

## **Taylor Wimpey Response to the Guildford Borough Council Biodiversity Net Gain (BNG) Capacity in Guildford**

**2 December 2022**

1. I write on behalf of Taylor Wimpey (TW), who control the majority of Local Plan: Strategy and Sites (2015 - 2034) (LPSS) Allocation A35. This note provides comment on the Biodiversity Net Gain (BNG) Capacity in Guildford note produced by GBC and published on 17<sup>th</sup> November 2022 (**ref ED-GBC-LPDMP-010**) ('The GBC Technical Note').
2. TW maintains their original Regulation 19 representation, objecting to the 20% BNG policy requirement in emerging policies P6-9 as outlined in our Matter 3 and 7 Statements to the DMP Examination. The reason is not that such is not achievable at Wisley New Settlement (WNS) (Allocation A35) (because it is), rather that the policy requires justification as to the specific reasons why a departure from national policy is justified.
3. For the Former Wisley Airfield (FWA), consultants EPR have predicted that the planning application submitted by TW would yield 52.47% BNG (factoring 'SANG discounts'), though if these are excluded the actual BNG is 75.93%. Further information is provided in Chapter 8 of the ES submitted with the planning application for 1,730 dwellings (Technical Appendix 8.12).
4. The GBC Technical Note outlines from paragraph 5.16 the situation at FWA. At paragraph 5.17 GBC correctly recognise that WNS will propose more than 20% BNG; this is not disputed. Thus it will not need off-site credits.
5. The Note does not, however, recognise the potential for FWA to contribute to the 'Habitat Bank', owing to the excess over 20% BNG provided. This contribution would of course be greater were the national standard of 10% on-site applied. This is the crux of TW's position on the emerging DMP, that perversely it acts to hinder the scope of sites to deliver the requirement, and contribute more to the Habitat Bank and credits therein. This would aid development delivery across the Borough, and also the network of sites contributing to overall BNG.
6. It should be further recognised that there are two other smaller landowners within A35. The Harris Land (represented by CBRE) is anticipated to deliver circa 200 units (of the 2,000 allocated at the WNS) and will provide a SANG, and BNG of over 20%. There is also further land, to deliver circa 70 dwellings controlled by Hallam Land. The GBC Technical Note only refers to the Hallam Land at paragraph 5.18. TW understands that Hallam is seeking an off-site SANGs solution, and hence this land should be able to contribute more BNG (as there would be no SANGs discount). As the Note is technical evidence to support the DMP, TW requests that it be updated to reflect the situation of the three landownerships.
7. **Thus, overall the Inspector should be mindful that a 20% requirement will not hinder the delivery of WNS, rather, what is material, is the amount of credits that might otherwise not be provided.**
8. **The 20% BNG policy if kept, should be an aspirational target to reflect the lawful position as a legal minimum.**

**END**