

Nature Recovery Supplementary Planning Document: Consultation Statement

1. Introduction

1.1. This statement is the 'Consultation Statement' for the Nature Recovery Supplementary Planning Document (SPD). It has been prepared as required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It sets out the consultation undertaken and summarises the comments received during the consultation period, including details of how the main issues raised have been dealt with in working towards a final SPD for adoption.

2. Town and Country Planning Regulations

2.1. The SPD is produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The relevant regulations relating to the consultation process are explained below.

- i. Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated into the SPD.
- ii. Regulation 12(b) requires the Council to publish the documents (including a 'consultation statement') for a minimum 4 week consultation, specify the date when responses should be received, and identify the address to which responses should be sent.
- iii. This statement is the 'Consultation Statement' for the SPD as required by Regulation 12(a). The document also sets out information about the consultation as required by Regulation 12(b). Following the consultation period, as the SPD progresses towards adoption, the 'Consultation Statement' will be expanded to recognise involvement by outside bodies and public participation during this consultation period.
- iv. Regulation 13: Regulation 13 stipulates that any person may make representations about the SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12. This consultation statement sets out this requirement.
- v. Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be made available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps:
 1. Make the document available at the principal office and other places within the area that the Council considers appropriate.
 2. Publish the document on the Council's website.

3. The Statement of Community Involvement (SCI)

3.1. This consultation statement has been prepared within the context of the Cheltenham SCI and reflects the 2012 Regulations, set out above. The relevant SCI set out how the council will consult and involve people in the preparation of Local Plans, including Supplementary Planning

Documents. Consultation on the draft SPD was carried out in line with the principles of the adopted SCI.

4. Draft SPD Consultation

4.1. Consultation on the draft SPD was carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The SPD and its accompanying consultation was made available for inspection by the public for a four week period from Friday 7 November 2025 until midnight Sunday 7 December 2025. A copy of the SPD and this consultation statement was made available to view at:

https://www.cheltenham.gov.uk/info/46/planning_policy/1926/nature_recovery_supplementary_planning_document

4.2. All interested parties were invited to make comments, these included:

- i. Specific consultation bodies that the Council consider may have an interest in the Local Plan;
- ii. General consultation bodies that the Council consider appropriate; and
- iii. Such residents or other persons carrying on business in the District which the Council consider appropriate to invite representations from.

4.3. A total of 19 responses were received from a range of stakeholders including statutory bodies, local authorities, parish councils, community organisations, planning agents, elected members and local residents. The breakdown of responses is as follows

- i. 3 Statutory Bodies: Gloucestershire Wildlife Trust, the Environment Agency, and Historic England.
- ii. 3 Local Authorities / Public-Sector Partners: Gloucestershire County Council, Cheltenham Borough Council internal officers, and Charlton Kings Parish Council.
- iii. 3 'Friends' Groups: Friends of Charlton Kings, Friends of Glenfall Way, and Friends of Oakley Pastures (joint response).
- iv. 2 Community Groups: Cheltenham Civic Society and Charlton Kings Parish Council (separate from GCC thematic comments).
- v. 3 Elected Members: Cllr Chris Day, Cllr Jan Foster and Cllr Jackie Chelin.
- vi. 5 Planning Agents and Consultants: including SF Planning, independent consultants, the Gloucestershire Local Nature Partnership, and others providing professional representations.
- vii. 2 Individual Residents: raising issues relating to biodiversity, trees, soil health and local environmental concerns

4.4. The following *Table 1: Summary of responses from public consultation* shows the main issues raised by the respondents and how those issues have been addressed in the final SPD:

Table 1: Summary of responses from public consultation

Response representative	Summary of key issue	Officer response	Summary of amendments made to SPD
<p>Josh Gibbs - Gloucestershire Wildlife Trust (GWT)</p>	<p>Borough wide ecological connectivity could be more strongly articulated to produce a document that includes maps of key ecological pinch points and opportunities in Cheltenham e.g.: the urban corridor between Leckhampton Hill and the River Chelt. Could be helpful to developers to contribute beyond individual site boundaries.</p>	<p>The text has been updated to reflect this comment. The guidance now makes clear that development proposals will be expected to respond to LNRS mapping and contribute to strategic connectivity objectives beyond individual site boundaries. This ensures that ecological enhancement is delivered at both the site and landscape scale, in alignment with the county-wide Nature Recovery Network.</p>	<p>See section 7.2 updates The document has been updated to clarify how borough-wide ecological connectivity will be addressed strategically through the Gloucestershire Local Nature Recovery Strategy (LNRS).</p>
	<p>Stronger reference to green/blue infrastructure as a functional network, not just design features. GWT recommends presenting Green Infrastructure (GI) features (eg: hedgerows) as components of a functional ecological network instead of discrete enhancements.</p>	<p>A section has been added to incorporate blue and green infrastructure as a functional network.</p>	<p>See Borough Wide Ecological Connectivity 7.6. Also 'The Building with Nature Green Infrastructure Standards on pages 35,36</p>
	<p>GWT suggests adding informal small-scale habitats (eg: private gardens, green lanes, incidental grassland... etc) to the list of ecological assets; ie, not solely focusing on statutory habitats, Biodiversity Net Gain (BNG) habitats and formal green spaces.</p>	<p>Added a section on small scale habitats.</p>	<p>See changes in sections 4,5 and 6 (BNG)</p>
	<p>GWT suggest including a recognition of the relationship between heritage and ecological</p>	<p>An acknowledgement of the relationship between heritage and ecological assets with particular</p>	<p>Amended. See paragraph 8.4 (vii)</p>

Josh Gibbs - Gloucestershire Wildlife Trust (GWT)	assets particularly around ancient/veteran trees, historic water bodies and parkland habitats.	reference to ancient and veteran trees has been added	
	GWT recommends mentioning Cheltenham Borough's six local wildlife sites, acknowledging that the sites exist within the borough, are important biodiversity features and that their impact should be considered in development proposals within the mitigation hierarchy.	There are two local wildlife sites, Pilley Bridge LNR and Griffiths Avenue LNR	No change
	Within the summary of the Cheltenham tree strategy, the GWT recommends addressing the continuity of veterans and ancient 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. Providing explicit routes for succession would align the SPD with best practice on ancient/veteran tree management and reinforce trees as long-term natural capital.	We have now addressed the importance of the continuity of ancient and veteran trees in the tree strategy to create future veterans. Vets and ancients are not suitable for most urban spaces because they fall apart. In the built environment, trees don't reach this age class because of the danger that presents to people and structures. We manage woodland areas – Benhall Woods, Leckhampton Hill, and to a certain extent the Honeybourne Line, in a light-touch management style which might be more likely to create vets and ancient trees. The woodland environment provides collective protection for individual trees from the wind which might reduce the likelihood of failure of older trees. There is also usually more space for trees to get big and old and fall apart without damaging structures or hurting people.	Amended. See paragraph point 8.3

	GWT suggests referring to the Gloucestershire Nature + Climate Fund (GNCF) to direct developers to the GNCF instead of seeking offsetting outside of Gloucestershire and thus retain off site BNG funding and ensure habitat creation aligns with the LNRS.	Local habitat banks can be found through Gloucestershire wildlife trust, the Gloucestershire nature and climate fund and other habitat bank providers. This is a great point which we will reflect on the CBC website	No change
	GWT strongly recommends signposting Gloucester City Council's "Biodiversity Net Gain: Small Developments Guide (March 2024), to provide some practical guidance on how BNG can be achieved on minor schemes.	This document has now been superseded by the LNRS so no change needed.	No change
	Double check and correct: <i>'If the habitat is within the LNRS, then it will have "high" strategic significance because it is of particular importance for Gloucestershire. If it is not within the LNRS then it will have "low" strategic significance'</i> . GWT's explains that: "Strategic significance within the statutory biodiversity metric applies only to certain habitat measures and is not a blanket rule for all LNRS priorities".	The wording has been changed to reflect that strategic significance within the statutory biodiversity metric applies only to certain habitat measures and is not a blanket rule for all LNRS priorities	Amended. See paragraph 7.3
The Environmental Agency (EA)	EA, recommends adding a paragraph on 'Consulting the Environmental Agency' at section 9.9 'Consulting Natural England'.	A paragraph on consulting Natural England has been added to page 27 paragraph 9.14	Amended. See paragraph 9:14
	EA recommends making reference to water-related legislation such as the Water Framework Directive or the in the section on legislation (3.2).	A reference to the Water Framework Directive legislation has been made on section 3.2	Amended under Legislation section 3.2. Also referenced in 9.11

	EA encourage to emphasise the importance of the water environments (ponds, rivers, streams, wetlands).	We have added a section on water environment	Amended in section: 9.7 and waterway protection page 35 point 4.
	EA encourage to further highlight the benefits from integrating blue and green infrastructure even at a small scale.	Noted. This comment has been considered and a section reflecting this has been added	Text added in section: Under the Building with Nature Standards pages 33-35
Councillor Chris Day	Proposes a clarification detailing the extent of the requirements of the SPD as grounds for refusal of a planning application.	Each section of the SPD will be updated to be linked to a policy. Important to note that an SPD acts as guidance.	Changes made at each heading throughout
	What requirements of the SPD should be applied to Outline applications, and to what extent its requirements should be deferred to the Reserved Matters stage.	The SPD is supplementary guidance and cannot overrule the planning regulations and the NPPF. All applications are required to meet these.	No change
	Suggests that the SPD should clarify to what extent applicants can be compelled to commit to BNG offsetting within Cheltenham's boundary, as resident's expectations would be that BNG offset takes place within Cheltenham's boundaries, so that the impact on nature and biodiversity within Cheltenham is at worst, neutral.	The whole BNG section has been changed for clarity.	Change has been made to BNG section 5 page 15.
	Consideration of the implications of shared ownership between Gloucester County Council (GCC) and Cheltenham Borough Council (CBC) trees. A section outlining the current state of responsibilities and how that feeds into the tree strategy.	CBC manages trees in leisure spaces (parks, open areas), cemeteries, CBC car parks, housing forecourts and in an ad-hoc way in other housing sites. Gloucestershire Highways manage trees on the highway (the extent of the adopted highway is shown on Earthlight). GCC have a Tree strategy and have been directly engaged on the Cheltenham tree strategy. Operationally officers work together and	No change

Councillor Chris Day		further to the approval of the Cheltenham Tree Strategy in February 2026 officers will be working with GCC to align trees management and planting with the strategy.	
	Further guidance is advised for (9.6) the time period considered acceptable for soil nutrient reduction to be achieved to make soil suitable for habitat creation.	Outside of the scope of this SPD Where soil sampling is required for planning, results will be reported to GCER (Gloucestershire centre environmental records) but reducing nutrient load is outside the scope of this SPD.	No change
	Suggests explanation on (9.10), to detail requirements of assessment at Outline Planning Permission stage and Reserved Matters.	Outside the scope of the SPD. CBC development management team work in line with most up to date guidance from central government.	No change
	Due to the current and future approach described by senior officers for planning enforcement to be reactive reports from the public, councillors etc (not to be proactive) a correction will need to be made to the following in order to accurately reflect the latest Planning Enforcement Policy: (11.14) <i>“Proactive monitoring will take place from Cheltenham Borough Council’s enforcement team”.</i>	We have updated the BNG section to include proactive monitoring. Development management enforcement outside of BNG is not in the scope of this SPD.	Change made in Chapter 11.
Cheltenham Civic Society (CCS)	CCS suggest a Cheltenham specific nature recovery plan.	This nature recovery SPD is specific to Cheltenham.	No change
	CCS recommends that the following policies may be used towards a Cheltenham Nature recovery plan:		

<p>Cheltenham Civic Society (CCS)</p>	<p>1.The creation of a town wide network of green infrastructure including watercourses (notably the River Chelt) and flood plains, disused railway lines and other linear features within and outside the town, all expressed geographically on a map.</p> <p>2.The establishment of this network could be funded through BNG payments. Enhancing connectivity for wildlife. Through the creation of this network, new local nature reserves would form “nodes”.</p> <p>3.Prevention of surface water flooding (porous surfaces, water gardens, water harvesting etc) designed to coordinate public sector actors, statutory undertakers and local groups in creating local plans.</p> <p>4.Land management standards for parks and other public green spaces, such as road verges, and school and hospital grounds, to support nature recovery</p> <p>5.A scheme to transform nature-impooverished areas into greener ones – for example, a bold plan to plant dozens of trees in all the CBC car parks or to enhance grassed areas of parks which lack any value for nature.</p> <p>6.Policies to encourage nature-friendly management of private land, especially of gardens.</p>	<p>1-A water section has been added. Although, important to note that this SPD acts as guidance and not policy. However, we have provided links to relevant national and local policies throughout this SPD.</p> <p>2- BNG payments do not come to the LPA, therefore we cannot use these to create nature reserves.</p> <p>3- Some additional guidance has been incorporated in regard to SuDs.</p> <p>4- Cheltenham Borough Council has a strong green spaces team and very high-quality habitat management. Any increase in management would require additional funding.</p> <p>5- Noted but requires further funding. The Cheltenham Tree Strategy, approved by Cabinet February 2026 is a helpful lever to support wider planting. It should be noted that tree planting needs to be balanced across all competing needs and aligned with appropriate maintenance for which ongoing funding is required.</p> <p>6- Outside of the scope of this SPD.</p>	<p>1-A water section has been added in Para 9.11 and under the Building with Nature Green Infrastructure standards.</p> <p>2- No Change</p> <p>3- See changes made in 9.11, Figure 14, Building with Green Nature Standards section.</p> <p>4- No change</p> <p>5- No change</p> <p>6- No change</p>
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	7.Support for community engagement designed to help nature recovery	7-The parks and green space work closely with the community, please see details in the Biodiversity Duty report adopted by Cabinet March 2026.	7-No change
	The SPD is considered too technical and long in places eg: in BNG description, or offsetting. The CCS suggests making the draft more reader-friendly and accessible to a wide range of audiences by shortening text, adding diagrams, more images and highlighting text. For this, the Climate Change SPD could be used as a model.	The SPD is being produced for a range of different stakeholders. Therefore, some of the content will be technical in nature. However, we have updated the entire BNG section to make it more user friendly.	See changes in sections 4,5 and 6 (BNG)
	A simple leaflet done in conjunction with the Wildlife Trust could be implemented to support the policies in the draft SPD aimed at assisting householders, covering possible ways in which they can restore nature eg: installing water butts to catch run-off from roofs... etc	This is outside the scope of this SPD as this comment suggests creating a separate document. However, the suggestion is noted.	No change
	To bring various stakeholders together, a council-led initiative similar to the Cheltenham Heritage Project, could be done as a Cheltenham Nature Restoration Project.	Senior planning ecologist works closely with the nature recovery partnership, however, a council led initiative would require further resourcing. Outside the scope of this SPD	No change
	Para. No 1.4: Here alone the text addresses the reader as “you”. Either it adopts this friendly style throughout – or not at all.	This has been noted and changed accordingly.	Amended in Para No 1.4

Cheltenham Civic Society (CCS)	Para. No 1.5: What happened to the Little Herbert LNR? As part of the same former railway line as Pilley Bridge LNR, it is an obvious candidate for LNR status if that is in doubt.	Status not changed at time of this SPD creation	No change
	Para No 1.5: We understand that the Leckhampton Hill SSSI is to be designated as a National Nature Reserve in 2026.	Leckhampton hill is now a national nature reserve	This is now reflected in para no 1.5.
	Para No 1.6: The Severn lies to the west of Cheltenham.	This mistake has been noted and changed.	Amended in Para No 1.6
	Para No 1.7: The text here implies that the Jurassic limestone (oolites) are the underlying rocks to the town, which is not the case. Underlying Cheltenham are older rocks than those forming the Cotswolds; laid down about 200 million years ago, these rocks of the Lias group are siltstone, sandstone, limestone and mudstones. Except in the east of borough, it is these, not the Jurassic limestone, that give rise to the soils we have here.	This text has been incorporated to reflect this information	Amended in Para no 1.7
	Para No 1.13 The % figures used here are confusing. Do they mean the distribution of the species has contracted (i.e., the species is found in smaller areas) or has the species itself declined in terms of numbers? And what do the % figures mean in the three images?	Some of the statistics mentioned here are related to distribution and others to abundance. For example, the abundance of terrestrial and freshwater species has fallen by 19%. The distribution of invertebrates has decreased by 13%. This information is taken from the State of Nature Report 2023, so for further details it is available here: https://stateofnature.org.uk/ The % referred to in Figure 4 relate to the text directly above in para 1.14. This will now be made clear in figure 4.	Amended in Para 1.13

Cheltenham Civic Society (CCS)	Para No 2.4: You can't buy habitat with products e.g. bat boxes, swift bricks, bee hotels etc. The habitat is all the surrounding vegetation (landscape), which provides food (insects etc.) for wildlife.	These features are additional to BNG and cannot be included as an enhancement to habitats. They are an enhancement to development for roosting features required in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (Chapter 15)	Section 6 updated page 15 BNG section rewritten
	Fig 1: Tree Protection Orders should be Tree Preservation Orders	The wording from Tree Protection to Tree Preservation orders has been done.	Amended in Figure 1
	Ch.4: Will this need to be changed by the measures likely to be introduced in the emerging Planning and Infrastructure Bill?	Yes, but we cannot comment on that yet. This is a future action when the bill comes to fruition. We will need to consider these changes in any updates of SPDs or new documents once the bill is in place (maybe late 2026 – early 2027)	No change
	Para No 4.5: This table is confusing as it combines two levels in a hierarchy of information	This comment is not clear as the paragraph referenced does not match the description of the figure and can therefore not be changed.	No change
	Para No 4.7: This paragraph is confusing (though that may be the fault of the legislation)	Noted. No change made	No change
	Para No 5.3: Who is going to check management for 30 years and administer the legal agreement? You do not check existing landscape conditions for 7 years. Same applies to 11.14.	Senior Planning Ecologist will be responsible for this. Any noncompliance sites will be reported to enforcement. We have an IT programme that notifies us and records when monitoring visits and reports are due.	Section 10 updated
	Para No 6.2: The inclusion of new abbreviations (EclA and PEA) suggests this SPD will need a glossary. Also how does a habitat bank (land bank), help residents and biodiversity of Cheltenham?	For a glossary reference please see the SLP glossary Habitat banks will only be considered in the hierarchy. Local habitats 1 st .	No change

Cheltenham Civic Society (CCS)	<p>Para No 7.5: Somewhere it needs saying that nature recovery will be more the result of sympathetic land management than protective planning policy. While the latter is essential, it is not sufficient. Nature will only be protected and restored if land managers help it do so, and most of their actions are outside the scope of the planning system.</p>	<p>Out of scope of this document and sadly the authority. We can only work with planning and our own land holding.</p>	<p>No change</p>
	<p>Para No 8.2: Tree Strategies should have target percentages for planting and calculate lost trees as well.</p>	<p>The approach for this SPD is to target tree retention and planting based on more subtle data points as canopy would be enhanced / optimised as a result. For example, we can look at the percentage of large-growing species per ward and look to increase that category of trees in the next planting season. Or we can look at longer-living species per ward, or the age class or condition, or the very simple criteria of how many new trees are in a ward. It's an ethos of optimisation and planting for the situation rather than the heavy-handed approach of increasing mass per borough</p>	<p>No change</p>
	<p>Para No 9.1: You could even add that conserving biodiversity adds to property values, since many people seek a natural setting for their homes.</p>	<p>Outside the scope of this SPD</p>	<p>No change</p>
	<p>Fig 13: This helpful diagram needs a little more context or explanation.</p>	<p>A figure description has been added</p>	<p>Change made to Figure 13</p>
	<p>Fig 14: All these excellent photos need a caption to help convey the message they are supposed to give.</p>	<p>A brief description has been added to complement the photos.</p>	<p>Changed Figure 14 added descriptions</p>
	<p>Para No 9.5: What is the point of checking the soil, when the reality of construction sites is that it is removed and sold because there is no room to accommodate it on site? Especially as</p>	<p>Outside the scope of this SPD.</p>	<p>No change</p>

	the developer often brings in manufactured soil when required.	Under the current planning process soils are only considered for mineral extraction which would be a county matter.	
	Para No 9.10: Developers often strip away, or plough up, pasture prior to any ecological assessment. How can that be stopped?	Outside of the scope of this SPD. We have included some additional information for reference under the BNG section of the document. Anti trashing rules apply. BNG uses the base line habitats. If a site has been cleared we required a worst case scenario and so habitats at 'baselines' will be assumed to be the best quality habitats found on the site through local records and aerial imagery.	See impact assessment changes (pages 27,28)
	Para No 9.12: We are pleased to see Building with Nature referenced but it needs integrating into the rest of the advice. It reads as an afterthought.	Document update throughout.	Document updated throughout.
	Para 11.14: Does CBC have the capacity to undertake its part of this ambitious monitoring exercise?	Yes – it is our statutory duty and we must provide BNG reporting of results.	No change
	Para 12.1: Surely the first question to ask is whether the applicant has read this SPD?	It is assumed that the applicant has read the contents of this SPD	No change
Historic England	Asks that the SPD reflects the relevance of the Historic Environment mindful of recent guidance ' <i>Nature recovery and the historic environment, Natural England, 2023</i> ' where protecting and enhancing the historic environment is considered a defined outcome of nature recovery. Examples of ecologically important sites that are heritage assets are: ancient and veteran trees within	Noted to reflect this.	Amended see section: 8.4 (vii)

	historic parts or gardens important for natural foraging		
	Suggests looking into 'Planting Trees for the Future Whilst Protecting the Past' as a guide to tree planting in historic environments as planting trees in historic environments demands special care due to potential impact on designed views, archaeology... etc.	Noted An acknowledgement of the relationship between ancient veteran trees and heritage has been incorporated. However, for more detail please refer to tree strategy as this is outside the scope of this SPD.	Amended see section 8.4 (vii)
	Six locally designated wildlife sites are not explicitly safeguarded; mapping undervalues local sites by mapping areas outside the borough instead of in.	Wildlife sites and green spaces in and outside of Cheltenham are represented in this SPD.	Cleeve Common SSI and Badgeworth SSSI now included in 1.5 and 1.8
Gloucestershire County Council (GCC)	Protect Before Offset Principle: Strong objection to reliance on biodiversity offsetting; preference for onsite protection as first priority.	We will comply with the BNG hierarchy. Onsite net gain is our first priority. Where this is unachievable due to constraints, we will consider habitat units (local provider within Gloucestershire) and as a last resort statutory credit. Details in section 6 – but as it is national policy no change can be made.	No change
	Stronger Safeguards for Key Features: Calls for enhanced protection of ancient/veteran trees, historic hedgerows, wildlife corridors; oppose offsite compensation for their removal. The target should be for every home to be within 250 metres of a mature tree.	For management of ancient and veteran trees please refer to page 11 of the tree strategy. In reference to targets on mature trees; an increase of 20% in canopy cover has been recommended by central government which CBC urban design team are working on.	No change

Gloucestershire County Council (GCC)	River Chelt requires active protection from pollution, flooding and invasive species, especially Himalayan Balsam.	Agreed- air pollution NE new guidelines Air pollution and development: advice for local authorities - GOV.UK has been included. Invasive species identified in planning applications is covered by the Wildlife and Countryside Act 1981 (as amended) under Schedule 9, which makes it an offence to plant or otherwise cause these species to grow in the wild. In addition, under the Environmental Protection Act 1990, this species is classed as 'controlled waste' and must be disposed of safely at a licensed landfill site.	Section 9.7 updated
	Policy and Enforcement Weakness: Existing local policies are too vague to refuse development; enforcement capacity and mechanisms (including 30-year commitments) are inadequate.	Please see updated BNG section. BNG enforcement is proactive. Enforcement outside of BNG not in the scope of this SPD.	No change
	Applicability to Small Sites: Concern that exemptions and simplified assessments for small sites undermine biodiversity objectives of 10% improvements given Cheltenham's development pattern especially in Charlton Kings.	BNG exemption is set to be expanded. 10% net gain will not be required for sites of 0.2ha or below from sometime this year (no set date yet). We can't change it in the SPD	No change
	Climate Adaptation and Green Infrastructure: SPD insufficiently addresses adaptation measures (flooding, drought, overheating) and lacks strong green infrastructure requirements.	Green and blue infrastructure section has been added. And also, please see climate change SPD.	Changes made, please see section: 9.11, Figure 14 and 'The Building with green infrastructure standards' section page 34

Gloucestershire County Council (GCC)	Community Access and Education: Need for stronger protection of wildlife features near schools and improved footpath connectivity for health and wellbeing benefits.	Agreed, however outside the scope of this SPD	No change
	Reliance on LNRS Quality: SPD effectiveness depends heavily on the accuracy and completeness of the Gloucestershire Local Nature Recovery Strategy.	Outside the scope of this SPD – Both documents are meant to complement each other.	No Change
	GCC recommends the inclusion of protecting heritage and the historic environment as part of the delivery of nature recovery co-benefits. GCC suggests to refer to Nature England’s ‘Nature Recovery and the Historic Environment’ which highlights links between heritage assets and biodiversity networks. GCC also note that actions to improve soil, health and water quality are similar to those taken on heritage features	A reference to the importance between heritage and nature has been incorporated into the SPD	Changes made to 8.4 (vii)
	Further clarification is advised on paragraph 9.15, ecology/biodiversity officers may consider lighting requirements for the development’s lifetime. Refer to “guidance notes for the reduction of obtrusive light” .	Now included a section on lighting	See page 38 on noise, vibration, light and air pollution impacts on wildlife.
	Further clarification is asked on the sections relating to Biodiversity Net Gain (BNG) and the Local Nature Recovery Strategy (LNRS) ie, sections 4,5,6,7,10,11.	This has been updated to clarify	Please see sections referenced in comment. In particular sections 6 and 7.

Gloucestershire County Council (GCC)	GCC officers recommend that the Nature Recovery SPD should be aligned with countywide guidance and that it should be referenced. Countywide guidance is due to be updated in 2026 so there is a potential risk of the BNG content in the SPD being dated.	This SPD has been produced to align with current policy. Although we recognise upcoming changes for BNG, we have to rely on current policy.	No Change
	Section 3, to be reviewed as important legislation is not included eg: The Wildlife and Countryside Act 1981.	Addressed and resolved by previous comment. A change has been made to incorporate this.	Wildlife and Countryside Act 1981 included in (vii) of section 3.2.
	In Section 3, the Environment Act 2021 does not need to say, "as amended".	This has been changed to not say "as amended"	Changed to correct wording
	In section 4, more detail is needed explaining what a BGP is, what trading rules are and the options available to achieve BNG on and off-site.	Figures have been updated as well as entire BNG section.	See changes in sections 4,5 and 6 (BNG)
	Sections 5,6 and 10, should explain that a draft BGP or evidence that the net gain requirement can be met offsite, should be submitted as part of the planning application	BNG section updated to reflect this	See changes in sections 4,5 and 6 (BNG)
	In the list of exemptions ii, and iii should be indented to show that they pertain to the first bullet point. "vii" should not be a bullet point; it is the start of a new list.	BNG section updated	See changes in sections 4,5 and 6 (BNG)
	Wording in the SPD creates confusion about when a Section 106 agreement is required for Biodiversity Net Gain (BNG). It should be	BNG section updated to clarify this	See changes in sections 4,5 and 6 (BNG)

Gloucestershire County Council (GCC)	clear that s106 applies only where there are significant on-site gains, not for all developments.		
	The SPD does not clearly state that s106 agreements and Conservation Covenants are managed by the Habitat Bank owner, not by the developer during the planning application process.	BNG section updated to clarify this	See changes in sections 4,5 and 6 (BNG)
	In Paragraph 9.12 promoting Natural England's Green Infrastructure Framework/Standards could be more suitable as they are the Statutory Nature Conservation Organisation (SNCO).	A section on Natural England Green Infrastructure standards has been added	See pages 35,36.
	Pleased to see mention of the LNRS in section 7, and that the SPD will be crucial in delivering LNRS.	This comment has been noted.	No change
	The SPD lacks significant detail on Biodiversity Net Gain (BNG) and Local Nature Recovery Strategy (LNRS), reducing clarity and usability. Some statements about legal agreements and procedural requirements are inaccurate, creating potential confusion for implementation.	BNG section has been updated and resolved this response.	See changes in sections 4,5 and 6 (BNG)

<p>Richard Lawler</p>	<p>Proposal for the final SPD to include reference to multi-layered planting systems as a ‘three-layer greening’ approach combining trees, shrubs and ground vegetation, which aligns with the Tree Strategy and Building Nature Standards. Proposed wording “Developers and land managers should consider multi-layered planting structures- combining trees, shrubs and ground-layer vegetation-as a means of maximising biodiversity net gain, ecosystem resilience, and amenity value within urban sites.”</p>	<p>We agree with this point and will incorporate it into the SPD. However, the wording will be changed from “Developers and land managers should incorporate multi-layered...” We will also not include the wording “maximising biodiversity net gain”.</p>	<p>Included in Figure 14</p>
	<p>The SPD should provide guidance on retrofitting biodiversity measures into existing housing estates, verges and council-managed open spaces, not only new development.</p>	<p>Outside the scope of this SPD</p>	<p>No change</p>
	<p>Monitoring and Biodiversity Net Gain reporting should be made public through an online register so residents can track long-term delivery.</p>	<p>Outside the scope of this SPD</p>	<p>No change</p>
	<p>Tree canopy targets and tree-equity mapping from the Tree Strategy should be clearly embedded in the SPD.</p>	<p>However, we are unable to provide tree canopy targets as we don’t have these imbedded in any local plans yet.</p>	<p>No change</p>

Richard Lawler	Add local examples of biodiverse Sustainable Drainage retrofits such as rain gardens, soakaway planters and sedum strips for car parks and flats.	Noted and included images of local examples for reference as well as links to relevant articles	Please see change made in: Figure 14 page 33.
	Encourage schemes that deliver both biodiversity and community value, such as resident planting projects or school-linked wildlife areas.	The parks and green space work closely with the community, please see details in the Biodiversity Duty report which will soon be published.	No change
	Consider adding local biodiversity indicators such as pollinator counts or bird-box occupancy to supplement the statutory biodiversity metric.	Outside of the scope of SPD.	No change
	Provide a community toolkit for small-scale greening projects so that parish councils and residents can contribute towards borough-wide biodiversity goals.	Outside the scope of SPD	No change
	Introduce an annual Nature Recovery Statement to Cabinet and Scrutiny, reporting progress on Biodiversity Net Gain and Local Nature Recovery Strategy delivery.	Outside the scope of this SPD. Annual biodiversity duty reporting will be undertaken.	No change
Jan Foster: County/District Councillor/Local Resident	Weak Wording on Onsite BNG Requirement: SPD states it is the Council's "preference" for Biodiversity Net Gain (BNG) to be delivered onsite, which is considered too weak. Respondent wants a clear obligation for developers to achieve the maximum possible onsite gain	Wording in the document is technically accurate CBC can only have preference or recommend. It is not an obligation to deliver onsite it is a preference.	No change
	Over-Reliance on Habitat Bank Credits: Concern that developers could use credits for the entire 10% BNG target rather than combining onsite measures with credits. SPD	BNG section updated.	See changes in sections 4,5 and 6 (BNG)

Jan Foster: County/District Councillor/Local Resident	should require partial onsite delivery wherever feasible.		
	Lack of Mitigation Measures for Shortfalls: SPD does not specify that developers must mitigate onsite shortfalls through features such as bat boxes, swift houses, garden ponds, etc., when full onsite BNG cannot be achieved.	BNG section updated. Features such as bat boxes come under NPPF outside of BNG and these will still be required. These features are additional to BNG and cannot be included as an enhancement to habitats. They are an enhancement to development for roosting features required in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (Chapter 15).	See changes in sections 4,5 and 6 (BNG)
Sue Jenkins: Planning consultant	Pa No 2.4 :You can't buy habitat with products e.g. bat boxes, swift bricks, bee hotels etc. The habitat is all the surrounding vegetation (landscape), which provides food for wildlife.	These features are additional to BNG and cannot be included as an enhancement to habitats. They are an enhancement to development for roosting features required in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (Chapter 15)	See changes in sections 4,5 and 6 (BNG)
	Page 11 JCS page 84 - Omit green walls as totally unsustainable and replace with climbing plants.	Outside the scope of this SPD	No change
	Are Tree Protection Orders different from Tree Preservation Orders?	No, they are not.	Wording corrected to Tree Preservation Order throughout.
	Pa No 5.3: Who is going to check management for 30 years and administer the legal agreement? You do not check existing landscape conditions for 7 years. Same applies to 11.4	Senior planning ecologist and monitoring research officer in line with our Biodiversity duty.	No change
	Pa No 6.2 How does habitat bank (land bank), help residents/biodiversity of Cheltenham.	All development must conform to the mitigation hierarchy, local habitat banks are preferred but CBC are bound by BNG legislation. They help maintain BNG requirements	See changes in sections 4,5 and 6 (BNG)

	Pa No: 7.0 CBC may support Glos LNRS, but no guarantee they will help Cheltenham.	LNRS is a material consideration that is taken into account when deciding local planning applications in the borough. outside scope of this SPD	No change
	Pa No 8.2 Tree Strategies should have target percentages for planting and calculate lost trees as well.	Outside the scope of this SPD, see tree strategy.	No change
	Pa No 9.5: What is the point of checking the soil, when the reality of construction sites is that it is removed and sold because there is no room to accommodate on site. Then the developer buys in manufactured soil when required.	Outside the scope of this SPD	No change
	Pa No 9.10: A developer will strip or plough up pasture prior to any ecological assessment.	Outside the scope of this SPD. Please refer to section on BNG regarding anti trashing. .	No change
	Pa No 11.14 : See 5.3 above	BNG section updated	See changes in sections 4,5 and 6 (BNG)
Liz Shield: Planning/consultant from SF planning	Unclear Wording on S106 Requirement for Onsite BNG: Para No 10.2 suggests that developers offsetting biodiversity losses onsite (or offsite within the LPA boundary) must secure BNG delivery and register the site via a Section 106 agreement, creating ambiguity about whether all onsite BNG must be registered like a Habitat Bank.	BNG section updated to clarify.	See changes in sections 4,5 and 6 (BNG)
	Registration Requirement Needs Clarification: It is unclear if the Council intends to require full registration of onsite BNG on the National BNG Sites Register. If so, this introduces	Legal agreement and registration only required for habitat gain sites not sites meeting statutory BNG. Statutory BNG secured via planning condition unless 'significant' gain. BNG section updated	Section 6 updated to make clearer BNG section.

	additional costs and processes that are not legally necessary		
	Potential Misinterpretation of Council's Intention: If the intention is not to require registration for all onsite BNG, the SPD should include clear wording to avoid confusion and ensure developers understand when registration and S106 apply.	Wording updated	See changes in sections 4,5 and 6 (BNG)
	Para No 10.3: This refers to a need for conservation covenants in respect of off site BNG. However, Cheltenham Borough Council is not a responsible body. Is Cheltenham Borough Council proposing to register as a responsible body or will a developer be required to enter into the covenant with a third part e.g. Gloucestershire County Council?	Conservation covenants are outside of the LPA scope. The covenant would be with the landowner and NE. BNG section updated	See changes in sections 4,5 and 6 (BNG)
	Para No 4.5: This section may become out of date if the DEFRA proposals which were consulted on earlier in 2025 come into effect which amend the exemptions for providing BNG. The Council should perhaps consider waiting to see the outcome of the DEFRA consultation if possible.	Exemption set to be 0.2ha or below, however no date for when this change will come into effect.	No change
Sara Trimarco: Local Resident	Need for Explicit Protection of Existing Assets: The SPD should clearly require protection of important hedgerows, veteran and notable trees, and the six local/key	This SPD cannot require protections; however, we have now linked sections to the relevant policies.	No change

	wildlife sites identified by Gloucestershire Wildlife Trust.		
	Safeguarding Unique Breeding Grounds: Explicit reference is needed to protect breeding grounds for declining species, particularly invertebrates, reptiles, and songbirds, within the borough.	This SPD cannot require protections; however, we have now linked sections to the relevant policies.	No change
Oliver W-J: local resident	Section 8 Tree Strategy: Broadly support, but please consider the possibility of tree removal where the roots significantly impact the pedestrian landscape (uneven) and make walking different. Consider replacing concrete with block paving, which improves drainage versus concreting over any pavement repairs.	Outside the scope of this SPD	No change
Nicola Hilary: Gloucestershire Local Nature Partnership	Clarification of LNRS Wording: The SPD currently states that habitats “within” the LNRS have high strategic significance and those “not within” have low significance. This is considered inaccurate. The wording should reflect that significance applies to habitats mapped within Areas that Could Become of Particular Importance under the LNRS.	This has been previously addressed, and the corresponding change has been made.	Change made to para no 7.4
	Alignment with Updated LNRS Guidance: The SPD should incorporate the refined wording and approach from the emerging Gloucestershire Local Nature Recovery Strategy to ensure clarity on when high strategic significance applies in the statutory biodiversity metric.	The correct wording will be incorporated to align with LNRS.	Change made as resolved by previous comment Change made to para no 7.4

Jackie Chelin: County/ District Councillor/ Local resident	Resource and Capacity Concerns: While the SPD is considered balanced and necessary, there is concern about whether planning applicants will fully engage with its requirements and whether CBC has sufficient resources including staff and expertise to manage pre-application advice, monitoring, and enforcement effectively.	It is expected that CBC has the necessary resources to manage, monitor and enforce the contents of this SPD.	No change
	Need for Clear Roles and Partnerships: The document does not clearly outline the partner organisations expected to support checks and provide specialist input, which could affect implementation and efficiency.	There is a Gloucestershire Nature Partnership that CBC participate in.	No change