

Comments on Cheltenham Borough Council's draft *Nature Recovery Supplementary Planning Document*

We welcome the preparation of this document and the intention that it should stand alongside the Climate Change SPD. Action to support the recovery of nature¹ in our town is welcomed by the Civic Society.

We have two major comments and a number of detailed points (annexed).

Establishing a strong planning policy context

The draft SPD refers to the various nature-related policies in place in the Development Plan. But what is missing is a plan for nature recovery in the CBC area. A plan of this kind is needed to give context to the matters covered by the SPD. The possible scope of such a plan is apparent in the draft Gloucestershire Nature Recovery Strategy², which highlights the potential to restore nature in certain areas.

A nature restoration plan for Cheltenham would build on the county strategy. It might incorporate some of the early sections of the draft SPD and include policies such as:

- 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. The establishment of this network could be funded through BNG payments. This would much enhance connectivity for wildlife.
- The creation of several new local nature reserves, to form “nodes” in the above network.
- Flood prevention, including the prevention of surface water flooding, designed to coordinate public sector actors, statutory undertakers and local groups in creating local plans (using porous surfaces, water gardens, water harvesting etc). This would link flood prevention and nature protection and recovery.
- Land management standards for parks and other public green spaces, such as road verges, and school and hospital grounds, to support nature recovery
- 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.

¹ Note that nature ‘recovery’ is more ambitious than nature ‘protection’ by including actions to bring back nature to places from which it has been lost.

² Our comments on that document can be read here: [CCS-comments-on-GCC-Nature-Recovery-Strategy-Sep25](#)

- Policies to encourage nature-friendly management of private land, especially of gardens.
- Support for community engagement designed to help nature recovery.

We urge CBC to follow the adoption of the draft SPD with the preparation of such a plan.

Making the message user friendly

The draft SPD is quite long and – necessarily – pretty technical in places, for example the description of how BNG works or the discussion of offsetting. This may be appropriate for large developers who are used to engaging in the planning process and have deep pockets. But it will be very off-putting for small developers and individual householders, however favourably minded they may be towards respecting and protecting nature.

We suggest that CBC do three things:

- Review the draft with a view to making it more reader-friendly, e.g. by shortening the text, adding diagrams and more images, highlighting certain bits of key text and using other devices to make it more accessible and understandable. The council's excellent Climate Change SPD should be used as a model.
- Prepare a simple leaflet to support the policies in the draft SPD aimed at assisting householders, covering the quite basic things they can do to restore nature, from installing water butts to catch run-off from roofs and using permeable surfaces for car parking to adopting a 'no-mow May' treatment of lawns. This could be done jointly with the Gloucestershire Wildlife Trust.
- Just as CBC has launched a very welcome initiative in the form of the Cheltenham Heritage Project, so it should consider a similar council-led initiative around a Cheltenham Nature Restoration Project. That would be good way to bring together the various stakeholders to help deliver the purposes of the draft SPD and so make its messages more widely understood.

Conclusion

We welcome CBC's intention to publish an SPD on nature restoration. We have comments on the draft (annexed) but call on the Council to look closely at the points made above.

Annex – detailed comments on the draft SPD

Para. no. etc.	Comment
1.4	Here alone the text addresses the reader as “you”. Either it adopts this friendly style throughout – or not at all.
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
1.5	We understand that the Leckhampton Hill SSSI is to be designated as a National Nature Reserve in 2026.
1.6	The Severn lies to the <u>west</u> of Cheltenham!
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.
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?
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.
Fig. 1	Tree Protection Orders should be Tree Preservation Orders
Ch.4	Will this need to be changed by the measures likely to be introduced in the emerging Planning and Infrastructure Bill?
4.5	This table is confusing as it combines two levels in a hierarchy of information
4.7	This paragraph is confusing (though that may be the fault of the legislation)
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.
6.2	The inclusion of new abbreviations (EcIA and PEA) suggests this SPD will need a glossary. Also how does a habitat bank (land bank), help residents and biodiversity of Cheltenham?

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.
8.2	Tree Strategies should have target percentages for planting and calculate lost trees as well.
9.1	You could even add that conserving biodiversity adds to property values, since many people seek a natural setting for their homes.
Fig. 13	This helpful diagram needs a little more context or explanation.
Fig.14	All these excellent photos need a caption to help convey the message they are supposed to give.
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 the developer often brings in manufactured soil when
9.10	Developers often strip away, or plough up, pasture prior to any ecological assessment. How can that be stopped?
9.12	We are pleased to see Building with Nature referenced but it needs integrating into the rest of the advice. It reads an afterthought.
11.14	Does CBC have the capacity to undertake its part of this ambitious monitoring exercise?
12.1	Surely the first question to ask is whether the applicant has read this SPD?