

Gloucester City Plan Examination

Matter 4 – Conserving and Enhancing the Natural and Historic Environment

Participant Statement by Savills on behalf of L&Q Estates

- 35. Should explicit reference be made to blue, as well as green infrastructure within the GCP? Are all relevant designated sites identified on the Policies Map? If not, should they be?**

No comment.

- 36. Has an appropriate approach been taken to achieving biodiversity net gain within policies B4, E2, E3, E4 and E5? Is there any conflict between the delivery of development and the policies? Should reference be made to British Standards 5837:2012 within Policy E4 and Building with Nature standards within Policy E5? What is the status of Building with Nature standards? Specifically, is the wording of policy E5 consistent with that of policies INF3 and SD9 of the JCS and what does commensurate mean in the context of this policy?**

- 37. Is there any duplication between policies C5, E2, E8 and SD9 of the JCS? Are the policies justified and supported by robust and up to date evidence, consistent with recent case law and the provisions of the Conservation of Habitats and Species Regulations 2017?**

We agree that there is an element of duplication across the policies, and indeed with national policy from the NPPF which adds unnecessarily to the draft Plan. We make the following suggestions:

Policy E1

We consider that the entire second paragraph is unnecessary. Trees and hedgerows are considered separately under draft Policy E4, and the reference to 'areas of green (not otherwise protected) but which contributes to local landscape character' is fairly broad in its application. We consider that the reference to protecting and enhancing features of the local landscape within the proceeding paragraph achieves the objective of this element of the policy.

Policy E2

Paragraph 1 - We have reviewed the Gloucestershire Local Nature Partnership's website, and have not been able to ascertain a clear set of objectives through which development proposals would be considered.

Paragraph two, 'In exceptional circumstances...', is not consistent with national planning policy. The NPPF sets out exceptional circumstances in regard to nationally and internationally important designations only (see paragraph 175)

We note a concern in regard to the final paragraph of #3.5.9, and the indication that the appropriate type and level of provision is for the City Council and consultation bodies. The draft Plan should set out the framework for future development, and the role of the City Council is to assess development proposals against the adopted policies. We assume this is the intention of the paragraph, and that there is not the indication that there may be a separate process through which the Authority and statutory consultees would prescribe conditions on a development site prior to proposals coming forward. We suggest that this sentence is removed.

We support the reference to delivery of net biodiversity gain, and note that legislative requirements are

anticipated in the near future. Notwithstanding this, we suggest explicit reference is made to the calculator which the Authority will be using for measuring net gain in the interim; recognising that the Environment Bill has been consistently delayed.

Policy E4

Whilst we recognise the multi-functional benefits of green infrastructure, biodiversity net gain doesn't necessarily directly correlate with 'unavoidable significant adverse impact on trees, woodlands and hedgerows'; and we suggest that linking these through a policy is not an appropriate response. Notwithstanding this, Policy E2 already requires bio-diversity net gain, and as such, its inclusion within Policy E4 is unnecessary.

Policy E5

We do not object to the imposition of Building with Nature standards in-principle provided there remains a degree of flexibility. We note that the explanatory text (at paragraph 3.5.28) references equivalent standards, but this is not in the policy itself, and no explanation is given as to what equivalent standards may be considered acceptable.

Building with Nature is a private company. To go through the assessment process, a third party accredited assessor must be paid to undertake an assessment, or they deliver training sessions to local authorities. As a policy requirement, we assume that Policy E5 is requiring developers to set out compliance in accordance with the Building with Nature standard, and the Authority will then undertake the assessment as part of the planning application process in a similar manner as Buildings for Life standards.

- 38. As written do policies E2 and E8 adequately consider the impact of both air pollution and recreation on the integrity of the Cotswold Beechwoods SAC and other relevant sites?**
- 39. Are the mitigation costs related to recreation impacts justified, reasonable and directly related to development? Is it necessary for individual sitespecific projects to undertake individual Habitat Regulations Appropriate Assessments?**
- 40. What certainty is there that policies E2 and E8 together with 'on- going dialogue with NE and neighbouring LPAs through relevant reviews of the JCS, and local GCPs of adjoining Gloucestershire authorities' will be consistent with the findings of the Dutch Nitrogen case?**

We have no detailed comments to make in regard to these questions; recognising that L&Q's interest in Land at Whaddon will be required to undergo Appropriate Assessment as part of the emerging Stroud Local Plan, and will likely require a bespoke mitigation strategy given its scale. We are interested in the forthcoming Cotswold Beechwoods SAC Report referenced by the Authority, and may provide further comment on this at the Examination.

41-47 – Heritage

No comments.

Savills

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