



Wildfowl & Wetlands Trust (WWT) written statement in response to Matter 6f; Question 43b

This written statement is in response to Matter 6f; Question 43 of the Inspectors' matters, issues and questions, with respect to site allocation PS34: "Has the impact of this development proposal on the Severn Estuary SAC/SPA/Ramsar site been suitably assessed as part of the process to allocate this site? Is it clear what avoidance and mitigation measures may be necessary?"

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 and 238 of SLP-01a.

Our previous statement noted that details of the mitigation measures that will be adopted to ensure no adverse impact of PS34 on the Severn Estuary SPA/SAC/Ramsar site were lacking and the Planning Authority 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 this strategy is necessary to rule out adverse impact on the integrity of the Severn Estuary European site (document EB85, pages 54 and 55). Without the updated mitigation strategy, it is not clear what avoidance and mitigation measures may be necessary to avoid adverse impacts of PS34 on the Severn Estuary.

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 PS34 begins 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 policy for PS34 (document CD1, page 172). "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"