

CHELTENHAM
BOROUGH COUNCIL

**Draft Nature Recovery
Supplementary
Planning Document
(SPD)**

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1. Introduction

What is this document?

- 1.1 A Supplementary Planning Document (SPD) is a document which details and guides the policies already within the local authority's Development Plan. In this context, the Development Plan for Cheltenham Borough comprises the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031 (the JCS, adopted December 2017), the Cheltenham Plan (adopted July 2020) and remaining, yet to be replaced 'saved' retail policies¹ of the Cheltenham Plan Local Plan Second Review (adopted June 2006). Although not part of the Development Plan, this SPD is a material consideration for schemes linked to the topics of its contents, including biodiversity, BNG, ecology, nature recovery, trees, sustainable drainage, and green infrastructure.
- 1.2 The Joint Core Strategy (JCS) and the Cheltenham Plan were produced in the context of the National Planning Policy Framework (NPPF) at the time of their production. There were relevant changes to nature legislation afterwards, such as the strengthening of the biodiversity duty, the introduction of the BNG framework, and the production of Local Nature Recovery Strategies (LNRSs) through the Environment Act 2021.
- 1.3 Research shows that a minimum 10% BNG is required to prevent biodiversity degradation, therefore additional steps and guidance are required to make the most out of the biodiversity component of different developments. This SPD forms part of Cheltenham Borough Council's response to the climate and biodiversity crisis, the environmental objectives of the NPPF, the Environment Act 2021 and the recently published Gloucestershire LNRS.
- 1.4 This SPD sets out why biodiversity and nature recovery are important, the current planning policies related to nature recovery, what Cheltenham Borough Council expects to be delivered for nature recovery in planning proposals, and how this will be secured long term to deliver for nature. This document is targeted at those who intend on making the most out of the biodiversity components of their planning schemes. This document assumes that the relevant parts of the Development Plan have been previously read. This SPD should also be read in conjunction with the [Climate Change SPD](#).

¹ There is also one policy (GE 1 Public Green Space), which is 'saved'

Cheltenham's biodiversity

- 1.5 Cheltenham is a spa town and Borough on the edge of the Cotswolds in Gloucestershire. The town is home to a variety of green spaces and nature reserves, ranging from formal gardens to Local Nature Reserves (LNRs). All these spaces are important for maintaining biodiversity. Seven formal parks in Cheltenham have achieved Green Flag awards indicating their high quality in terms of public access and biodiversity conservation, and Cheltenham is home to; Pilley Bridge LNR and Griffiths Avenue LNR (see Figure 1). Cheltenham's most important green asset for biodiversity is Charlton Kings Common and Leckhampton Hill, the latter of which is now designated as a national nature reserve and also as a Site of Special Scientific Interest (SSSI) due to the biological interest of the unimproved calcareous grassland found on the sites, and their geological exposures (see Figure 2). Cheltenham is also home to Badgeworth SSSI which is primarily designated to protect one of only two known UK locations of the Adder's-tongue Spearwort (*Ranunculus ophioglossifolius*), commonly known as the "Badgeworth buttercup". This rare, protected plant thrives in the site's unique, seasonally wet, and clay-based grassland habitat.
- 1.6 Cheltenham Borough Council believes it is vital that we **protect, enhance and grow the biodiversity throughout our urban and rural environments**. Cheltenham is drained by several small rivers and streams which flow through the town, most notably the River Chelt. The watercourses in Cheltenham eventually contribute to the Severn River which lies to the west of Cheltenham.

Figure 1. Map of Green Spaces, Parks, LNRs, SSSI, Area of Outstanding Natural Beauty (AONB), and rivers in Cheltenham (River Chelt labelled specifically)

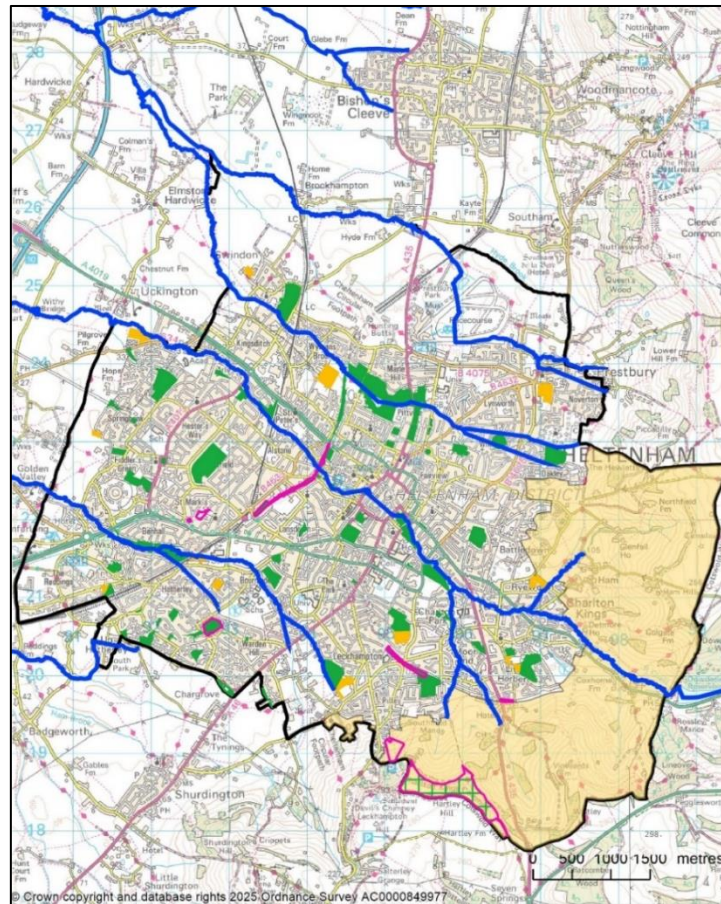


Figure 2. Calcareous grassland on Charlton Kings Common and Leckhampton Hill, Cheltenham

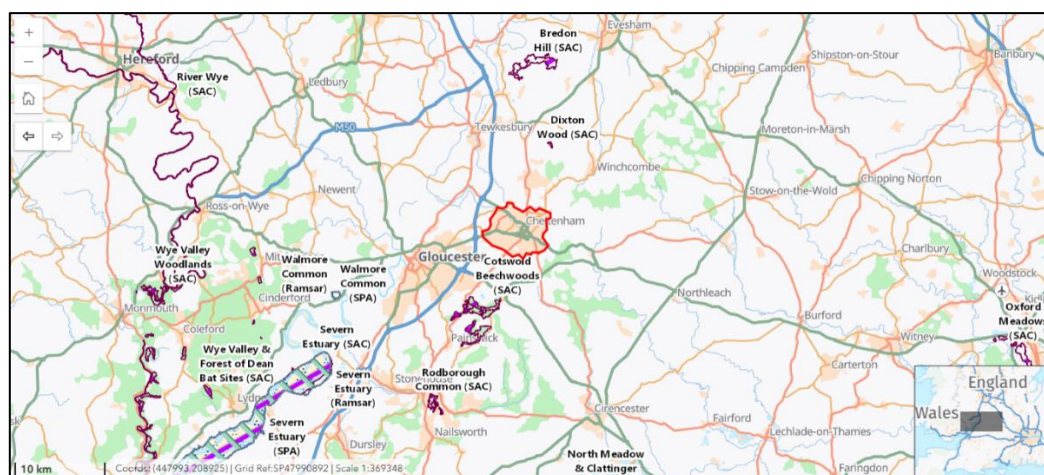


1.7 The Cotswolds National Landscape Area (previously called the Area of Outstanding Natural Beauty) lies to the east and south of Cheltenham. The Cotswolds are primarily formed of Jurassic limestone, in Cheltenham the underlying rocks to the town are the Lias group which are siltstone, sandstone, limestone and mudstones except in the east of the borough. The soils in Cheltenham area are therefore typically slightly alkaline, derived from the underlying limestone conditions. The type of grassland found in and around Cheltenham, given its limestone geology and soils, is calcareous grassland, also known as limestone grassland or Cotswold grassland. This is a UK Biodiversity Action Plan priority habitat which is important for biodiversity and maintaining the ecological character of Cheltenham.

1.8 There are multiple internationally designated sites of nature conservation importance, or Natura 2000 sites surrounding Cheltenham (see Figure 3). These are Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar convention sites. These are:

- i. The Severn Estuary Ramsar/SAC/SPA;
- ii. Cotswolds Beechwoods SAC;
- iii. Rodborough Common SAC;
- iv. Dixton Wood SAC;
- v. Bredon Hill SAC, and
- vi. Walmore Common RAMSAR/SPA.
- vii. Cleeve Common SSSI

Figure 3. Cheltenham (outlined in red) in relation to Natura 2000 sites (Source: MAGIC Map, DEFRA, 2025)



1.9 There are many opportunities to protect, enhance, and grow the biodiversity in Cheltenham, and for developers to incorporate these aims into their development plans. The basis of this lies in national and local context, as well as the global biodiversity and climate crisis.

The National Context of Improving Biodiversity

1.10 In response to the universally recognised need to reverse biodiversity loss, the UK Government published a 25-year Environment Plan (25YEP), 'A Green Future'² in 2018, to:

² 25 Year Environment Plan (2018) UK Government:
<https://assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf>

“Champion sustainable development, lead in environmental science, innovate to achieve clean growth and increase resource efficiency to provide benefits to both our environment and economy, and keep our pledge to hand over our planet to the next generation in a better condition than when we inherited it”.

1.11 In looking to achieve this, the 25YEP emphasised a number of themes, three of which will be the focus of this Supplementary Planning Document (SPD):

- i. Net gains in biodiversity,
- ii. High quality green infrastructure provision and standards, and
- iii. Delivering for wildlife.

1.12 The 25YEP laid the foundation for:

- i. the Environment Act (2021) to tackle biodiversity loss and recover nature through a mandatory 10% Biodiversity Net Gain (BNG) planning policy,
- ii. and for Local Nature Recovery Strategies (LNRS) which will deliver more habitat; in better condition; in bigger patches that are more closely connected.

1.13 The most recent State of Nature report (2023)³ for the UK suggests there has been a steep decline in the abundance of wildlife in the UK since the 1970s. The abundance of 753 terrestrial and freshwater species has on average fallen by 19% across the UK since 1970. The UK distributions of 4,979 invertebrate species have on average decreased by 13%, the distributions of 54% of flowering plant species and 59% of bryophytes (mosses and liverworts) have decreased across Great Britain (see Figure 4). 2% (151 species) are extinct in Great Britain and a further 16% (almost 1,500 species) are now threatened with extinction here.

Figure 4. Source: reproduced from the State of Nature Report (The State of Nature Partnership, 2023)



³ State of Nature Report (2023) The State of Nature Partnership: [TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf](https://www.stateofnature.org.uk/wp-content/uploads/2023/06/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf)

1.14 *Figure visually depicting the statistics stated in 1.14* The State of Natural Capital Report (2024)⁴ shows that all of England's ecosystem assets have been degraded by land and sea-use change, pollution, natural resource overexploitation and climate change. They are therefore less able to cope with the impact of future change and both the assets themselves and the benefits they provide to our society are all at high-risk of further degradation. The report identifies priority actions for policy areas and ecosystem assets (see Figure 5).

⁴ State of Natural Capital Report (2024) Natural England: [NERR137 Edition 1 State of Natural Capital Report for England 2024 - Risks to nature and why it matters.pdf](#)

Figure 5. "Priority actions for reducing risks to natural capital". Source: reproduced from the State of Natural Capital 2024 report (Natural England, 2024)



The Local context of improving biodiversity

- 1.15 Cheltenham Borough Council (CBC) declared a climate emergency in July 2019 and published the [Climate Change Supplementary Planning Document \(SPD\)](#) in 2022, setting out Cheltenham Borough Council’s ambitions for all developments within the borough and how they should respond to the climate change and biodiversity crisis. Gloucestershire is a nature-depleted county like much of the UK⁴, and Cheltenham has a host of opportunities to protect, restore and enhance its biodiversity.
- 1.16 All public authorities have a Biodiversity Duty, meaning to deliver plans, partnerships and actions to conserve and⁵ enhance biodiversity. A baseline for this duty is set out in

⁵ Gloucestershire Wildlife Trust (2024). Create a wilder Gloucestershire with us: <https://www.gloucestershirewildlifetrust.co.uk/campaign-wildergloucestershire-us-0>

Cheltenham Borough Council's [First Consideration Report \(2024\)](#), which includes delivering this SPD as one of our commitments.

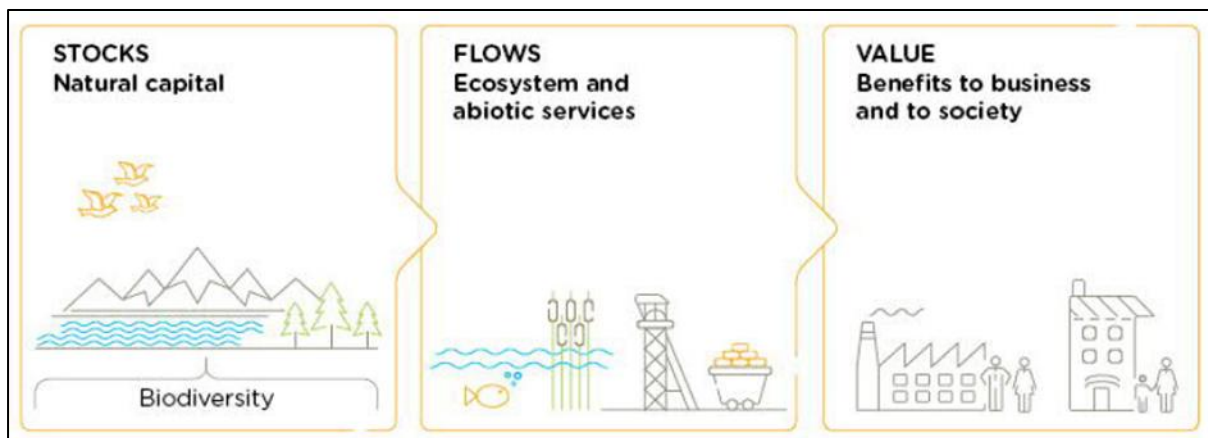
- 1.17 To address biodiversity degradation, [Cheltenham Borough Council's Corporate Plan 2023-2027](#) sets the task to *'Develop an Ecology and Biodiversity Supplementary Planning Document to further support sustainable development'*. Key Priority 2 states that *'we can position ourselves to offer advice and share best practice, signposting to other leaders along the way, making it easier for others to follow.'*

2. What is Biodiversity and Nature Recovery, and why are they important?

What is biodiversity?

- 2.1 To understand the importance of biodiversity, we must understand and have an appreciation for natural capital and ecosystem services. Natural capital encompasses the Earth's stock of both renewable and non-renewable natural resources, including plants, animals, air, water, soils, and minerals. Ecosystem services are the benefits that humans derive from these natural resources. These services include essential functions such as pollination, flood risk mitigation, and air purification. Essentially, ecosystem services represent the value that humans gain from the natural environment and properly functioning ecosystems (see Figure 6).

Figure 6. Natural Capital, ecosystem services and biodiversity



- 2.2 Biodiversity refers to the variety of life forms within natural capital. It is inherently valuable and plays a crucial role in sustaining ecosystem services. The quantity and quality of biodiversity can serve as indicators of the health of natural capital stocks and the effectiveness of the ecosystem services they provide.
- 2.3 Despite being fundamental to our existence, the world is losing its biodiversity at an ever-increasing rate. It is vital that we maintain and increase biodiversity in order to maintain the scale and resilience of ecosystem service delivery and the benefits communities receive as a result.

What is Nature Recovery?

- 2.4 Nature recovery refers to the process of restoring and revitalising ecosystems that have been degraded or lost due to human activity, climate change, or other factors. It involves regenerating natural habitats, creating new ones and protecting them (and the species they support) from degradation. The goal is to create healthier, more resilient environments that can support a wide variety of species on a large scale. Nature recovery is important for a number of reasons, all of which contribute to the overall health of the planet and the well-being of its inhabitants. These reasons are:
- i. **Biodiversity Conservation:** Many ecosystems and species are threatened by habitat loss, pollution, and climate change. Nature recovery helps restore these ecosystems, providing a safe haven for endangered species and ensuring a rich diversity of life;
 - ii. **Climate Change Mitigation:** Healthy ecosystems, such as forests, wetlands, and grasslands, act as carbon sinks absorbing carbon dioxide from the atmosphere. Restoring these environments can help mitigate the impacts of climate change by reducing greenhouse gas concentrations;
 - iii. **Ecosystem Services:** Nature recovery restores critical ecosystem services like water purification, soil fertility, and pollination. These services are essential for food production, clean water, and overall human health, making nature recovery vital for sustainable development;
 - iv. **Resilience to Natural Disasters:** Restoring ecosystems like riparian zones, wetlands, and forests enhances natural buffers against flooding, storms, and erosion. Healthy landscapes are more resilient to extreme weather events and provide safer, more stable environments for communities;
 - v. **Human Well-Being:** Access to nature improves mental and physical health by providing spaces for recreation, relaxation, and connection with the natural world. Nature recovery is in the public interest as can create more green spaces in urban areas, improving quality of life and promoting social cohesion, and.
 - vi. **Sustainability:** Nature recovery helps balance the needs of development with the preservation of natural resources. By restoring ecosystems, we ensure that future generations can continue to rely on healthy, functioning ecosystems to meet their needs.
- 2.5 In essence, nature recovery is crucial for maintaining the delicate balance between human progress and environmental health, ensuring a sustainable future for both people and the planet.

3. Legislation and planning policy

- 3.1 A comprehensive framework of international, national, and local policies and legislation exists to protect and enhance biodiversity. These emphasise the importance of safeguarding existing biodiversity, implementing enhancements, and achieving a measurable net gain in biodiversity through the planning process. This commitment is reinforced by a robust legislative framework that includes protections for species and sites of ecological significance, the requirement for 10% BNG, and the establishment of LNRS.

Legislation

- 3.2 The primary pieces of legislation relating to biodiversity and nature conservation in England are:
- i. [The Environment Act 2021\(as amended\)](#) - This made provision for the introduction of the mandatory 10% BNG policy, to ensure developments covered by the Town & Country Planning Act (1990) deliver an increase in biodiversity value post-development. This Act also introduced a statutory requirement for LNRS' to be produced by responsible authorities appointed by the Government;
 - ii. [Natural Environment and Rural Communities Act \(NERC\) 2006 \(as amended\)](#) - Local Planning Authorities (LPAs) have a statutory duty to have regard to conserving biodiversity insofar as it is consistent with the discharging of their normal duties;
 - iii. [The Conservation of Habitats and Species Regulations 2017 \(as amended\)](#) (often referred to as the 'Habitat Regulations') – This is the mechanism by which the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora (otherwise known as 'the Habitats Directive 1992') is implemented in the UK, and
 - iv. [The Hedgerow Regulations 1997 \(as amended\)](#) – Protects all hedgerows meeting the criteria for 'importance' from removal with certain exemptions.
 - v. [The Water Framework Directive 2017 \(updated 2022\)](#)
 - vi. [The Salmon and Freshwater Fisheries Act 1975](#): Consolidates the Salmon and Freshwater Fisheries Act 1923 and certain other enactments relating to salmon and freshwater fisheries and repeals certain obsolete enactments relating to such fisheries.
 - vii. [Wildlife and Countryside Act 1981](#): the Wildlife and Countryside Act 1981 Is up to date with all changes known to be in force on or before 02 March 2026. There are changes that may be brought into force at a future date.

National policy

- 3.3 The [National Planning Policy Framework \(NPPF\)](#) sets out how the Government intends the planning system to operate when determining planning applications and in preparing Local Plans. The NPPF has a range of requirements relating to biodiversity in Chapter 15 that are relevant to this SPD.

Local policy

- 3.4 Cheltenham Borough Council has development policies relating to nature recovery and green infrastructure in both the JCS and the Cheltenham Plan (CP). Figure 7 below presents a summary of the guiding principles of Cheltenham’s local biodiversity policies, and the Geographical Information Systems (GIS) that can be used.

Figure 7. Nature recovery policies from the Development Plan

Policy	Source	Guiding principles	GIS framework
SD7	JCS, page 54	<ul style="list-style-type: none"> • Cotswold National Landscape Management Plan • Cotswolds Nature Recovery Plan 	Interactive Landscape Character Map
SD9	JCS, page 59	<ul style="list-style-type: none"> • Connected urban network • Coordination with multi-purpose green infrastructure • Design with habitat in mind • Consideration of protected sites 	Gloucestershire interactive Local Habitat Map Gloucestershire Natural Capital
INF2	JCS, page 80	<ul style="list-style-type: none"> • Inclusion and consideration of ponds • Sustainable Drainage Systems and ensuring rainwater permeability • Avoid discharges into the public system • Integration of watercourses • Control of the Himalayan Balsam invasive species 	Flood maps including groundwater flooding
INF3	JCS, page 84	<ul style="list-style-type: none"> • Connection of strategic assets such as the Cotswolds National Landscape, River Severn and its washlands, rivers, floodplains, pedestrian and cycle routes. • Connection of local assets such as parks, private gardens, recreation grounds, amenity space, play space, allotments, woodlands and orchards • On site first • Maintenance commitments • Living roofs and green walls 	Public Rights of Way (PROW), green space study map, allotments, TPOs, cycle routes

GI 2	CP, page 84	Cheltenham Tree Strategy	Tree Preservation Orders (TPOs)
GI 3	CP, page 86	Cheltenham Tree Strategy	Tree Preservation Orders
BG 1	CP, page 44	Cheltenham Suitable Alternative Natural Greenspaces (SANG) Action Plan	Map in November
BG 2	CP, page 45	Cheltenham Suitable Alternative Natural Greenspaces (SANG) Action Plan	Map in November

4. Biodiversity Net Gain (The Environment Act 2021 (as amended))

The Environment Act 2021 (as amended) mandates that new development must achieve a minimum 10% net gain in biodiversity (also referred to as Biodiversity Net Gain⁶) calculated using the [DEFRA Statutory Biodiversity Metric](#). How this will be achieved is detailed through an approved Biodiversity Gain Plan (BGP). It also mandates the use of the BNG User Guide and the trading rules.

- 4.1 For the purposes of calculating BNG, biodiversity ‘units’ are calculated in the Statutory Biodiversity Metric, using habitats as a proxy for biodiversity. Species present on a site do not factor into the BNG calculation, though protected species legislation still applies separately to the requirements of BNG. This means that species afforded legal protection under the [Wildlife and Countryside Act \(1981\) \(as amended\)](#) must still be protected and any potential harm to them adequately mitigated, under license where necessary, regardless of the BNG requirements for a development site. See chapter 9 “Building biodiversity and nature recovery into development” for guidance on how the provision of ecological enhancements on development sites can be made for species, in addition to delivering any measures required under protected species legislation.
- 4.2 In the Statutory Biodiversity Metric, habitats are split up into three groups:
 - i. Area habitats (e.g. grassland, woodland, or scrub);
 - ii. Linear habitats (e.g. hedgerows and lines of trees), and
 - iii. Watercourse habitats (e.g. rivers and streams).
- 4.3 Biodiversity units are calculated within each group. If all three habitat groups are present on a site, 10% BNG has to be achieved in all three groups to achieve an overall 10% net gain in biodiversity.
- 4.4 Specialist BNG pre-application advice is available for applicants who wish to discuss the specific requirements of their development proposals with Cheltenham Borough Council before submission of a planning application. This can cover any of the topics on the Government’s information page on [Biodiversity net gain - GOV.UK](#). 10% BNG can be achieved on site (within the red line boundary of a planning application) by retaining, enhancing or creating habitat, or off-site via offsetting (see Chapter 6 of this SPD).

⁶ ‘Biodiversity Net Gain’ and ‘biodiversity gain’ are used interchangeably by central government. Both refer to the mandatory 10% biodiversity gain policy and its regulations, introduced by the Environment Act 2021.

BNG Exemptions

- 4.5 There are a small number of developments which are exempt from the BNG regulations. BNG exemptions include:
- i. Development that does not impact a priority habitat and impacts less than:
 - ii. 25 square metres of on-site habitat;
 - iii. 5 metres of on-site linear habitats such as hedgerows;
 - iv. Householder applications;
 - v. Self-build and custom build applications considering they fulfil all three criteria listed on the [Planning Practice Guidance](#);
 - vi. Biodiversity gain site (including habitat banks);
 - vii. Other exemptions;
 - viii. High speed rail transport network;
 - ix. urgent crown developments, and
 - x. developments that are granted planning permission by a development order (including permitted development rights).
- 4.6 These developments are however still required to meet Cheltenham Borough Council's Development Plan policies which relate to biodiversity, green infrastructure and open space.

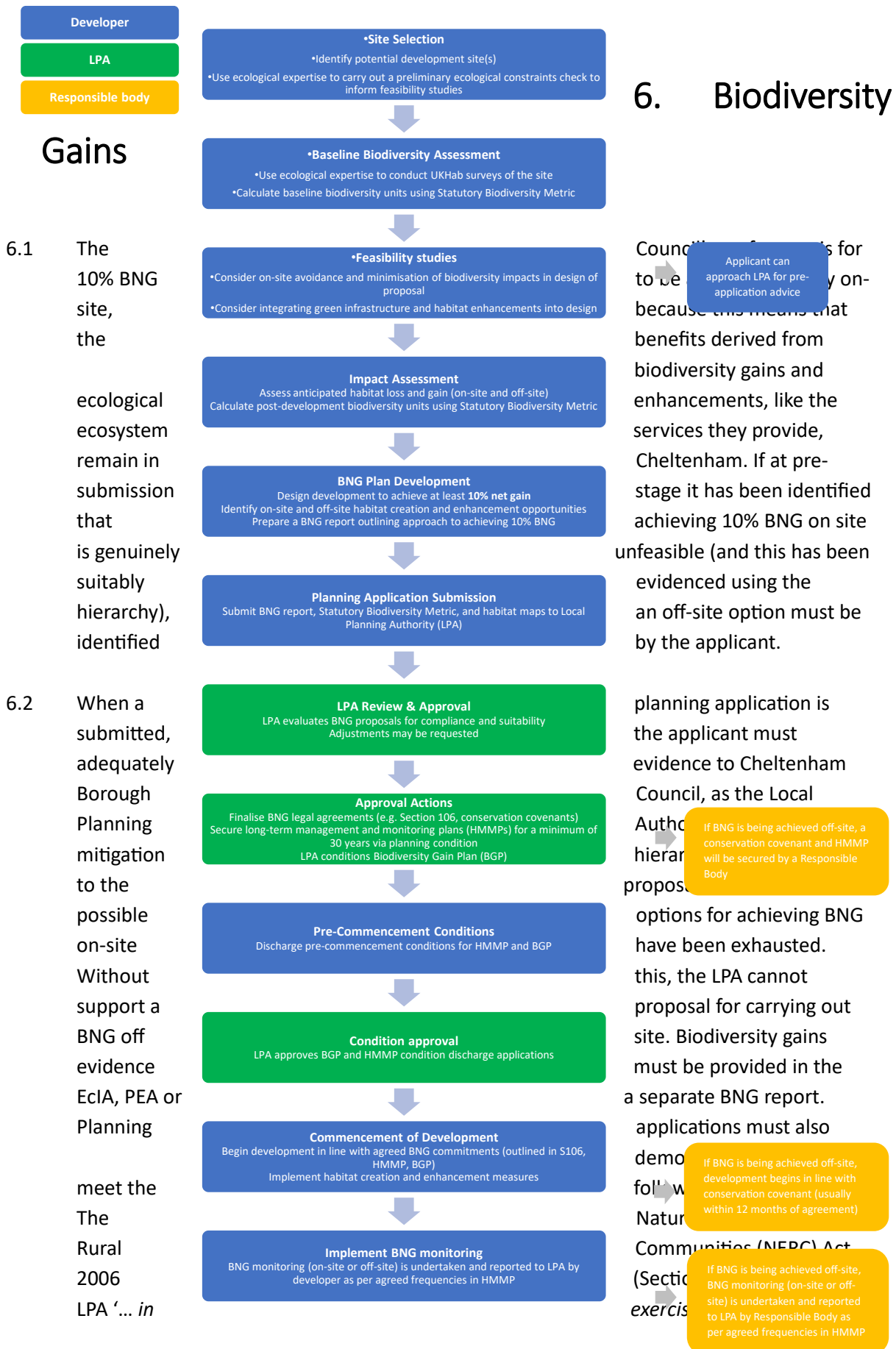
BNG "Small sites"

- 4.7 A development with 9 dwellings or fewer, on less than 1 hectare of land is considered a "small site" under the BNG regulations. The development of small sites still falls under the requirements of the BNG policy, e.g. they still have to achieve a 10% net gain in biodiversity, but their BNG calculations can be made on a simpler version of the Statutory Biodiversity Metric called the "Small Sites Biodiversity Metric". This can be completed by a Competent Person. The DEFRA guidelines on "competent persons" with regards to BNG must be used. Please note that changes to the small sites' guidance are due to take place in 2026.

5. Biodiversity Net Gain and the Planning Process

- 5.1 The mandatory BNG policy needs to be considered in development plans at site-selection/viability stage with the input of suitably qualified ecologists (see Chapter 9 for more information on this).
- 5.2 Pre-submission, the following must be prepared alongside the planning application with regards to BNG:
- i. A Preliminary Ecological Appraisal (PEA) or Ecological Impact Assessment (EiA) with all baseline habitats present on the site (within the red line boundary of the planning application) mapped using [UKHab mapping](#); and
 - ii. A completed Statutory Biodiversity Metric completed by a 'competent person'.
 - iii. The LPA must be satisfied that a minimum 10% net gain will be produced as a result of any development which does not fall under a BNG exemption. Either by a metric and accompanying ecological document or a metric and written confirmation that off-site units will be purchased and why (considering the hierarchy)
- 5.3 Pre-commencement, the following will be required:
- i. A Biodiversity Gain Plan (BGP),
 - ii. A 30-year Habitat Management and Monitoring Plan (HMMP), and
 - iii. A legal agreement to secure the details of the HMMP and monitoring fees for the delivery of 10% BNG on all onsite significant gains and off-site habitat creation.
- 5.4 Please refer to the planning process diagram below (Figure 8), which sets out how the mandatory BNG policy must be considered and applied from development site selection through to development commencement, by the developer, applicant, and the Local Planning Authority (LPA).
- 5.5 For minor development schemes, Gloucester City Council's Biodiversity Net Gain: Small Developments Guide (March 2024) can provide some practical guidance.

Figure 8. BNG in planning process



have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. In order to discharge its biodiversity duty, the LPA must satisfy itself that all developments deliver ecological enhancement wherever reasonably possible; (2) Ecological enhancement is a requirement of the revised National Planning Policy Framework (2024) which states (in paragraph 180) that *'Planning policies and decisions should contribute to and enhance the natural and local environment...'*. And (3) Policy SD9 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031 (2017) which encourages new development to: "contribute positively to biodiversity and geodiversity whilst linking with wider networks of green infrastructure. For example, by incorporating habitat features into the design to assist in the creation and enhancement of wildlife corridors and ecological steppingstones between sites".

Figure 9. What is a habitat bank?

What is a habitat bank?

A habitat bank is an area of land where habitat creation or enhancement has achieved an uplift in biodiversity unit value of the land. The units created can be sold to developers and allocated to their development proposal on a national register, to meet a developer’s BNG requirements.

Figure 10. The difference between biodiversity units and credits

The difference between biodiversity UNITS and CREDITS

Biodiversity units are a measure of natural habitat that is used to assess biodiversity net gain. They are what the Statutory Biodiversity Metric calculates and are a proxy for biodiversity (they do not include protected species).

When achieving 10% BNG on site is not achievable, biodiversity units can be purchased from habitat banks (see Figure 10) to offset the loss of biodiversity units on a development site.

Biodiversity credits are what can be purchased from central government as a last resort to offset the loss of biodiversity units on a development site. They have not been calculated from a specific site using the Statutory Biodiversity Metric. Central government will use the funds from the sale of biodiversity credits to invest in habitat creation or enhancement – see [Statutory biodiversity credits - GOV.UK](#).

- 6.3 The primary objective for delivering off-site BNG is to locate new habitats as close as possible to the development site, ensuring they are functionally accessible for the species they aim to support.

The National Biodiversity Gain Site Register

- 6.4 Habitat Banks used to offset biodiversity losses must be registered on the national biodiversity gain site register and the registered gains allocated to the specific development in question. These are two separate processes. Achievable biodiversity gains will be secured via a binding legal agreement (see chapter 10), and this will be a pre-requisite to registering for the BNG site register.

7. The Gloucestershire Local Nature Recovery Strategy (LNRS) (The Environment Act 2021 (as amended))

- 7.1 LNRS' propose how and where to recover nature and improve the wider environment across England. The requirement to produce an LNRS is set out in the [Environment Act 2021 \(as amended\)](#).
- 7.2 Each LNRS sets out priorities for nature recovery and proposes actions in locations where it would make a particular contribution to achieving those priorities. DEFRA has appointed 48 responsible authorities to lead on preparing a LNRS for their area. Gloucestershire County Council is the responsible authority working with Gloucestershire Nature Partnership who have prepared the Gloucestershire LNRS. Cheltenham Borough Council is one of the supporting authorities for the Gloucestershire LNRS.
- 7.3 LNRS' contain:
- i. A list of priorities for habitats and species across the area they cover, and
 - ii. A collection of maps showing where these priorities should be applied in the area they cover.
- 7.4 With regard to BNG, the LNRS will be the determining factor for setting the strategic location of a habitat in the Statutory Biodiversity Metric (whether this is pre or post-development). If the habitat is within the LNRS, then Strategic significance within the statutory biodiversity metric applies only to certain habitat measures and is not a blanket rule for all LNRS priorities. This incentivises the creation of habitats which have been identified as priorities for the local area in the LNRS on development sites, or on habitat banks if these banks are within a priority area on the LNRS map, as a small multiplier (x1.15) will be added to them in the statutory Biodiversity Metric, thus increasing the overall BNG calculation by a factor of 15%.
- 7.5 The LNRS must be used by developers to plan site-selection, site design, landscaping design, and ecological enhancement plans for their development proposals. The LNRS will be used by Cheltenham Borough Council to inform responses to development proposals. It will be used to secure provision of ecological enhancement for species which the LNRS shows will be impacted by a development proposal, and compensation for the loss of habitats of importance to Gloucestershire which the LNRS also shows will be impacted by a development proposal.

Borough-Wide Ecological Connectivity

- 7.6 Ecological connectivity across the Borough will be addressed strategically through the emerging Gloucestershire Local Nature Recovery Strategy (LNRS). The LNRS, prepared in

accordance with the Environment Act 2021, will identify: Ecological connectivity across the Borough will be addressed strategically through the emerging Gloucestershire Local Nature Recovery Strategy (LNRS). The LNRS, prepared in accordance with the Environment Act 2021, will identify:

- I. Strategic habitat networks across Gloucestershire
- II. Key ecological corridors and stepping stones
- III. Areas of habitat fragmentation and ecological “pinch points”
- IV. Priority opportunities for habitat enhancement and creation

7.7 Within Cheltenham, this strategic approach will help to articulate connectivity between significant ecological assets such as Leckhampton Hill and the River Chelt, including the urban corridor that links these areas. The LNRS mapping will provide spatially defined priorities that extend beyond individual development site boundaries and identify opportunities for coordinated action.

7.8 This guidance therefore requires development proposals to:

- I. Demonstrate how they respond to the spatial priorities and opportunity areas identified in the Gloucestershire LNRS
- II. Contribute to strengthening ecological corridors, particularly where development lies within identified connectivity zones.
- III. Address ecological pinch points where fragmentation currently limits species movement.
- IV. Deliver habitat enhancements that contribute to the wider Nature Recovery Network, rather than solely focusing on site-level mitigation.

7.9 Developers should have regard to LNRS opportunity mapping once adopted and demonstrate how proposals align with borough-wide ecological connectivity objectives. This may include off-site contributions, partnership working, or coordinated habitat delivery where appropriate.

7.10 This strategic alignment will ensure that development contributes to a coherent and resilient ecological network across Cheltenham and Gloucestershire.

8. Cheltenham Borough Council's Tree Strategy (GI2 CP P,83 & GI3 CP P,86)

- 8.1 Cheltenham Borough Council's Tree Strategy plays a vital role in supporting the borough's wider ambitions for nature recovery, as outlined in this SPD. By embedding principles of sustainability, biodiversity, and community engagement, the strategy sets out a proactive and evidence-based approach to managing Cheltenham's trees—recognising them as a critical part of the town's natural capital. At its core is the principle of planting the right tree in the right place, ensuring long-term benefits for wildlife, people, and the urban environment alike. This strategic approach helps safeguard existing tree stock, promotes species diversity, and ensures that both public and private trees are managed and protected in ways that reflect their ecological, social, and climate value.
- 8.2 The Tree Strategy directly supports Cheltenham's nature recovery goals by aiming to increase tree canopy cover, particularly in areas of greatest need, using data-driven insights such as tree equity mapping. In doing so, it enhances local biodiversity by providing habitats for a wide range of species and improving ecosystem resilience. Trees planted and maintained through this strategy will also contribute significantly to Cheltenham's climate mitigation efforts—sequestering carbon, regulating urban temperatures, and reducing flood risk. Furthermore, by improving air quality and providing accessible green space, the strategy contributes to public health and wellbeing. The Tree Strategy also recognises the importance of community involvement and education in supporting long-term environmental stewardship, making it a key pillar of Cheltenham's broader vision for a greener, healthier, and more resilient future.
- 8.3 The Tree Strategy supports the continuity of veteran trees and the need to create future veterans. Veterans and ancient trees are important for biodiversity (deadwood habitat, specialist invertebrates and fungi, cavity-nesting birds and bats) as well as for landscape character.
- 8.4 The aims of the Tree Strategy are to:
- i. **Increase Tree Canopy Coverage:** One of the primary aims is to address the disparity of canopy cover across Cheltenham. This involves looking at a broad range of data including tree equity data and inspection data etc to better inform the location and planting of trees in spaces where they make a social, environmental and economic contribution. This will help to expand canopy cover and contribute to environmental health. This aim will also inform decisions in the planning process to better protect trees on private land. This should be achieved through diversity of species and characteristics of Cheltenham's tree stock.
 - ii. **Enhance Biodiversity:** Trees support a wide range of plant, animal, fungi and bacteria species. A key aim of this strategy, feeding into our Nature Recovery Strategy Supplementary Planning Document, is to increase biodiversity by planting a broad

range of tree species, which provide habitats for wildlife and contribute to ecological resilience.

- iii. **Help Mitigate Climate Change:** Trees are important for absorbing carbon dioxide (CO₂). Cheltenham has a commitment to carbon net zero by 2030. By maintaining and increasing the number of trees that can sequester carbon, and reduce heat island effects in our urban area, we can help mitigate climate change and help regulate our local climate.
- iv. **Improve Air Quality and Mitigate Flood Risk:** Trees act as natural filters, improving air quality by collecting pollutants and releasing oxygen. They also help manage water runoff and reduce the risk of flooding by slowing the flow of rainwater into drains, streams and rivers.
- v. **Enhance Health and Well-being:** Trees are important to our communities. They support both our mental and physical health. Urban trees help create attractive areas, whilst trees in our green spaces enhance these spaces, create areas for recreation, reducing stress, and encouraging outdoor activities.
- vi. **Protect and Maintain Existing Tree Stock:** A key part of any tree strategy is the preservation of existing trees. This involves robust inspection and maintenance, good biosecurity measures and ensuring we plant the right tree for the right place so that full crown potential can be achieved.
- vii. **Protect and Enhance the Historic Environment:** Preservation of ancient and veteran trees within historic parts or gardens important for natural foraging.
- viii. **Promote Education and Awareness:** This aim will help to engage local communities with the broader understanding and a sense of ownership of their environment, and
- ix. **Maximise Funding:** This trees strategy can be used as a lever for funding for future tree management.

9. Building nature recovery into development

(Paragraphs 187, 192 and 193 of the National Planning Policy Framework, and in order for the council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006 as amended by the Environment Act 2021.)

- 9.1 This chapter sets out how nature recovery should be integrated into the planning process, regardless of the scale of a development or whether the mandatory biodiversity gain condition applies to it. Nature recovery can be proactively planned into new development of all kinds and all scales, from individual houses, barn conversions, to masterplans for large residential or road schemes. Building nature recovery into development must be seen as an opportunity not a constraint, because of the environmental benefits derived from increasing natural capital and improving ecosystem services.
- 9.2 There are three key stages prior to the submission of a planning application (or prior to works starting for permitted development projects) where nature recovery must be considered. These are:
- i. Feasibility study,
 - ii. Impact assessment, and
 - iii. Scheme design.

Feasibility study

- 9.3 Feasibility assessments concerning ecological impacts must be a priority from the outset of any proposal, ideally before design and planning application submission. This proactive approach aligns with Cheltenham's Development Plan and ensures compliance with planning application validation requirements. The [CBC validation checklists](#) set out what is required to be submitted with planning applications regarding ecology, trees, and BNG. A planning application will not be validated without meeting these requirements.

Engaging Ecological Expertise

- 9.4 Assessing the feasibility of a project from an ecological perspective requires specialist knowledge. Engaging a qualified ecologist is vital, as comprehensive surveys and assessments will need to be conducted, and appropriate mitigation, compensation, net gain, and enhancement measures integrated into the proposal **prior to submission**. Utilising professional ecological services can prevent costly delays and facilitate a more efficient planning process. The Chartered Institute for Ecologists and Environmental Managers (CIEEM) have a directory of Ecological and Environmental practices which are registered with CIEEM, found here [Registered Practice Directory](#), which can be used to find a suitably qualified ecologists to undertake survey work.

- 9.5 It is also essential that the post-development plans for the provision of green infrastructure/soft landscaping/habitat creation are assessed for their feasibility before these aspects of development proposals are submitted. This must involve assessing the type, condition and/or quality of the soil on a site.
- 9.6 Measures may need to be taken prior to construction to prepare the soil on some sites to make it more suitable for certain habitat creation. For example, a field which has been used for arable purposes (crop production) will have a high nutrient load. This is not suitable for species-rich grassland creation as these habitats require low nutrient loads. The nutrient load of the soil on site will have to be degraded over time in preparation for habitat creation, and this must be factored into the plans for a development proposal.
- 9.7 Cheltenham Borough Council aims for nature recovery to be integrated into development proposals alongside wider environmental protection objectives, including air quality management, invasive species control and the safeguarding of water environments.

Air Quality and Ecological Health (Air Quality Standards Regulations 2010)

- 9.8 Air pollution can have significant adverse effects on habitats and species, particularly through nitrogen deposition and particulate pollution affecting sensitive grasslands, woodlands and aquatic ecosystems. In considering planning applications, the Council will have regard to the most up-to-date national guidance, including Air pollution and development: advice for local authorities (Defra).
- 9.9 Development proposals should: Assess potential air quality impacts on designated sites, priority habitats, and ecological networks.
Demonstrate how impacts have been avoided, minimised or mitigated through design.
Incorporate green infrastructure, tree planting and habitat buffers that contribute to pollutant interception and improved ecosystem resilience; and
Support modal shift and sustainable transport measures that reduce emissions at source.
By embedding air quality considerations into site design and layout, development can actively contribute to healthier ecosystems and communities while strengthening ecological connectivity across the Borough.

Invasive Non-Native Species

- 9.10 Where invasive non-native species are identified within planning applications, their management must comply with relevant legislation. Under Wildlife and Countryside Act 1981 (as amended), species listed on Schedule 9 make it an offence to plant or otherwise cause these species to grow in the wild.
In addition, under the Environmental Protection Act 1990, invasive plant material such as Japanese knotweed is classified as 'controlled waste' and must be handled, transported and disposed of safely at an appropriately licensed facility.

Planning applications must:

- I. Identify the presence of any invasive non-native species through ecological survey where relevant;
- II. Include a biosecurity and method statement for their containment, treatment and disposal;
- III. and demonstrate how spread will be prevented during construction to protect adjoining land, habitats and watercourses.

Effective management of invasive species presents an opportunity to restore native habitats and improve ecological condition as part of wider nature recovery objectives.

Protecting Waterways and Aquatic Ecosystems (Water Framework Directive Regulations 2017)

- 9.11 Cheltenham's watercourses, including the River Chelt, form a key component of the Borough's ecological network and provide important ecosystem services including flood attenuation, water purification and habitat connectivity.

Development should be designed to:

- I. Prevent pollution during construction and operation;
- II. Incorporate sustainable drainage systems (SuDS) that mimic natural hydrology;
- III. Provide buffer zones to watercourses to support riparian habitats;
- IV. Avoid fragmentation of aquatic and riparian corridors; and
- V. Contribute to measurable improvements in water quality where feasible.

Protecting and enhancing waterways is integral to nature recovery. By integrating water-sensitive design, habitat enhancement and pollution prevention into development proposals, applicants can deliver multiple benefits for biodiversity, climate resilience and community wellbeing.

Pre-Application Advice

- 9.12 Seeking pre-application advice can clarify information required, including potential specialist input (if applicable) at an early stage, thereby supporting a formal application and reducing the likelihood of delays later in the planning process.
- 9.13 Cheltenham Borough Council can provide pre-application advice to developers planning projects of any size, subject to the mandatory Biodiversity Gain condition or not. [Pre-application advice fees](#) are dependent on the size and type of development planned.

Consulting Natural England

- 9.14 For developments potentially impacting European Protected Species (EPS) or nationally or internationally designated sites (e.g., SSSIs, Natura 2000 sites), early consultation with Natural England is advisable. In such cases, a Habitats Regulations Assessment (HRA) may also be necessary. Some impacts on EPS can be mitigated through district-level licensing schemes, such as for Great Crested Newts (see Figure 11). Alternatively, a bespoke licence from Natural England may be required.

Consulting The Environment Agency

- 9.15 For developments where a main river runs within or along the site boundary, early consultation with the Environment Agency (EA) is advisable. In addition, if a development is determined to be an Environmental Impact Assessment (EIA) development, the Environment Agency will be a statutory consultee. The EA may be able to provide pre-application advice relating to main rivers and ordinary watercourses as well as ‘water-based’ protected species such as fish, otter and water vole.”

Figure 11. District Level Licensing for Great Crested Newts in Cheltenham

District Level Licensing for Great Crested Newts in Cheltenham

NatureSpace operate a District Level Licensing Scheme in Gloucestershire [About us - NatureSpace Partnership Limited](#). This is an option for developers whose surveys of waterbodies on or near to their sites carried out, which indicate Great Crested Newts (GCN) are present and may be impacted by development. Developers must consult their ecologist as to the best course of action under these circumstances; in order to deliver the best possible outcome for biodiversity and this protected species.

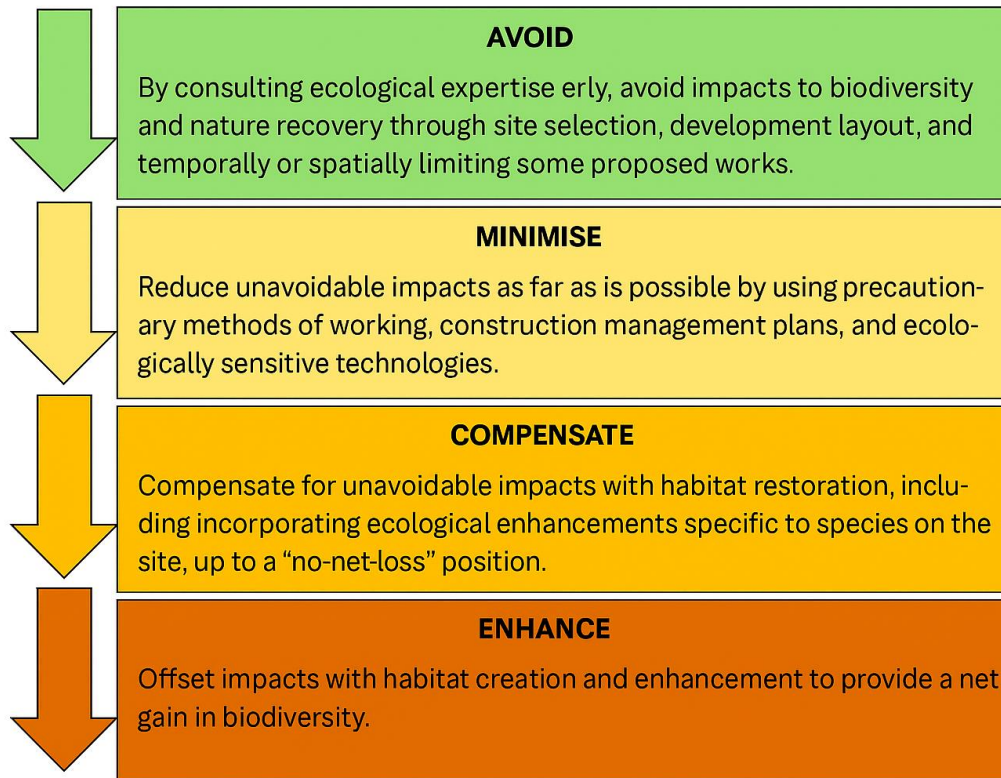
Impact assessment

- 9.16 Where a proposed development may affect designated sites, priority habitats or protected species, the applicant’s suitably qualified ecological consultant must undertake appropriate ecological surveys and impact assessments. These must be completed at an early stage and inform the design process prior to submission of any planning application. Assessments must extend beyond a Preliminary Ecological Appraisal (PEA) and statutory Biodiversity Net Gain (BNG) metric calculations, providing a comprehensive understanding of habitat condition, ecological function and connectivity.
- 9.17 All qualifying development will be required to deliver Biodiversity Net Gain in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by the Environment Act 2021), including submission and approval of a Biodiversity Gain Plan where applicable. However, BNG does not override the requirement to avoid ecological harm in the

first instance. Proposals must clearly demonstrate compliance with the biodiversity mitigation hierarchy (Figure 13), ensuring that impacts are avoided, then minimised, then restored, with compensation and BNG applied only as a last step.

- 9.18 To prevent avoidable habitat degradation (“anti-trashing”), development proposals must:
- I. Avoid unnecessary land stripping, vegetation clearance or soil removal prior to the determination of planning permission;
 - II. Retain existing habitats in situ wherever possible, particularly those contributing to connectivity or functioning as priority habitat;
 - III. Clearly define construction exclusion zones and root protection areas;
 - IV. Protect retained habitats from compaction, storage, contamination or hydrological change during construction; and
 - V. Phase clearance sensitively, supported by method statements, to prevent ecological deterioration before mitigation is secured.
- 9.19 Deliberate or premature clearance of habitats to reduce ecological value prior to assessment or determination will not be supported and may be taken into account in decision-making.
- 9.20 Ecological submissions must set out avoidance measures, construction safeguards, habitat protection plans and long-term management arrangements alongside BNG proposals. Through early ecological input, robust site protection and adherence to the mitigation hierarchy, development can secure measurable biodiversity gain while safeguarding existing ecological assets and supporting wider nature recovery objectives.

Figure 12. Diagram depicting the four key steps to consider when carrying out impact assessments to avoid adverse impact. The hierarchy of these mitigation measures are: avoid, minimise, compensate, enhance.



Scheme design

- 9.21 Development design must be informed by ecological surveys and impact assessments, including BNG calculations. The applicant and ecological consultant must ensure that ecological impacts, along with the mitigation hierarchy and BNG requirements, have informed scheme design. Design work should commence only after completing all relevant ecological surveys. Practical guidance on incorporating ecology into development design, with examples, is provided in Figure 13.

Figure 13. Practical guidance on incorporating ecology into development.

Ecological enhancement in development	Example	Supporting Development Plan policy
<p><u>Pollinator friendly and biodiverse planting</u></p> <p>Urban and suburban planting schemes must incorporate a mix of native shrubs, trees, and plants to provide year-round nectar and pollen for pollinators such as bees, hoverflies, butterflies, and other beneficial insects.</p>	 <p><i>Photo source: South Gloucestershire Biodiversity SPD</i> <i>Photo depicting mixed vegetation including wildflowers and trees essential for pollinators.</i></p>	<p>Policy INF3 ‘Green Infrastructure’ of the Joint Core Strategy</p>
<p><u>Green roofs and living walls</u></p> <p>Urban and suburban development proposals should incorporate green roofs and living walls where possible. The type of green roof or wall should be chosen dependent on the context (e.g. ecological, garden, park) and using guidance from organisations like Livingroofs.org, the leading UK green roof website and the Green Roof Code of Practice grocode2014.pdf</p>	 <p>Green roof with wildflowers and grass</p> <p><i>Photo sources: livingroofs.org</i> <i>Living Wall: carefully curated living wall with mixed vegetation.</i></p>	<p>Policy SD9 ‘Biodiversity and Geodiversity’ of the Joint Core Strategy:</p>

Boundary treatments and boxes for hedgehogs

Incorporate wildlife-friendly fencing with a 13cm x 13cm gap at ground level or a 150mm clearance between the fence and the ground to facilitate movement for hedgehogs and other small mammals. Additionally, consider installing hedgehog boxes in quiet, shaded areas under shrubs or thick vegetation, with the entrance facing away from prevailing cold winds. These features should be indicated on the landscape or ecological plans.



Photo sources: South Gloucestershire Biodiversity SPD

Policy SD9
'Biodiversity and Geodiversity' of the Joint Core Strategy



Bird box provision in open spaces

Where there is access to adequate public and private open space (including gardens), and mature trees capable of supporting them, install appropriate nest boxes for garden birds



Photo source: South Gloucestershire Biodiversity SPD

Policy SD9
'Biodiversity and Geodiversity' of the Joint Core Strategy

<p><u>Bird box provision integral to buildings</u></p> <p>To support species such as swallows, house martins, sparrows, swifts, starlings, barn owls, and kestrels, integrate nesting and roosting features into building designs.</p> <p>When installing external boxes, ensure they are positioned at least 5 metres above ground, facing north or east to avoid direct sunlight. Maintain a clear flight path and protect from predators by avoiding proximity to trees or climbing plants. For swift boxes, placement under eaves or soffits is ideal to provide shade and shelter.</p> <p>Utilise materials like woodcrete or woodstone for durability and insulation. Where direct integration into the building is not feasible, external boxes can be mounted securely, adhering to manufacturer guidelines.</p>	 <p><i>Photo source: South Gloucestershire Biodiversity SPD</i></p>	<p>Policy SD9 ‘Biodiversity and Geodiversity’ of the Joint Core Strategy</p>
<p>Incorporate Bee Bricks and other invertebrate features built into developments</p>	 <p><i>Photo source: South Gloucestershire Biodiversity SPD</i></p>	<p>Policy SD9 ‘Biodiversity and Geodiversity’ of the Joint Core Strategy</p>

Sustainable Drainage Systems (SuDS)

Chapter 6 of the CIRIA SuDS Manual 2015 'Designing for Biodiversity' explains the design criteria that must be followed to deliver the objective of designing SuDS with biodiversity benefits.

Chapter 8 of the Gloucestershire SuDS Design & Maintenance Guide 2015 'SuDS, Biodiversity and Amenity' also provides guidance and good practice on how to protect and enhance biodiversity with SuDS installations.

DEFRA recently released updated the national standards for SUDS – available here: <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems>

The standards/requirements for biodiversity can be found here: <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds#standard-6-biodiversity>

Some local examples of SuDs: <https://www.gloucestershirewildlifetrust.co.uk/what-we-do/current-projects/gloucester-and-cheltenham-waterscapes-project>

https://www.susdrain.org/case-studies/pdfs/suds_awards/007_18_03_29_susdrain_suds_awards_priors_farm_estate_suds_retr_ofitting_project_cheltenham.pdf



Photo source: Cheltenham Borough Council





Photo Source: Cheltenham Borough Council



Photo Source: Cheltenham Borough Council

Policy INF2 'Flood Risk Management' of the Joint Core Strategy

See also: Chapter 10 'Biodiversity and Geodiversity' of the Cheltenham Plan

<p><u>Specific measures for tree provision</u></p> <p>To come from the CBC Tree Strategy when finalised – see section 8</p>		<p>Policy INF3 ‘Green Infrastructure’ of the Joint Core Strategy</p>
<p><u>Hedgerows</u></p> <p>Create a successful hedgerow by starting with careful planning and site preparation, then planting a mix of native species, ensuring proper spacing and protection. Maintaining the hedgerow through appropriate management practices is crucial for its long-term health and biodiversity. Guidance on planting new hedgerows can be found here BN11: Planting new hedges - GOV.UK</p>	 <p><i>Photo source: Suffolk Wildlife Trust</i></p>	<p>Policy INF3 ‘Green Infrastructure’ of the Joint Core Strategy</p> <p>Policy SD9 ‘Biodiversity and Geodiversity’ of the Joint Core Strategy</p>
<p><u>Grassland</u></p> <p>Creating species-rich grassland involves careful preparation, appropriate species selection, and ongoing management to encourage a diverse plant community. Key steps include choosing suitable sites, preparing the soil, selecting appropriate seed mixes or green hay, and implementing a targeted management plan focused on cutting and grazing. Guidance on creating and restoring species rich grassland can be found here: Create and restore species-rich grassland – Farming</p>	 <p><i>Photo source: Cheltenham Borough Council website</i></p>	<p>Policy INF3 ‘Green Infrastructure’ of the Joint Core Strategy</p>
<p><u>Multilayered planting structures:</u> Developers and land managers should incorporate multi-layered planting structures combining trees, shrubs and ground layer vegetation as a means of maximising ecosystem resilience, and amenity values within urban sites.</p>		<p>Policy SD9 ‘Biodiversity and Geodiversity’ and INF3 Green Infrastructure</p>

The Building with Nature Green Infrastructure Standards

- 9.22 Development design must be informed by ecological surveys and impact assessments, including BNG calculations. The applicant and ecological consultant must ensure that ecological impacts, along with the mitigation hierarchy and BNG requirements, have informed scheme design. Design work should commence only after completing all relevant ecological surveys. Practical guidance on incorporating ecology into development design, with examples, is provided in Figure 13.
- 9.23 Cheltenham Borough Council strongly encourages developers to follow the Building with Nature Standards (and demonstrate how they have done so). Building with Nature awards are available for development projects which demonstrate exceptional use of the standards (assessed independently of Cheltenham Borough Council) and achieving this recognition promotes long-term value of a development by improving the resilience of the built environment to climate change, and ensuring healthier, more attractive spaces for people and wildlife alike. For more information visit the [Building with Nature](#) website.
- 9.24 Blue and green infrastructure (BGI) forms the foundation of a resilient and healthy environment in the Cheltenham Borough. It includes parks, trees, hedgerows, private gardens, green roofs and walls, sustainable drainage systems (SuDS), ponds, wetlands and watercourses such as the River Chelt.
- 9.25 When planned positively, BGI delivers multiple benefits:
- 9.26 Integrating blue and green infrastructure into development proposals must be seen as an opportunity to enhance natural capital and ecosystem services, rather than as a constraint.
- I. Strengthens ecological connectivity and supports the Nature Recovery Network;
 - II. Improves water quality and reduces surface water flood risk;
 - III. Enhances climate resilience through shading, cooling and carbon storage;
 - IV. Improves air quality and intercepts pollutants;
 - V. Supports health and wellbeing through access to nature; and
 - VI. Contributes to local character and place-making.
- 9.27 Integrating blue and green infrastructure into development proposals must be seen as an opportunity to enhance natural capital and ecosystem services, rather than as a constraint.

Strategic Role in Cheltenham

- 9.28 Within Cheltenham, green corridors and watercourses play a critical role in linking habitats between the urban area and surrounding landscapes. Enhancing green streets, riparian buffers, urban tree canopy and SuDS features helps reinforce these connections, particularly where development occurs within existing built-up areas. Development proposals should

demonstrate how BGI has been embedded into site layout from the outset, contributing to biodiversity net gain, ecological connectivity and water management objectives.

Recommendations for Small-Scale Development

9.29 Nature recovery and climate resilience are relevant to all development, regardless of scale. Even minor proposals, such as single dwellings, householder extensions, conversions or infill plots- can make meaningful contributions.

9.30 **Small-scale developments are encouraged to incorporate:**

- i. Native tree planting appropriate to site size;
- ii. Urban greening
- iii. Species-rich hedgerows instead of close-board fencing;
- iv. Climbing plants and green walls;
- v. Replacement of impermeable surfacing with permeable alternatives.

9.31 **Sustainable Drainage (Blue Infrastructure):**

- i. Rain gardens and small bioretention areas;
- ii. Water butts and rainwater harvesting;
- iii. Permeable paving;
- iv. Swales or shallow planted channels where space allows.
- v. SuDS features should be designed to provide both drainage and biodiversity benefits.

9.32 **Habitat Features:**

- i. Integrated bat and bird boxes within new buildings;
- ii. Log piles or invertebrate habitats in garden spaces;
- iii. Pollinator-friendly planting schemes;
- iv. Retention of mature trees and boundary vegetation wherever possible.

9.33 **Water Protection:**

- I. Where development is located near a watercourse, proposals should provide undeveloped buffer zones, avoid culverting, and prevent surface water or sediment runoff from entering the water environment.
- II. Through thoughtful integration of blue and green infrastructure, even small developments can cumulatively deliver significant benefits for Cheltenham's environment, supporting nature recovery while enhancing the quality and resilience of the built environment.

9.34 **Design Features:**

For all scales of development, blue and green infrastructure should:

- I. Be multifunctional (delivering biodiversity, drainage, climate and amenity benefits);
- II. Be designed for long-term management and maintenance;
- III. Use locally appropriate native species;
- IV. Avoid fragmentation of existing green corridors; and
- V. Contribute to measurable biodiversity improvements where applicable.

Noise, vibration, light and air pollution impacts on wildlife

- 9.35 Scheme design must include measures to prevent non-physical disturbances to wildlife during and post-construction. These disturbances can include noise, vibration, light and air pollution.
- 9.36 Noise and vibration pollution generated by construction machinery and traffic can impact wildlife by disrupting communication, altering foraging, burrowing and nesting behaviours, and causing habitat avoidance. These impacts can cause long-term stress, leading to reduced reproductive success.
- 9.37 Light pollution from construction activities can impact wildlife by causing disorientation, altered behavioural patterns and disrupting circadian rhythms. These impacts can lead to increased predation risk and reduced foraging success. Development proposals must demonstrate how they have been informed by current best practice guidance, including the Institute of Lighting Professionals (ILP) *Guidance Note for the Reduction of Obtrusive Light* and *Bats and Artificial Lighting in the UK*. Schemes should be designed to avoid, minimise and mitigate impacts from artificial lighting on bats and other nocturnal species through sensitive layout, appropriate luminaire selection, directional lighting, low lux levels, warm colour temperatures and the use of timers and motion controls. Development must ensure the protection of nocturnal wildlife in accordance with the Conservation of Habitats and Species Regulations 2017, the Wildlife and Countryside Act 1981, Circular 06/2005, paragraphs 187, 192 and 193 of the National Planning Policy Framework and to enable the Council to discharge its duty under Section 40 of the Natural Environment and Rural Communities Act 2006 as amended by the Environment Act 2021. Proposals should retain and buffer key commuting and foraging corridors, including hedgerows, woodland edges and watercourses, and demonstrate through appropriate ecological assessment that dark corridors will be maintained and that favourable conservation status of protected species will be safeguarded.
- 9.38 Air pollution generated by construction activities (for example from dust and vehicle/machinery emissions) can impact wildlife by causing respiratory problems from

direct inhalation, habitat degradation from pollutant build-up in soils and water bodies, and food-chain alterations from the air pollution particulates settling on soil and plants before these enter the food chain.

- 9.39 Non-physical disturbances like these must be reduced as far as is practicable. Measure to address this will be secured by the LPA in suitably worded conditions for the provision of Construction Environment Management Plans (CEMPs).

10. Legal agreements

- 10.1 If planning permission is granted for a proposal that is subject to the mandatory Biodiversity Gain condition, this could be subject to a legal agreement such as a Section 106, which secures the details of the BGP and HMMP (if offsite habitat creation is proposed) plus the fees required for monitoring of significant gains

Legal agreement options

- 10.2 For a developer who is meeting the biodiversity net gain condition via either on-site significant gains or off-site through habitat creation within the LPA boundary a S106 will be required to both secure BNG delivery and enable the developer to register the site on the National BNG sites register where required (off site habitat creation). The S106 would be agreed between the landowner of the site and the LPA.
- 10.3 For a developer who is creating biodiversity gain off-site, on a habitat bank outside the LPA boundary, a Conservation Covenant will be required to both secure BNG delivery and enable the developer to register the site on the National BNG sites register. The Conservation Covenant would be agreed between the landowner of the habitat bank and a [Responsible Body](#), namely Natural England. Responsible bodies have been designated as such by central government. Their role is to legally secure land and its associated conservation objectives⁷. Cheltenham Borough Council will require proof of purchase for habitat units used to meet the biodiversity gain condition and the BGP stage.

⁷ [Responsible Bodies and Conservation Covenants | The Wildlife Trusts](#)

11. Long-term management, monitoring, and enforcement

- 11.1 Cheltenham Borough Council will require most developments in Cheltenham to be managed long-term to secure the ecological and environmental benefits of the green/blue infrastructure provision, soft landscaping, and habitat creation and/or enhancement that forms part of the development long-term.

What is the difference between management and monitoring?

- 11.2 **Management** is the execution of the activities outlined in a management plan to control the progression of the targets in the management plan. These management plans will either be a Landscape Ecological Management Plan (LEMP) (small sites with non significant gains) or a Habitat Management and Monitoring Plan (HMMP) (large sites or significant gains) for BNG applications.
- 11.3 **Monitoring** is observing and collecting information about the management to track progress and identify whether the targets of the management are being met or not. This may result in changes in management.
- 11.4 It is important to note that outside of BNG, if an EPS licence (see chapter 9) is required for a development to be lawful, monitoring will form a key component and condition of the licence and will require the employment of an ecological consultant to take this forward.
- 11.5 **Monitoring reports** are required as part of long-term management under a HMMP. These monitoring reports must be submitted to the LPA at agreed frequencies. These frequencies are agreed in the contents of the approved HMMP when this is submitted to the LPA and should be proportionate to the scale of the development.
- 11.6 Management and monitoring feed-back into each other over time. The information gathered during monitoring can inform ongoing management, and the results of the management activities provide the information gathered during monitoring.
- 11.7 The LPA requires a fee to be paid to secure the monitoring of all significant gain sites.

What is the difference between a LEMP and a HMMP?

- 11.8 A **LEMP** is a long-term management plan which may be secured for small scale non-significant gain sites.

- 11.9 A **HMMP** is a 30-year management plan which will be secured for large and/or significant developments which are subject to the mandatory biodiversity gain condition. It must contain explicit management prescriptions for all the habitats created, retained or enhanced which contribute to the BNG calculation for a development. Natural England has developed a standard template for HMMPs which is available online, here: [Habitat Management and Monitoring Plan Template - JP058](#)
- 11.10 LEMPs and HMMPs are usually conditioned, or form part of a legal agreement (especially where a fee is required for the council to review monitoring reports) but these can be provided up-front within a planning application's submission documents. Standard condition wording is used for HMMPs, and the wording is varied for LEMPs, proportionate to the development.

Roles, responsibilities, and enforcement

- 11.11 It is the role of the developer/landowner to make sure the management plan is delivered by a suitable organisation and that this organisation complies with the details of the management plan, including submitting monitoring reports according to the agreed reporting schedule.
- 11.12 Monitoring the delivery of a management plan sits with the party who has conditioned a management plan on a development to secure the delivery of its contents, e.g. an LPA for planning obligations and conditions.
- 11.13 Non-compliance with a management plan which has been conditioned or secured with a legal agreement between the LPA and the developer/landowner will result in enforcement or other legal action. Enforcement action stemming from breach of a planning condition cannot be appealed. Action taken following breach of a S106 can be appealed. However, if an appeal is lost, the appellant will be subject to fines. Enforcement action will be taken where breaches of conditions and legal agreements are within the public interest and expedient.
- 11.14 Proactive monitoring will take place from Cheltenham Borough Council's ecology team. Breaches of conditions or legal agreements will be reported to enforcement by those who identify the breach (this may be members of the public or Officers working within CBC), followed by the CBC enforcement team liaising with the planning team and establishing enforcement action in a collaborative manner.
- 11.15 Cheltenham Borough Council have established a monitoring IT programme which alerts the LPA at each monitoring interval for planning applications which have been subject to

mandatory BNG. This ensures that the LPA are aware of monitoring report due dates and can conduct site visits where appropriate.

12. Nature Recovery Checklist

12.1 This chapter contains a checklist for developers to use to check for the inclusion of best practice for nature recovery in their development proposal. This is intended to be applied in addition to Cheltenham Borough Council's [validation list requirements](#) and is a more qualitative assessment of whether their proposal meets expectations and requirements for nature recovery as set out in this SPD.

Figure 14. Nature Recovery checklist.

Check	Policy / NPPF /validation hook	When is this required?	✓ / x
Have you engaged ecological expertise as early in the scoping/design of your development proposal as possible?		Scoping/site selection and pre-design if possible	
Have you sought pre-application advice from the development management team at CBC to help guide your development proposal with regard to biodiversity and nature recovery?		Pre-application	
Have you had ecological and arboricultural (where relevant) surveys carried out for your proposed development by a suitably qualified professional?	CBC planning application validation requirement	Pre-application, validation and determination	
Have you had an ecological report completed with the findings of completed surveys contained within it?	CBC planning application validation requirement	Pre-validation and determination	
Have you had a BNG assessment (a report and a completed Statutory Biodiversity Metric) completed for your proposed development by a suitably qualified professional?	NPPF / Environment Act 2021	Pre-validation	
Have you identified all possibilities to achieve 10% BNG, calculated using the Statutory Biodiversity Metric, on your proposed development site, demonstrating how the mitigation hierarchy has been applied?	NPPF / Environment Act 2021	Pre-validation	

Have you read the relevant biodiversity policies in the Development Plan and applied these to your proposed development?		Pre-determination	
Have you used the Gloucestershire Local Nature Recovery Strategy (LNRS) to inform your on-site and/or off-site biodiversity gain provision for your proposed development?		Pre-determination	
Where relevant, have you consulted Natural England regarding potentially impacting EPS or nationally/internationally designated sites?	NPPF	Pre-determination	
Where relevant, have you consulted NatureSpace with regards to district level licensing for Great Crested Newts (GCN)?		Pre-determination	
Have you incorporated pollinator-friendly and biodiverse planting in the landscaping scheme for your proposed development?	Policy INF3 'Green Infrastructure' of the Joint Core Strategy	Pre-determination but can be conditioned	
Have you incorporated ecological enhancements such as boundary treatments and boxes for hedgehogs, species-specific bird boxes in open spaces or integrated into buildings, and bee bricks and other invertebrate features on buildings in the landscaping scheme for your proposed development?	Policy SD9 'Biodiversity and Geodiversity' of the Joint Core Strategy	Pre-determination but can be conditioned	
Have you incorporated biodiverse Sustainable Drainage Systems (SuDS) solutions in your proposed development?	Policy INF2 'Flood Risk Management' of the Joint Core Strategy See also: Chapter 10 'Biodiversity and Geodiversity' of the	Pre-determination	

	Cheltenham Plan		
Have you followed the guidance in the CBC Tree Strategy with regards to tree protection and provision in your proposed development?	Policy INF3 'Green Infrastructure' of the Joint Core Strategy CBC Tree Strategy	Pre-determination but can be conditioned	
Has your design for hedgerows and grassland included locally sourced biodiverse and native species where possible?	Policy INF3 'Green Infrastructure' of the Joint Core Strategy Policy SD9 'Biodiversity and Geodiversity' of the Joint Core Strategy	Pre-determination but can be conditioned	
Have you engaged with local contractors to implement, monitor and report on a long-term management plan (LEMP or HMMP) for your proposed development post-completion?		Pre-commencement	