

British Land response to BG/BG

Site ID 115169 / HELAA Site ID: 40048

British Land support the aspiration of the GCLP to ensure development delivers biodiversity net gains to ensure habitats for wildlife are enhanced and left in a measurably better state than they were before development.

It is noted and that the policy requires all development to deliver the minimum 10% BNG unless exempt and mandated by the Environment Act 2021. However, the requirement for 'major' development to deliver 20% BNG is considered inconsistent with national policy and the PPG which states, at Paragraph: 006 Reference ID: 74-006-20240214, that, "plan-makers should seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified."

Furthermore, it is worth noting that the consultation draft NPPF (2025) states, at Chapter 19, Paragraph N1(2), that Development Plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Achieving 10% BNG is extremely challenging on greenfield sites and imposing a requirement to meet anything above 10% will prove major challenges for development viability on such sites.

It should be noted should the draft NPPF (2025) be adopted in its current form with the above requirement in terms of BNG ahead of the GCLP Regulation 19 Consultation then the GCLP will need to be consistent with national policy in the Framework, to ensure it meets the tests set out in paragraph 36 (d) of the NPPF. Suggested revised wording for the policy BG/BG is provided below:

"1. All development must deliver statutory biodiversity net gain (BNG), providing a minimum of 10% BNG against the baseline, unless exempt under the Environment Act 2021, to be provided on-site in line with guidance."