

**Greater Norwich Local Plan  
Pre-Submission Draft Strategy – Regulation 19 Publication Strategy  
Representations on behalf of Orbit Homes**

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**Policy 3 – Environmental Protection and Enhancement**

Policy 3 introduces a requirement for 10% biodiversity net gain. This is to be introduced nationally and Orbit Homes support the inclusion of this requirement in principle, but have concerns regarding its implementation in practice where off-site benefits are required.

**Biodiversity Net Gain**

In our experience of working with the various biodiversity metrics proposed to assess biodiversity net gain, it is not always possible to demonstrate net gains on-site. The reason for this is that the weighting given to any habitat loss (even if that habitat is not of itself particularly special – e.g. improved grassland) is greater than that for habitat gain (even if the gain introduces much improved habitat it will naturally be of a smaller size to allow for development), such that in many instances off-site benefits will be required to achieve 10% net gain.

Orbit Homes are supportive in principle of introducing biodiversity net gain requirements, but to be effective, the GNLPP must include provisions for the timely delivery of off-site biodiversity benefits. In this regard, Planning Practice Guidance (ID: 8-023-20190721) states that:

*"Off-site measures can sometimes be secured from 'habitat banks', which comprise areas of enhanced or created habitats which generate biodiversity unit 'credits'.*

If developers are required to individually deliver off-site biodiversity improvements through acquiring additional land or working with third parties on a site by site basis, there is a very real risk that the timely delivery of new homes will be severely impacted. Orbit Homes therefore considers that in order for this policy to be effective and sound, the GNLPP must include a mechanism for developers to pay into a central pot that will be used to deliver biodiversity improvements on a wider scale.

**Recommendation:** The policy should be amended to include a mechanism for the delivery of off-site biodiversity net gain. The Council has an important role to play in this regard to ensure that sites which cannot demonstrate on-site benefits are not prevented from coming forwards due to the lack of opportunities to contribute to wider habitat creation projects.