Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Alison Stanley	
Organisation (where relevant)	Gonville & Caius College, University of Cambridge	
Job Title (where relevant)	Endowment Property Manager	
Address, including Post Code	Trinity St, Cambridge CB2 1TA	
Telephone	[redacted]	
Email address	[redacted]	

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy BG/BG – Biodiversity and Geodiversity
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	Yes
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Gonville & Caius College, University of Cambridge ("Caius") supports the principle of biodiversity net gain (BNG) and notes the statutory requirement for development is to deliver at least 10% biodiversity net gain (Environment Act 2021)

However, Caius object to the proposed requirement in Policy BG/BG that *…" Major development must provide a minimum 20% biodiversity net gain".*

The College does not consider a blanket 20% requirement on all major sites – which will have very different physical, value and ecological typologies (city centre, rural, greenfield or brownfield) – has been evidenced in terms of practical deliverability and impacts on viability on different and specific sites - as opposed to a whole plan viability argument.

The NPPF 2024 does not set out a percentage target – neither does the current NPPF set out a specific target.

Significantly PPG (Reference ID: 74-006-20240214 006) notes*…"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"* …and goes on to notes such justification/evidence relates to local needs, local opportunities for a higher percentage and any impacts on viability for development.

Seeking a higher requirement should only be by way of an exception, and in this case, demonstrating that Greater Cambridge is significantly worse than any other part of the country as a whole with regards to the negative impacts on biodiversity seems realistic and unproven.

Moreover, a material consideration is not whether the 20% BNG requirement can be accommodated in isolation, but whether development remains viable when the cumulative effect of Policy BG/BG is considered alongside the Plan's other policy requirements, Section 106 obligations, and the forthcoming introduction of CIL.

Caius therefore considers Policy BG/BG requirement for a minimum of 20% BNG on major development to be unsound. The policy requirement does not meet the NPPF requirements:

Positively prepared - the 20% requirement could lead to viability issues impacting on the plans objectively assessed needs);

Justified - a more site by site approach would be a more appropriate strategy rather than the blanket approach proposed); and

Consistent with national planning policy - not in accord with NPPF or the PPG

Please provide a 100 word summary of your representation.

Gonville & Caius College objects to the soundness of Policy BG/BG, which mandates a blanket 20% biodiversity net gain (BNG) for major developments. This exceeds the statutory 10% requirement established by the Environment Act 2021 without clear local justification or site-specific viability evidence. Planning Practice Guidance discourages arbitrary area-wide increases above 10%. A uniform policy fails to account for diverse land typologies and, crucially, ignores the cumulative financial impact when combined with other Section 106 obligations and CIL. The policy should align with national policy or allow site-by-site assessments.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

NONE

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Caius would request the following change to Policy BG/BG

2. Major development should achieve the statutory biodiversity net gain of 10%. A higher percentage may be required where supported by site-specific evidence demonstrating local need, local opportunities, viability and deliverability, in accordance with national planning policy and guidance".

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	YES

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Caius is a significant landowner thought Greater Cambridge. Its core educational estate is complimented by extensive agricultural, residential, and commercial land and property much of which has development potential. Caius wishes to directly express its views to the Inspector.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	YES
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	YES
Informed of adoption of the Local Plan	YES