

Greater Cambridge Local Plan (Regulation 18: Preferred Options 2021)

Representation submitted on behalf of

Henley Real Estate Developments Ltd

By

RPS Consulting & MSP+D Ltd

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1.Executive Summary

- 1.1 This representation is submitted on behalf Henley Real Estate Developments Ltd (“HRE”), a private UK real estate company with over 35 years of experience having developed over £390m of UK schemes.
- 1.2 In light of the Environment Act of November 2021 which will make mandatory biodiversity net gain requirements, through amending the Town and Country Planning Act, for permitted developments to provide a minimum of 10% net gain either on site, off site or via statutory biodiversity credits - HRE are developing new habitat creation sites throughout England.
- 1.3 This representation seeks to have a site at Steeple Morden, South Cambridgeshire, to be allocated within the Greater Cambridge Local Plan as a nominated site for biodiversity net gain credits to be available for offsetting by developers of alternative sites within the Greater Cambridgeshire Local Plan where such development cannot provide the bio diversity net gain requirements on site.
- 1.4 Section 2 of this representation gives the site location and reasons why it is considered that the site can significantly provide biodiversity net gains within the Plan period.
- 1.5 Section 3 identifies the proposed policy direction relating to biodiversity net gain for the Regulation 18 Draft of the Greater Cambridgeshire Local Plan and section 4 undertakes a planning assessment and make recommendations to amend policy relating to Biodiversity Net Gain in order to make the submitted plan sound for adoption.

Section 2 – Steeple Morden habitat credit site

2.1 Site location/description

The Steeple Morden habitat credit site is a single field, currently in arable use. It is 5.51 hectares in size and has been cropped for winter barley for the last four years. The approximate location is shown on the Figure below. The site has vehicular access from North Brook End Road, a public highway.



Figure 1: Steeple Morden Habitat Credit Site

2.3 Proposals for the Steeple Morden Habitat Credit Site

HRE are planning to restore the arable field to species-rich calcareous grassland. The proposals include:

- Undertaking a clear ecological assessment and report including a detailed botanical survey to validate the baseline conditions of the site.
- Prepare an ecological plan for enhancement setting out the aim and objective and the target habitat, in this case species-rich calcareous grassland.
- Undertaking an ecological assessment and report including a detailed botanical survey to validate the enhancements to the site.
- Verify the habitat credits generated using the Defra V3.0 calculator.
- The habitat enhancements will take place in advance to allow the habitat to 'bed in' and to ensure the planned enhancements have been delivered on the ground.
- There will be a 30-year management plan prepared for the site.
- Monitoring of the habitats and the supporting biodiversity will be undertaken and recorded.

These habitat credits would then be available to developers where they required off-site habitat credits for planned developments that are unable to fully meet their 10% (or 20%) Biodiversity Net Gain requirements on-alternative sites.

2.4 Context of the site in relation to Green Infrastructure Strategic Initiatives

It is considered that the ecological context for the Steeple Morden habitat credit site supports, is consistent and is aligned with the with the strategic aims of the green infrastructure network. Specifically:

- The site sits in the headwaters of a chalkstream tributary of the River Cam.
- The site is in the watercourse corridor of this chalk stream and is only separated from the watercourse by a narrow newly planted woodland.
- This woodland is recognised in the Greater Cambridge Existing green infrastructure network.
- It is considered that the site will help deliver the 'Revitalising the chalk stream network' strategic green infrastructure initiative.
- It is considered that the site will help deliver the "Pollinator Corridors' strategic green infrastructure initiative.

3. Greater Cambridge Draft Local Plan Regulation 18 Policy Considerations

3.1 We note the plan's proposed policy direction when it comes to Biodiversity:

- The policy will require development to achieve a minimum 20% biodiversity net gain, noting that Biodiversity net gain should be submitted using the Defra Biodiversity Metric 3.0 or its successor.
- Biodiversity net gain should be delivered on-site where possible, recognising that for smaller developments in particular, more significant and long-lasting biodiversity enhancements may be achieved via contributions towards off-site, larger scale projects.
- Where it is agreed that off-site habitat measures would bring greater biodiversity benefits than on-site measures, these must be consistent with the strategic aims of the Greater Cambridge green infrastructure network strategic initiatives.
- The Councils will seek to use planning conditions to secure on site habitat creation and its long-term management, and obligations where BNG is on land outside the applicant's control

3.2 We note on page 169/170 reasons given for this policy direction as:

- *“At an Oxford-Cambridge Arc level we and our partner authorities have agreed a set of Arc Environmental Principles which include the aims of doubling the area of land managed primarily for nature, and also to deliver a minimum 20% biodiversity net gain on development sites. These ambitions, together with the relatively low level of designated sites and priority habitats that Greater Cambridge has compared with other English areas, highlight the need for development to bring further net gains beyond the 10% proposed nationally.”*
- *“The focus for biodiversity enhancements is intended to be within the boundary of a site, and could include providing wildlife areas, trees, or smaller measures such as including bat or swift boxes. However, if the required level of net gain cannot be provided on site there is the potential for applicants to contribute to biodiversity enhancements elsewhere – a range of strategic initiatives have been identified to support biodiversity enhancement across Greater Cambridge (see BG/GI), meeting national policy requirements to take a strategic approach to promoting the restoration and enhancement of the green infrastructure network. Ahead of the draft plan we will work with partners to explore the best way to collect and distribute funds from development for this purpose.*
- *Beyond biodiversity net gain, national policy encourages local plans to seek wider environmental gain from development. Approaches for measuring this are emerging nationally, and we will review this topic ahead of the draft plan.*
- *Designated biodiversity sites within and close to Greater Cambridge are being impacted by increasing numbers of visitors – an issue that needs to be addressed to protect these vulnerable habitats and the species they support. For nationally designated sites, Natural England have identified Impact Recreation Zones and recommend the application of Suitable Alternative Natural Greenspace standards to inform the quantity of green space provision required for people, to lessen the impacts on these nature sites. Greater Cambridge has relatively few nationally designated nature sites, but many locally designated sites. Ahead of the draft plan we will explore how we can best measure and mitigate the impact of development on these local sites.”*

4.Planning Policy Assessment and sought modifications to the Regulation 18 Draft Plan.

- 4.1 It is considered that where off-site habitat measures are provided, and where they are consistent with the strategic aim of the green infrastructure network:
- New offset sites that demonstrably show enhanced biodiversity should be registered.
 - These offset sites should be allocated as ‘other designated nature sites’.
 - These offset sites should be mapped within the green infrastructure network.
- 4.2 It is considered that the site at Steeple Morden needs to be allocated within the draft local plan as an “other designated nature site” within figure 53 of the regulation 18 draft plan because:
- The site will deliver significant biodiversity enhancements - as evidenced in section 2 of this representation - and so create habitat credits to offset off-site biodiversity net gain requirements within Greater Cambridgeshire.
 - The site will deliver the identified habitat net gain improvements before the plan is adopted.
 - Having the site allocated in the adopted plan will help deliver the plan’s wider strategic green infrastructure initiatives.
 - The site will help deliver the ‘Revitalising the chalk stream network’ and the ‘Pollinator Corridors’ strategic green infrastructure initiatives.
- 4.3 In order to make the draft regulation plan “sound” as defined by Paragraph 35 of National Planning Policy Guidance, it is considered that:
- the proposed biodiversity enhancement measures to be undertaken at the Steeple Morden site, as given in this representation, demonstrates that the site needs to be allocated as a “other designated nature site” because it will deliver off-site biodiversity net gain requirements within South Cambridgeshire.
 - the allocation is also in accordance with Section 15 – Conserving and Enhancing the Natural Environment - paragraphs 174 (d) and 180 of the National Planning Policy Framework.
- 4.4 The site’s allocation in the Greater Cambridgeshire Local Plan also helps to deliver the Council’s statutory requirement to meet the 2021 Environment’s Act’s requirement to deliver biodiversity gain requirements – which will become law by amendments to the Town and Country Planning Act expected to come into force in 2023.