

Draft Greater Cambridge Local Plan 2024-2045

Comments on behalf of Martin Grant Land Limited

Land at Silverdale Close, Coton

Policy BG/BG: Biodiversity and Geodiversity

- 1.1. These representations have been prepared by Stantec on behalf of Martin Grant Land Limited (formerly Martin Grant Homes) pursuant to their land interests at Silverdale Close, Coton. The site has been assessed within the Housing and Economic Land Availability Assessment 2025 (HELAA). The Site ID is 115148 and the HELAA Site ID is 40079.
- 1.2. These representations provide updated information regarding the site, and should be read in conjunction with the following submissions:
 - Call for Sites March 2019
 - Regulation 18 Issues and Options February 2020
 - Regulation 18 First Proposals December 2021
 - Call for Sites Submission Update March 2025
- 1.3. Martin Grant Land has concerns regarding points 1 and 2 of proposed policy BG/BG.

Biodiversity Net Gain Point 1

- 1.4. Point 1 of policy BG/BG states that the 10% biodiversity net gain should be provided on-site. However, and as noted within point 2 of the same policy, the biodiversity net gain policy should retain flexibility in order to allow off-site provision where it cannot be provided on site. The Planning Practice Guidance, in paragraph:001 Reference ID:74-001-20240214 Biodiversity Net Gain states the following:

'This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits'

- 1.5. Failure to add this flexibility will prevent some sites in sustainable locations being built given this clear restriction. It is therefore suggested that policy BG/BG point 1 is amended as 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~~ **in line with guidance where this is feasible and effective**'*

Biodiversity Net Gain Point 2

- 1.6. Point 2 requires major development to provide a minimum of 20% biodiversity net gain to be provided on site where feasible and effective. There are serious concerns regarding the required provision of 20% biodiversity net gain, rather than the 10% set out within the Environment Act. Such mandatory increases will have significant impacts upon layout and viability, with the potential to prevent suitable sites coming forwards. Given the spatial strategy is fully reliant upon major developments, the risk of delay or failure of some sites to contribute to delivery is high.
- 1.7. Paragraph: 006 Reference ID:74-006-20240214 of the Planning Practice Guidance Biodiversity Net Gain provides clear guidance that the 10% figure set out within the Environment Act should not be exceeded within Local Plans. The PPG states:

Draft Greater Cambridge Local Plan 2024-2045

'Plan-makers should not 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. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented'

- 1.8. The Government also published a draft NPPF for consultation in December 2025, which shows the current direction of travel for emerging Government policy. In line with the above paragraph of the PPG, emerging policy N1 of the NPPF states the following:

'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'

- 1.9. In light of this, it is suggested that point 2 of policy BG/BG be deleted or only added to policies supporting the relevant allocations.