



Gloucestershire
Wildlife Trust

Gloucestershire Wildlife Trust
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Planning Policy
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Sent by email: cityplan@gloucester.gov.uk

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Gloucestershire Wildlife Trust response to Gloucester City Plan modifications consultation: 30/06/2022

Policy C3: Paragraph 3.3.20 in submitted plan

In addition to the text added under the first point, this should also state there should be no significant determinantal impact on ecological networks.

Policy E3 (now E2)

We note that reference to the Local Nature Partnership (LNP) has been removed. As a key figure in the delivery of the local nature recovery network, a key part of the Government's 25 Year Environment Plan and as per paragraph 25 of the NPPF, which requires strategic policy making authorities to engage with LNPs, reference to the LNP should be included.

Policy E5 (now E3)

We are disappointed to see removal of the Building with Nature Standards as the recognised standards for green infrastructure in the modified GCP. The standard has great success in delivering high-quality green infrastructure schemes.

The current wording (new paragraph 4.5.16) does not provide clarity to developers of a suitable recognised framework, which is likely to lead to poorer green infrastructure development. Wording such as *'Major development proposals will be designed in accordance with recognised standards, for example, Building with Nature'*, would address this and is something we strongly recommend. Note that the Building with Nature website link is incorrect and should read www.buildingwithnature.org.uk.

Policy E6 (now E4)

We support the additional text on both natural flood management techniques and natural upstream flood management and the multiple benefits it can deliver.



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Policy E4 (now E7)

We welcome the explicit wording around all new streets being tree lined. We would recommend adding additional text here on planting the right tree in the right place and ensuring appropriate monitoring and management of newly planted trees.

We also support the addition of wording around developers being dissuaded from using exclusion netting and being encouraged to either retain woodland features or undertake works at appropriate times of year.

Policy F2

We suggest the following wording is added to the 4th point on page 83. 'Incorporate well-designed, suitable, and functional areas of public open space and amenity land **that aligns with the ecological network.**'

Policy F3

We support the additional wording on lighting normally not being permitted that would have a detrimental impact on wildlife. We would suggest this is strengthened by removing 'normally' to further encourage developers to seek out options for mitigating lighting impacts at an early stage. Additional text, to consider locations that are particularly sensitive to lighting, including around historic buildings, natural green spaces and key ecological corridors, could be added to strengthen the current wording.



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