



Wildfowl & Wetlands Trust (WWT) written statement in response to Matter 1; Question 9

This written statement is in response to Matter 1; Issue 1.2; Question 9 of the Inspectors' matters, issues and questions: "Does the HRA adequately address whether the Plan would adversely affect the integrity of relevant European sites either alone or in combination with other plans or projects? Are the HRA conclusions robust?"

It is further to our response to the Regulation 19 Consultation on the Stroud District Local Plan. This is marked response 68 and can be seen on pages 237, 238, 291, and 292 of SLP-01a.

Lack of updated recreation mitigation strategy for the Severn Estuary European site

Our previous statement noted that details of the mitigation measures that will be adopted to ensure no adverse impact on the Severn Estuary SPA/SAC/Ramsar site were lacking and the Stroud District Council noted their intention to bring forward a revised mitigation strategy for recreational pressures on the Severn Estuary (SLP-01a page 291). The HRA notes that an updated strategy is necessary to rule out adverse impact on the integrity of the Severn Estuary European site (document EB85, pages 59 and 60). Therefore, without this updated mitigation strategy the HRA cannot adequately address whether the Plan would adversely affect the integrity of the European site. In particular, adverse effects from site allocations PS34 and PS36 cannot be ruled out without an updated mitigation strategy to which these sites will need to contribute resources (document EB85, pages 54, 55, 59 and 60)

The HRA was written almost 2 years ago, in May 2021 and yet the updated recreation mitigation strategy has not been brought forward. To ensure no adverse effects of the plan on the integrity of Severn Estuary European site, the updated strategy must be brought forward before the plan is put into effect.

Therefore, within the supporting text for Delivery Policy ES6 (document CD1, pages 291 to 293) the necessity of updating the Severn Estuary recreation mitigation plan should be noted and a specific date for publishing this plan should be given. This should be before site allocations that will affect the Severn Estuary (including PS34 and PS36) begin construction. Wording should therefore be added to this effect: "An updated recreation mitigation strategy for the Severn Estuary SAC/SPA/Ramsar site will be published by X date and construction on developments affecting the Severn Estuary will not proceed before this is published" Furthermore, similar text should be added in the policies for PS34 (document CD1, page 172; text "An updated recreation mitigation strategy for the Severn Estuary SAC/SPA/Ramsar site will be published by X date and construction on the site of PS34 will not proceed before this is published") and PS36 (document CD1, pages 178 and 179; text: "An updated recreation mitigation strategy for the Severn Estuary SAC/SPA/Ramsar site will be published by X date and construction on the site of PS36 will not proceed before this is published").

Lack of confirmation of the diversion of the Severn Way

A further measure mentioned in the HRA as necessary to rule out adverse effects on the Severn Estuary SPA/SAC/Ramsar site is the diversion of the Severn Way promoted route in vicinity of PS36 (document EB85, page 57). This is also mentioned in the Draft Plan (document CD1, page 178).



However, powers to divert public rights of way do not lie with Stroud District Council but with Gloucestershire County Council as the Highway Authority. Confirmation that Gloucestershire County Council are amenable to diverting the right of way has not been given. Therefore, currently, the HRA cannot adequately address whether the Plan would adversely affect the integrity of the Severn Estuary as a necessary measure to rule out adverse effects is not confirmed.

Assurance must be given that construction on the site of PS36 will not proceed before diversion of the Severn Way has been secured to rule out adverse effects on the Severn Estuary. Therefore, the policy for PS36 (document CD1, pages 178 and 179) should be updated to reflect this. Wording should be added to this effect: "Construction of the development will not commence until assurance that the Severn Way can be diverted has been secured".