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	Holly Gardiner	Matt Clarke
Organisation (where relevant)	Wates Developments	Boyer
Job Title (where relevant)		Director, Head of Boyer East
Address, including Post Code	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO4 5YQ
Telephone		01206 584750
Email address		mattclarke@boyerplanning.co.uk

* 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.

Policy BG/BG: Biodiversity and geodiversity

Part 2 of Policy BG/BG states that all major development should achieve a net gain in biodiversity of 20% unless exempt under the Environment Act 2021. As the Council will be aware, NPPF26 indicates within Policy N1 that the only time where it may be appropriate to seek more than 10% BNG through local policy relates to specific site allocations, and even then, only where this is clearly justified and deliverable. This is a clear direction of travel with regard to BNG that there should not be general requirements for development to deliver beyond the 10% required by the Environment Act.

Whilst it is recognised that this plan is being examined under the NPPF24, NPPF26 is still a material consideration given that applications will be determined under the latest Framework and policies that are inconsistent with NPPF26 should be given limited weight.

However, even if it is deemed that the 2026 policy reference set out above is not strictly applicable under the transitional arrangements the approach is not considered to be justified, having regard to para 74-006-20240214 of PPG which states that:

"… 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".

This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified. There must be a very clear and robust justification that the area is significantly worse than the country as a whole and that this decline is directly related to the new development rather than, for example, the result of changes in agricultural practices or industrial pollution. It is not sufficiently robust to highlight declines in species that, whilst an important issue, are not necessarily as a result of new homes being built.

Due to the significant uncertainty over cost and the clear direction as to such policies in NPPF26 it is suggested that rather than seek to go beyond the statutory requirement the Council should be working with developers to ensure that 10% can be delivered in a manner that maximises the benefits for local people. Policy BG/BG is considered to be unsound as it is inconsistent with national policy.

Please provide a 100 word summary of your representation.

We object to Part 2 of Policy BG/BG which states that all major development should achieve a net gain in biodiversity of 20% unless exempt under the Environment Act 2021. Due to the significant uncertainty over cost and the clear direction as to such policies in NPPF26 it is suggested that rather than seek to go beyond the statutory requirement the Council should be working with developers to ensure that 10% can be delivered in a manner that maximises the benefits for local people. Policy BG/BG is considered to be unsound as it is inconsistent with national policy.

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.

Please see accompanying statement

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.

Delete Part 2 of Policy BG/BG. Due to the significant uncertainty over cost and the clear direction as to such policies in NPPF26 it is suggested that rather than seek to go beyond the statutory requirement the Council should be working with developers to ensure that 10% can be delivered in a manner that maximises the benefits for local people. Policy BG/BG is considered to be unsound as it is inconsistent with national policy.

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.

So that the matters raised within these submissions can be developed through direct discussion in order to assist the Inspector's assessment more efficiently than relying solely on these written representations.

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