

Sent by email to: Robert Young (guildfordplan2exam@gmail.com)

02/12/2022

Dear Inspector.

### **BNG capacity in Guildford.**

The note provides a helpful indication as to the potential capacity of the Tyting Habitat Bank to accommodate the demand for offsite credits within Guildford. The Council have based their evidence on the examples provided within the Biodiversity Net Gain Study that was produced for the hearings and was not part of the evidence base submitted with the local plan. The Council outline in the evidence that they have taken a precautionary approach with regard to sites that may require biodiversity credits and the degree of offsite mitigation that would be required.

However, the use of the limited number of examples as part of the justification goes to the heart of our concern with regard to the Council's 20% BNG. It is not possible to take a limited sample of sites and then suggest that these will reflect the circumstances found on all other sites. Some sites will fall within these parameters, others will need to deliver significantly more biodiversity units and some less. However, until the baseline has been measured and the units required to deliver the requisite net gain it is not possible to know what will be needed. These uncertainties are a concern when it comes to meeting the 10% minimum in the Environment Act and a 20% net gain will make some development unviable.

If we take the assumptions made by the Council as being reasonable the note indicates that 266 offsite credits will be required to ensure the plan is deliverable across the plan period. Tyting Farm will only be able to support about half of the credits required by development. The Council assume that more schemes will come forward, we would not disagree, but timing of these and the cost of future schemes is unknown. These will take time to deliver, will not be ring fenced for development in Guildford and the cost may be well in excess of that proposed at Tyting Farm and could impact on the viability of development. As such there remains uncertainty as to the deliverability of this policy.

As set out in our representations developers should be encouraged to go beyond the minimum requirements where possible. Some development will and as such BNG across the plan period will exceed 10% - the level acknowledged by Government as





being required to ensure no net loss of biodiversity. This is sufficient to meet the requirement in paragraph 174 of the NPPF for planning policies to provide a net gain in biodiversity. Such an approach would also ensure that Tyting Farm would offer support to development across the plan period ensuring the part 1 local plan remains deliverable.

Yours faithfully

Mark Behrendt MRTPI  
Planning Manager – Local Plans  
Home Builders Federation  
Email: [mark.behrendt@hbf.co.uk](mailto:mark.behrendt@hbf.co.uk)  
Tel: 07867415547

