

[REDACTED]

From: James Robinson <James.Robinson@wwt.org.uk>
Sent: 20 July 2021 13:18
To: WEB_Local Plan
Cc: [REDACTED]
Subject: Stroud District - Pre-submission Draft Local Plan: Regulation 19 consultation - response form

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam

The Wildfowl & Wetlands Trust (WWT) previously submitted a response to the consultation (18 June 2021) outlining our concerns about a number of proposed allocations. Our response was, in large part, based on the content of a Habitats Regulations Assessment (HRA) that was available on the consultation page at that time and which we quote from in our response. We have since been advised by officers at SDC that the HRA that we were scrutinising was not the most recent version (emails from SDC on 15 July 2021 and 19 July 2021). We still believe that the HRA made available on the consultation landing webpage at the time of our response was not the most recent version which now appears on the consultation website. We appreciate that this is disputed by SDC but we have also been made aware that other concerned parties noticed this change too.

The most recent HRA provides evidence that mitigation measures have been identified for those developments that could potentially impact the Severn Estuary SPA/SAC/Ramsar site adversely, particularly PS34 and PS36. Although we are pleased to see this work has been undertaken (we asked for this in our original response), we remain concerned that the specific details of the mitigation measures that will be adopted remain scant and that alternative proposals to these allocations (i.e. avoiding allocations that are deemed to have a significant effect without mitigation), appear to have been dismissed at this stage. The assessment of alternative allocations that would avoid significant effects is a key step in the Habitats Regulations process. We assume that more detailed HRA activity will be submitted with any detailed planning proposals but we would expect to see more certainty about the Council's intentions in the Local Plan to provide absolute reassurance that alternatives that avoid creating significant effects have been assessed and dismissed and/or that proposed mitigation measures are confirmed, e.g. in an updated Severn Estuary Recreation & Mitigation Strategy.

We would like this email to be presented to the Planning Inspector as an addendum to our original response so that our concerns about the presentation of the HRA and the lack of time we have been able to scrutinise the new documentation can be taken into consideration. We thank SDC for allowing us to do this following their advice on 15 July 2021.

Yours sincerely
James Robinson

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Director of Conservation

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