

Comments on Greater Cambridge Planning Obligations Supplementary Planning Document

Section 6 of the *Greater Cambridge Planning Obligations Supplementary Planning Document* focuses on the biodiversity impact of development, and in particular the concept of Biodiversity Net Gain (BNG). Section 6.8 states that 'Developers must ensure at least 10% biodiversity net gain' and that 'biodiversity improvements must be maintained for at least 30 years'. This is indeed the legal minimum, and the requirement for the 2018 local plans. I trust the 20% BNG mentioned in earlier drafts of the local plan will not be not adversely affected by this SPD.

Section 6 states that 'BNG can be delivered on-site or off-site (through purchasing biodiversity credits or enhancing nearby habitats)'. However, while Paragraphs 6.20-6.25 place considerable emphasis on off-site BNG, there is no further reference to near-site BNG. This balance needs correcting – development on green belt sites can displace species classified as 'vulnerable to extinction in the UK' and 'near-threatened' at a time when the latest State of Nature report (2023) states that around one in six species are at risk of becoming extinct in the UK. And many threatened species are relatively sedentary and unlikely to move some distance towards the s106 agreements that 'the planning service has already negotiated and agreed with offsite providers for the establishment of habitat banks' (Paragraph 6.21).

I propose a new Paragraph 6.21 which states that:

'Where species classified as 'vulnerable to extinction' or 'near threatened' in the UK are present on a site, a separate mitigation package will be required for these species adjacent to the areas impacted and steps must be taken to improve sufficient appropriate habitat in nearby, adjoining areas to accommodate the displaced species.'

There is one further issue with Section 6: Paragraph 6.17 states that:

'Pre-development biodiversity value must be calculated before any site clearance or other habitat management work has been undertaken, by the applicants or anybody else. However, if this is known to have happened, on or after 30th January 2020 the condition of the site will be taken as the habitat baseline.'

The second sentence in Paragraph 6.17 provides a significant loophole for developers and should be deleted or strengthened considerably.

[As an example, the biodiversity implications of recent Biomedical Campus Applications 24/01529/REM and 24/01589/REM were based on highly questionable sources including one that had designated the area as 'amenity grassland' when the field had been planted with wheat at the time the field was surveyed! As a result the development avoided any mitigation for the loss of habitat for threatened arable species. When planning applications for the E/2 land in the South Cambridgeshire local plan 2018 come up it will be vital to avoid such dubious practices and mitigate effectively for threatened species.]

John Meed, December 2024. See johnmeed.net/ecology