail, and recreation; and, in terms of BNG most of these policies set guidelines for landscaping and green infrastructure. Opportunity may exist for improving ecological connectivity, but these policies are

of themselves unlikely to justify a BNG project being scored as strategically significant.

South Norfolk Development Management Policies Document 2015

30. This [plan](#) is written to guide the determination of planning applications, and in terms of BNG, linkages exist to policies 1.4 – ‘Environmental Quality and local distinctiveness’, 3.15 – ‘Outdoor play facilities and recreational space’, 4.4 – ‘Natural environmental assets – designated and locally important open spaces’, and 4.9 – ‘Incorporating landscape into design’, but these policies are of themselves unlikely to justify a BNG project being scored as strategically significant.

South Norfolk Village Clusters Housing Allocations Plan (VCHAP)

31. The forthcoming [South Norfolk Village Clusters Housing Allocations Plan \(VCHAP\)](#) is seeking to identify a series of smaller sites across the villages to accommodate a minimum of 1,200 new homes, with individual sites in the region of 20-50 homes per village. Opportunity may exist for improving ecological connectivity, but these policies are of themselves unlikely to justify a BNG project being scored as strategically significant.
32. The proposed plan was consulted upon between January and March 2023, and a further round of consultation will run until early in 2024. The timetable is to progress the plan to examination during 2024, and for the plan’s adoption in 2025.

Local Green Infrastructure Project Plans

33. In parallel to writing the Norfolk and Suffolk Local Nature Recovery Strategy (LNRS), further district-level green infrastructure studies are in preparation and will begin to be available from late 2024. This work will give more detailed mapping of ecological habitat and prompt more ideas for how biodiversity enhancements can be achieved, and how BNG can be strategically relevant – both in terms of location and habitat.

Neighbourhood Plans written by Town and Parish Councils in South Norfolk

34. South Norfolk is fortunate in having many town and parish councils who have written [neighbourhood plans](#), many of which include green infrastructure plans and projects. Developers wanting to identify BNG projects should consider these plans because they are statutory development plan documents.
35. Early engagement is recommended with both the relevant parish or town council and the South Norfolk planning department. Not all neighbourhood plans refer to BNG, and even when they do it will need to be determined on a case-by-case

basis whether what is being proposed counts as being strategically significant against the Statutory Metric.

36. At the time of writing South Norfolk has 10 adopted plans. More plans are being prepared, and there are currently 7 emerging. The following table lists the neighbourhood plans as of January 2024, based on which are adopted and which are being prepared.

Table 1: South Norfolk Neighbourhood Plans and their Strategic Significance to BNG

Parish	Year of Adoption	Relevance to BNG	Comment
Cringleford	2013	✖	Predates the latest BNG legislation and guidance.
Easton	2017	✖	Policy 5: 'Enhancing Bio-diversity' refers to improving connections, which may have some relevance to designing BNG, although the plan predates latest legislation and guidance.
Dickleburgh & Rushall	n/a	✖	Draft plan not yet submitted to South Norfolk Council.
Diss & District	2023	✓	Refer to Policy 8 – 'Green Corridors and Biodiversity Enhancement'.
Hingham	n/a	✖	Draft plan not yet submitted to South Norfolk Council.
Loddon & Chedgrave	n/a	✖	Draft plan not yet submitted to South Norfolk Council.
Long Stratton	2021	✓	Policies GI16 and GI17 focuses on providing and maintaining recreational green space to enhance biodiversity.
Mulbarton	2015	✖	Adopted 2015, predating the latest BNG legislation and guidance, but Policy ENV2 refers to improving the biodiversity of the Common.
Newton Flotman	n/a	✖	Draft plan not yet submitted to South Norfolk Council.

Parish	Year of Adoption	Relevance to BNG	Comment
Poringland	2021	✓	Policy 6: 'Natural Environment' discusses support for proposals that would result in a significant net ecological gain.
Redenhall with Harleston	2022	✓	Policy RWH21: Natural assets, discusses how proposals involving biodiversity net gain will be supported.
Shotesham	n/a	✗	Draft plan not yet submitted to South Norfolk Council.
Starston	2022	✗	Emerging Policy STA7: discusses how the enhancement of Local Green Spaces will be encouraged where they lead to further ecological networks and biodiversity net gain.
Tasburgh	n/a	✗	Submission draft July 2023. Emerging policy TAS1: 'Natural assets', discusses ways in which 10% BNG should be achieved.
Tivetshalls	2022	✓	Policy TIV11: 'Natural assets' – discusses restoring and repairing fragmented biodiversity networks.
Trowse with Newton	n/a	✗	Draft plan yet to be submitted to South Norfolk Council, but emerging Policy 7: 'Biodiversity and Green Corridors', details strategically significant priority habitat.
Wymondham	2023	✓	This plan has two policies of relevance to BNG – Policy 6: 'Strategic Green Infrastructure Network', and Policy 7 'Green Ribbons/Local Green Infrastructure Network'.

Conclusion

37. The plans and strategies identified in this advice note provides an evidence base for designing BNG projects and a basis for judging whether proposals could count as strategically significant when assessed against the Statutory Metric. This advice note should be read alongside the mandatory guidance for BNG and used to prepare a Biodiversity Gain Plan.

Links to Strategically Significant Plans and Strategies Relevant to South Norfolk District

The plans and strategies referred to in this advice note are listed below in order of their appearance with weblinks correct as at January 2024.

Natural England Green Infrastructure Framework

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

Greater Norwich Infrastructure Strategy 2007

<https://www.greaternorwichgrowth.org.uk/reports/green-infrastructure-strategy/>

Joint Core Strategy for Broadland, Norwich and South Norfolk 2011 and 2014

<https://www.southnorfolkandbroadland.gov.uk/downloads/download/103/joint-core-strategy>

Greater Norwich Local Plan

<https://www.gnlp.org.uk/>

Long Stratton Area Action Plan 2016

<https://www.southnorfolkandbroadland.gov.uk/downloads/download/102/long-stratton-area-action-plan>

Wymondham Area Action Plan 2015

<https://www.southnorfolkandbroadland.gov.uk/downloads/download/101/wymondham-area-action-plan>

South Norfolk Site Allocations 2015

<https://www.southnorfolkandbroadland.gov.uk/downloads/download/93/site-specific-allocations-and-policies-document>

South Norfolk Development Management Policies Document 2015

<https://www.southnorfolkandbroadland.gov.uk/downloads/download/100/development-management-policies-document>

South Norfolk Village Clusters Housing Allocations Plan (VCHAP)

<https://www.southnorfolkandbroadland.gov.uk/emerging-local-plan/south-norfolk-village-clusters-housing-allocations-plan>

A List of Adopted and Emerging Neighbourhood Plans written by Town and Parish Councils in and South Norfolk

<https://www.southnorfolkandbroadland.gov.uk/neighbourhood-plans>



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