

Dear Sir/Madam,

10/11/2022

I am writing regarding the consultation on the Fairford Neighbourhood Development Plan. The documents have been reviewed against current legislation and targets. It is clearly a comprehensive and well researched document. However, the Wildlife Trust considers that the Plan could do with strengthening in its commitment around the declared climate and ecological emergency, especially with regard to wildlife and Biodiversity Net Gain (BNG) policy.

Biodiversity and Wildlife

There are some interesting policies mentioned within the Fairford NDP and they do support the inclusion of wildlife in the future but do not address the wider concerns for BNG, wildlife enhancement and the targets set out in National legislation. The Government's 25 Year Environment Plan and the Revised National Planning Policy Framework states that biodiversity and geodiversity policies should move beyond conservation of sites and species and instead promote the restoration and enhancement of priority habitats and ecological networks (which is not the same as a biodiversity network). FNP 10 for instance, contains useful information on the Coln Valley but it does not mention that it is part of the wider Cotswold Valleys Nature Improvement Area (NIA). This is a Defra backed scheme to ensure sustainable development within the NIAs to achieve multiple benefits for people, wildlife and the local economy.

New Statutory responsibilities are expected in the Environment Act, including mandatory Biodiversity Net Gain, Nature Recovery Networks and Local Nature Recovery Strategies. The Wildlife Trust has been working with the Gloucestershire Local Nature Partnership to update local strategies and evidence based in-line with these changes. Policy FNP11 Valuing Hedgerows and Trees contains an opportunity to push for Plan wide BNG and not just replacement. Improvements would be possible through minor alterations, to create more substantial policy that made reference to BNG and its value in supporting the Nature Recovery Network.

The NDP could lead the way for local plans by providing some context on what species and habitats are characteristic to a particular local area.

Green Infrastructure

There is a growing evidence base that Green Infrastructure (GI) quality is a crucial factor in determining whether benefits are for the environment and society. High quality GI is vitally important in a climate and ecological emergency and something that councils and organisations around the county have committed to through the Gloucestershire GI pledge. Gloucestershire is the home to 'Building with Nature' (BwN), which is the UK's leading quality benchmark for Green Infrastructure in new development. Building with Nature was developed in partnership

with the Gloucestershire Local Nature Partnership and Local Authorities, with funding from Innovate UK and The Ministry of Housing, Communities and Local Governments. Inclusion of a positive wildlife based GI policy that potentially referenced BwN could help to focus designing for the promotion and improvement of wildlife, for example in FNP12. FNP14 “A New Low Carbon Community in Fairford” does mention the use of BwN in delivery. However, it is also an ideal opportunity to include a separate clause requesting a minimum of 10% BNG, with the ideal goal being closer to 20%.

The Wildlife Trust would be happy to comment when the plan is next reviewed.

Yours Faithfully

Robyn Bradley

Building with Nature Lead