Places for People
305 Gray's Inn Road
London
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Date: 30th May 2025

By email

BIODIVERSITY NET GAIN (BNG) EXEMPTION
THACKRAY CLOSE, HUNTINGDON

E3P were commissioned by Places for People to produce a Biodiversity Exemption Statement for 'Thrackray Close, Huntingdon', hereafter referred to as 'the site'. The assessment is based on the information and the Site Location Plan (Places for People dated 5th July 2024) provided by the client.

On 12 February 2024, Biodiversity Net Gain became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) for the majority of planning applications submitted after this date. This meant that most developments, listed under the Town and County Planning Act, are now required to deliver a minimum 10% biodiversity net gain as result of their proposals.

As per the Biodiversity Gain Requirement (Exemptions) Regulations 2024, there are seven exemptions that would result in a development not being required to meet this statutory requirement. These are as follows:

- **De-minis threshold** - The development does not impact a priority habitat and impacts less than 25 square metres of non-priority onsite habitats and 5m for non-priority onsite linear habitats.
- **Householder development** – The development applies to an existing house or within the curtilage of a single dwelling. This does not include development, where there is an increase of dwellings within an existing curtilage.
- **Biodiversity gain sites** – Where an off-site biodiversity gain project requires planning permission. This covers developments which are solely enhancing biodiversity onsite to achieve BNG or undertaken to fulfil a BNG condition while permitting the public to use the site.
- **Small-scale self-build and custom housebuilding** – This exemption covers only those developments that encompass less than 10 dwellings in an area no larger than 0.5 hectares and consist of self-build or custom houses, as defined in Section 1(A1) of the Self-build and Custom Housebuilding Act 2015.
- **High Speed Railway Transport Network (HS2)** - Developments relation to HS2,
- **Urgent crown developments** – Development granted planning permission under section 293A of the Town and Country Planning Act.
- **Development order** – Development granted planning permission by a development order under section 59.

The project proposed is the demolition of the existing garage blocks and the creation of a car park within their footprint.

The red line boundaries encompass two garage block with one consisting of four garages and the other six, with access to the red line boundary from an existing hardstanding entrance.

Following a site visit on the 16th May 2025, one elder sapling, with a diameter at breast height of less than 7.5cm, was noted to be growing against the northern wall of the six-garage block. No further vegetation was noted within the red line boundary or within the access to the site.

While a mature tree was identified 5 m from the eastern site boundary, the proposed demolition will not impact the feature.

See **Figure 1 and 2** for an overview of the garage blocks within site boundary and the access road connecting them. While **Figure 3** shows the individual elder sapling present on the north wall to the western garage block.

Figure 1 **Showing Eastern Four Garage Block**



Figure 2 **Showing the Western Six Garage Block**



Figure 3 Showing the Elder Sapling on the Northern Site Boundary



Taking into account the above, it is considered that the proposal would meet the exemption criteria of the de-minis threshold. Therefore, the proposal would be exempt from delivering a minimum 10% biodiversity net gain as part of the works.

Should you require any additional information or clarification pertinent to the conclusions, please do not hesitate to contact me.

Yours sincerely,
For and on behalf of E3P Ltd

Samantha Pritchard
Principal Ecologist