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	Harry Bunbury	Sophia Nitschke
Organisation (where relevant)	Henry Boot Developments Limited	Twenty5 Planning Limited
Job Title (where relevant)		Senior Planner
Address, including Post Code		50/60 Station Road Cambridge CB1 2JH
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
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	No

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.

HBD supports the overall objective of securing biodiversity improvements through development and recognises the importance of Biodiversity Net Gain (BNG) as part of the planning system. However, concerns are raised regarding the soundness of the requirement for all major developments to deliver a minimum 20% BNG, which exceeds the statutory national requirement of 10% BNG.

Whilst local planning authorities may seek outcomes that go beyond national minimum requirements, the Plan should clearly demonstrate why a higher local target is necessary, justified and deliverable. The supporting evidence does not adequately explain why the national requirement of 10% BNG is insufficient to achieve the biodiversity objectives of Greater Cambridge.

The proposed 20% requirement is likely to have significant implications for development viability and deliverability, particularly when considered alongside the cumulative impact of other Local Plan requirement including affordable housing/workspace, CIL, net zero carbon standards, water efficiency requirements and other planning obligations.

Policy BG/BG should be amended to require development to deliver the statutory minimum 10% BNG, in accordance with the national framework established by the Environment Act 2021, with 20% expressed as an aspiration, until robust local evidence demonstrates that a higher requirement is justified, deliverable and has been fully tested through the Plan's viability evidence.

Please provide a 100 word summary of your representation.

HBD supports the objective of enhancing biodiversity through development but objects to Policy BG/BG's requirement for all major developments to deliver a minimum 20% Biodiversity Net Gain (BNG). The policy exceeds the statutory 10% BNG requirement without sufficient evidence demonstrating why a higher local target is necessary, justified or deliverable. Concerns are also raised regarding the cumulative impact of the requirement when considered alongside affordable housing and workspace obligations, CIL, net zero carbon standards, water efficiency measures and other planning contributions. HBD therefore seeks amendments to require the statutory 10% BNG minimum, with 20% retained as an aspirational target pending viability testing.

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 refer to the full representations submitted in support of this response.

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.

Amend Policy BG/BG to reduce the mandatory Biodiversity Net Gain (BNG) requirement from 20% to the statutory national minimum of 10%. The policy should instead identify 20% BNG as an aspirational objective rather than a mandatory requirement. This amendment is sought to ensure the policy is justified by evidence and does not undermine development viability when considered alongside other Local Plan requirements, including affordable housing and workspace, CIL, net zero carbon standards, water efficiency measures and other planning obligations.

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.

Participation at the Examination Hearing is necessary as the Local Plan is overall not considered to be legally compliant or sound. Attendance at the hearing sessions will provide an opportunity to explain these concerns in greater detail, respond to matters raised by the Inspector and other parties, and discuss the modifications required to make the Plan sound.

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