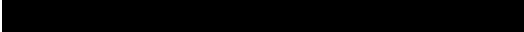


The Planning Bureau Limited

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Planning Policy Team
Broads Authority
Yare House
62-64 Thorpe Road
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NR1 1RY

Via email: 

23RD September 2025

Dear Sirs,

McCARTHY STONE & CHURCHILL LIVING RESPONSE TO THE BROADS LOCAL PLAN REVIEW SUBMISSION DRAFT

Thank you for the opportunity to comment on the Broads Submission Local Plan.

McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector. Please find below our comments on the draft local plan.

Policy PUBDM16: Biodiversity Net Gain requires sites to deliver 20% Biodiversity Net gain

The Council should not set a higher biodiversity net gain (BNG) requirement for development in the Broads areas than that set out in the Environment Act 2021. Requiring BNG above 10% does not meet the tests set out in paragraph 57 of the NPPF and in particular a greater than 10% requirement is not necessary to make the development acceptable in planning terms and a 10% requirement should be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF).

The Council should also note that the Planning Policy Guidance on Biodiversity Net Gain at paragraph: 006 Reference ID: 74-006-20240214 confirms that '*Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented*'. Therefore a 10% requirement should also be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF) and consistent with national policy guidance.

We appreciate that the council has attempted to support the increased requirement via an evidence document however we have concern as to the limited cost that has been used for Biodiversity Net Gain within this document as well as the Viability Assessment. BNG costs are taken from a 2019 DEFRA biodiversity net gain impact assessment and suggests costs are in the region of £1272 per dwelling on greenfield sites and £304 per dwelling on brownfield sites.

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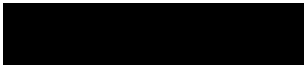
However, the Council should note that on 27th July 2023 the price of statutory biodiversity credits were published (available from . [Statutory biodiversity credit prices - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/statutory-biodiversity-credit-prices)). This has enabled it to be determined how much BNG may cost and it is considered that the costs per dwelling put forward in 2019 by DEFRA have underestimated the costs. In addition, brownfield site BNG costs are often more substantial than Greenfield but this very much depends on the site characteristics. As a result the Council should reconsider whether 20% BNG is reasonable and financially viable especially when considered alongside other additional costs.

Therefore, although we recognise that the 10% is a minimum it should be for the developer to decide whether to go beyond this figure not the Council. It is important to remember that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite or a significant reduction in the developable area – a far more expensive option that could render a site unviable without a reduction in other policy requirements.

The council should therefore not require a BNG of greater than the 10%.

Thank you for the opportunity for comment.

Yours faithfully

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Natasha Styles
Group Planning Associate