

Matter 1

4. Has appropriate account been taken of the Cotswolds Area of Outstanding Natural Beauty (AONB) and other natural and historic environment designations within the appraisal and the alternatives assessed

Data used to inform objective SA7 ‘To create, protect, enhance, restore and connect habitats, species and/or sites of biodiversity or geological interest’, as per Sustainability Appraisal Report for the Stroud District Local Plan Review – Pre-submission Draft Local Plan (LUC, May 2021) is as follows: Ramsar sites, SPAs, SACs, SSSIs, NNRs, Key wildlife sites, Green spaces, Country parks and Protected outdoor play spaces.

Objective SA7 does not consider Nature Recovery Network mapping (Version: 1.2 June 2020 Beta - working draft version, Gloucestershire Nature Partnership) which was available well before publishing of the SA. This data aims to show the prioritised distribution of opportunities for creating a more resilient network of habitats for people and nature. Therefore SA methodology is in direct conflict to Delivery Policy ES6 ‘Providing for biodiversity and geodiversity’, which states that the wider valuable natural environment includes not only nationally protected species and sites, but also... other features of nature conservation value, including...areas of habitat with restoration potential (particularly those identified on the Gloucestershire Nature Map or identified through other landscape scale projects and within any ‘Nature Improvement Area’ recognised by the Local Nature Partnership.

By not accounting for all available data the SA and therefore Local Plan are predetermining development in areas that should otherwise be excluded on policy grounds.

Matter 6d Cam and Dursley site allocations

32a. Some of the representations raise concerns about other issues relating to the development of the site, including lack of local facilities and services, flooding, impact on landscape/AONB and loss of wildlife. Have such factors been suitably assessed as part of the process to allocate this site?

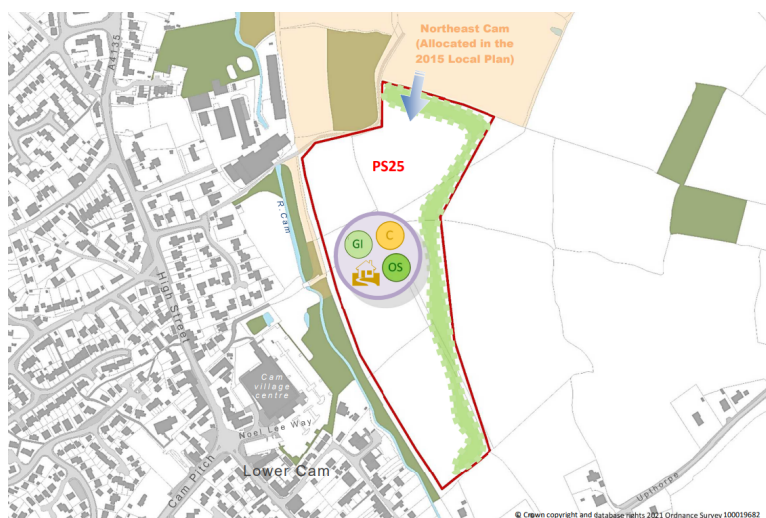


Figure 1 PS25

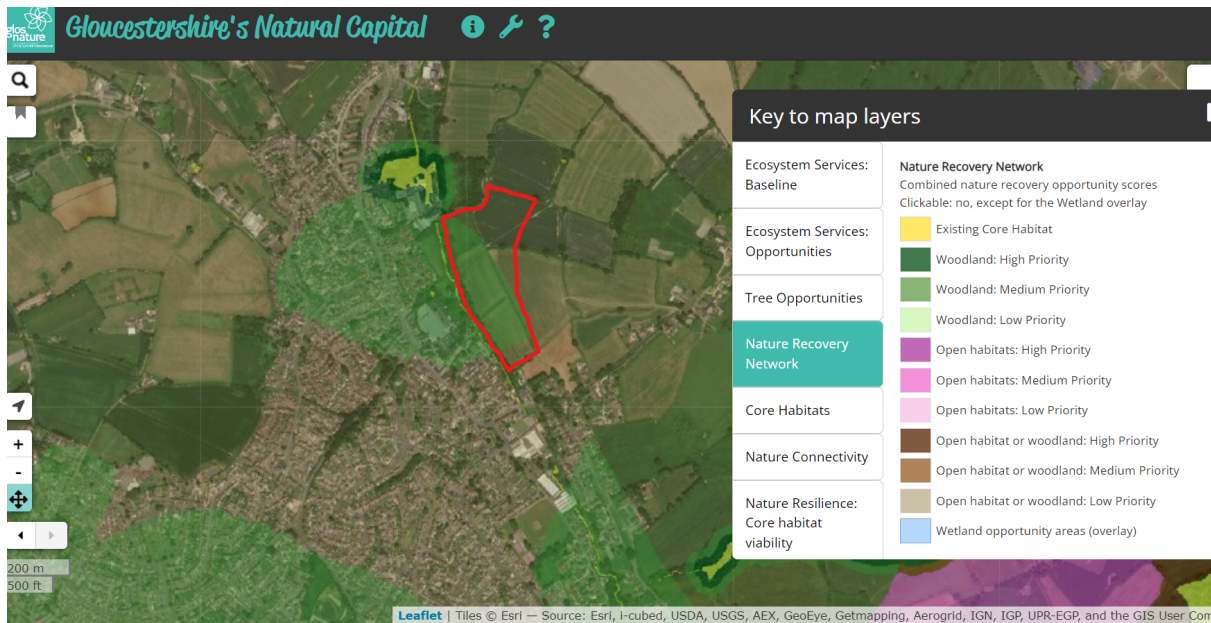


Figure 2 Extract from Gloucestershire Natural Capital Mapping Project managed by Gloucestershire Local Nature Partnership (GLNP) showing majority of PS25 designated for woodland opportunity in the Nature Recovery Network

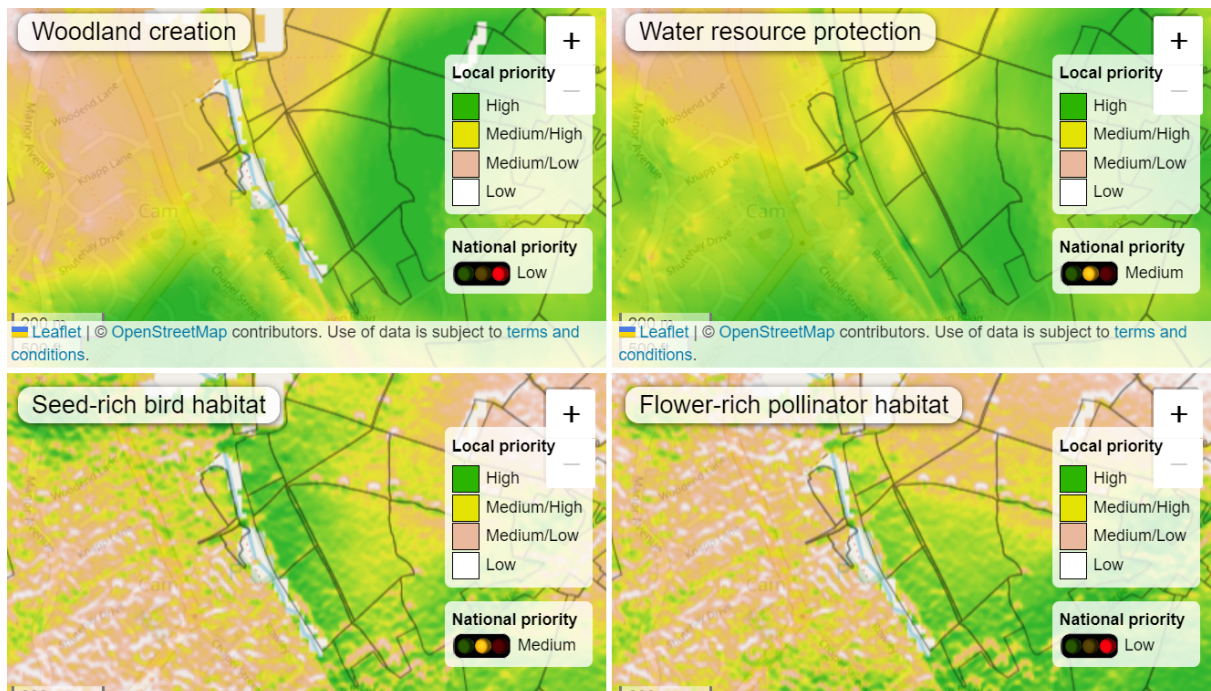


Figure 3 Extract from Centre for Ecology and Hydrology (CEH) e-planner showing the PS25 area (and wider area to east) as a local priority for woodland creation, water resource protection, seed-rich bird habitat and flower-rich pollinator habitat.

Allocation of PS25 (Figure 1) is in direct conflict with multiple elements of Delivery Policy ES6 - Providing for biodiversity and geodiversity

Development proposals shall provide a minimum of 10% net gain in biodiversity through enhancement and creation of ecological networks within and connecting with those beyond the district by:

1. Incorporating and enhancing existing and creating new biodiversity features within their design; and

Given the extent of existing identified biodiversity opportunities (Figure 2 and 3) occupy the majority of the PS25 area there is little spatial context for development at this location

2. Maximising opportunities to enhance and create links between ecological networks and habitats of principal importance. Links should be created both on-site and, where possible, with nearby features; and

Given the extent of existing identified biodiversity opportunities (Figure 2 and 3) occupy the majority of the PS25 area there is little spatial context for development at this location

4. Development proposals within, or in close proximity to, an ecological network corridor should enhance the functionality and connectivity of the corridor. Development that would impact on the strategic ecological network causing fragmentation or otherwise prejudice its effectiveness will not be permitted.

The most appropriate use of the PS25 area given its existing identified biodiversity opportunities (Figure 2 and 3) that are otherwise underrepresented in the surrounding locality is to enhance the functionality and connectivity of ecological networks. To allow development would impact of future resilience of the strategic ecological network causing fragmentation or otherwise prejudice its effectiveness.

Where development is considered necessary, adequate mitigation measures or, exceptionally, compensatory measures, will be required, with the aim of providing an overall improvement in local biodiversity and/or geodiversity.

To allow development would impact of future resilience of the strategic ecological network causing fragmentation or otherwise prejudice its effectiveness in improving local biodiversity.

Development should not adversely affect:

...Local ecological or Green Infrastructure networks.

To allow development would adversely affect actual and identified potential local ecological and GI networks (Figure 2 and 3).

The wider valuable natural environment includes not only nationally protected species and sites, but also... other features of nature conservation value, including...areas of habitat with restoration potential (particularly those identified on the Gloucestershire Nature Map or identified through other landscape scale projects and within any 'Nature Improvement Area' recognised by the Local Nature Partnership

The PS25 area has been identified on the Nature Recovery Network by the GLNP (Figure 2) and the E-planner by CEH (Figure 3) as an area of habitat with restoration potential compared to the surrounding land

The Council is working with the Gloucestershire Local Nature Partnership (LNP) to deliver a Local Nature Recovery Strategy (LNRS), which will provide a spatial strategy for nature. It will identify opportunities and priorities for enhancing our natural environment in Gloucestershire and assist implementation of the Nature Recovery Network (NRN) and ecosystem services. Local Nature Recovery Strategies (for delivering the Nature Recovery Network) will enable opportunities for the

delivery of multiple benefits to be identified and should provide the best value for time and money invested.

It is vital that all stages of sustainable development are informed by relevant ecological information, from site selection and design to planning decisions and long-term management.

A spatial strategy for nature in Gloucestershire already exists in the form of the Nature Recovery Network (Version: 1.2 June 2020 (Beta - working draft version) by the GLNP (Figure 2), created using established spatial modelling methodologies, and therefore should already be being used to inform site selection. Other modelling in the form of the e-planner by CEH (Figure 3) also exist.

The National Trust (304) raised comments on ES6 urging SDC to “Ensure that the Plan’s allocations do not conflict with Natural Capital/Nature Recovery Network mapping and implementation” to which SDC responded “The Council will further consider the Natural Capital and Nature Recovery Network aspects at the planning application stage.” To not account for Natural Capital and Nature Recovery Network aspects at the allocations stage is predetermining the process to fail.

Combined these are all important considerations that certain land is best allocated for other function other than development, and to ignore this information at the allocation stage would undermine commitments to effective use of Natural Capital in the delivery of ecosystem services. Other land has comparatively less Natural Capital value and would be far better suited to development e.g. PS24 with offsets secured to enhance areas with more Natural Capital value i.e. PS25 and adjacent land.