Gloucestershire County Council

Local Developer Guide

Infrastructure and Services with new development – consultation draft

Comments of the Cotswolds Conservation Board

The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes¹:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment of the special qualities of the AONB. In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.
- A general comment is that the initial parts of the document are confusing. Reference is made to parts of the –planning system that are no longer relevant or out of date. These sections could do with editing to the most pertinent points. Much of the detail could be better provided in appendices.
- 2. Although it is acknowledged by the Board that paragraph 67 of the draft guidance suggests that the guidance is not exclusive the Board is disappointed to note that the Guide does not include any reference to the provision of Green Infrastructure (GI).
- 3. Paragraph 30 gives some examples of infrastructure. The Board considers that GI should be included in the list.
- 4. Green Infrastructure includes parks, open spaces, country parks, rights of way, playing fields, woodlands, wetlands, grasslands, river corridors, allotments, trees, hedgerows and private gardens. The provision of some of these types of GI is the responsibility of the County Council.
- 5. The delivery of high quality Green Infrastructure has benefits for people (physically, psychologically and nutritionally), natural processes and biodiversity.
- 6. The National Planning Policy Framework (NPPF) states the following about Green Infrastructure:

Within section 10 - Meeting the challenge of climate change, flooding and coastal change: (Para 99) –

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¹ Section 87, Countryside and Rights of Way Act 2000.

'Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure'.

Within section 11 - Conserving and enhancing the natural environment: (Para 114) -

'Local planning authorities should:

• set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure...'.

In the glossary (Annex 2):

'Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.'

7. Therefore the Board would wish to see a section within the final document which explains how and why the County Council will seek developer contributions towards the provision of GI, especially those elements which are the responsibility of the County Council, including rights of way and other access to the countryside.