

HRA update on the Stroud District Local Plan Review Pre-submission Draft Report

Introduction

- 1.1 This note is an update to inform on progress of the Habitats Regulations Assessment (HRA) of the Stroud District Local Plan Review Pre-submission Draft Plan. An HRA assesses the implications of a plan for legally protected European sites. Work on the HRA report, prepared by Footprint Ecology on behalf of Stroud District Council, continues and a full HRA will accompany the consultation of the Plan.

THE HRA process

- 1.2 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. Importantly, the most recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019¹) take account of the UK's departure from the EU.
- 1.3 Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of the HRA alongside recent Government Guidance on the interpretation and application of the Regulations². HRAs follow a step-by-step process which involves an initial screening for likely significant effects, following by appropriate assessment and the integrity test. Full details of the background and process can be found in the previous HRA reports.

Previous HRA work

- 1.4 HRA is an iterative process and each stage of the Local Plan review has been accompanied by an HRA report. These included:
- A report with HRA considerations that accompanied the additional consultation in 2020.
 - An HRA report produced at the Draft Plan stage in 2019.

¹ The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

² Habitats regulations assessments: protecting a European site. Defra and Natural England. 24 February 2021.
<https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> (accessed 4 March 2021)

1.5 Since the additional consultation in 2020, we have also been involved in a number of meetings with respect to the Sharpness allocation and a Cotswold Recreation Mitigation Strategy has been produced in draft. Work on the HRA Pre-submission Draft Plan is continuing and it is anticipated that the HRA will be finalised in May, once further information such as traffic modelling is available.

European sites to be considered in the screening of the plan and relevant impact pathways

1.6 The initial screening of the Plan identified potential risks for the Cotswold Beechwoods SAC, Rodborough Common SAC and the Severn Estuary SPA/SAC/Ramsar site. There are a range of possible means by which the content of the Plan could affect European site interest features. Potential impact pathways, adapted from the previous HRA work, are summarised in Table 1.

Table 1: Summary of potential impact pathways – i.e. potential mechanisms whereby the different European sites could be impacted. (✓)= possible/lower concern included on precautionary basis

Site	Urban effects	Loss of supporting habitat	Recreation	Water issues	Air quality
Severn Estuary SAC/SPA/Ramsar site	✓	✓	✓	✓	(✓)
Cotswold Beechwoods SAC	✓		✓	(✓)	✓
Rodborough Common SAC	✓		✓	(✓)	✓

Urban effects

1.7 Urban effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as cat predation, impacts from lighting, invasive species, fly tipping and vandalism. These impacts are particularly relevant where development is in close proximity, within a few hundred metres of the site boundary.

1.8 For urban effects, outstanding work is to check for allocations and quantify the overall likely change in housing growth in proximity of the European sites. The main concerns relate to the Sharpness allocation where risks from urban effects have been identified and the Plan includes requirements that housing will be set back from the European site boundary and buffered by greenspace and the proposed nature reserve (with no public access).

Loss of supporting habitat

1.9 Natural England have advised that there is no requirement to undertake an assessment of saltmarsh or other intertidal habitat loss within the Severn Estuary

SPA/SAC/Ramsar as part of the local plan HRA as there are no physical defences being built or maintained.

- 1.10 Many European sites support mobile species which can use land outside the European site boundary, for example waders and wildfowl can use farmland and low-lying land around estuaries as feeding or roost sites. Land around the periphery of European sites may also be important for land management or for future management, for example in relation to realignment and coastal squeeze on estuaries. These issues are relevant to the Severn Estuary SPA/SAC and Ramsar.
- 1.11 For Sharpness, these issues have been discussed and reviewed in detail, involving Natural England and the Environment Agency. Requirements for a nature reserve that will provide safe feeding and roosting sites for SPA birds are included in the Plan and these should resolve concerns for loss of farmland habitat. Flood risk modelling will be necessary for the HRA to ensure that the Nature Reserve can provide sufficient lasting mitigation and the results are still awaited from the project proposers. Risks to Eels (a qualifying feature of the Severn Estuary SAC) have also been addressed, with survey work highlighting occurrence at particular ponds that can be protected and further checks undertaken at project level HRA, accompanying any planning application.
- 1.12 We are anticipating further responses from Natural England and the Environment Agency regarding the above issues and these views will be informed by the flood-risk modelling that is still to be made available.

Recreation

- 1.13 Recreation impacts relate to the increased use of European sites (and functionally linked land) for recreation, as a result of more people living nearby. All the relevant sites have extensive public access and are attractive, extensive countryside sites. They therefore provide obvious destinations for recreational use. Issues include disturbance, trampling, eutrophication (e.g. dog fouling) and other contamination and increased fire risk.
- 1.14 Visitor survey work from the relevant European sites provides information on where visitors originate. For the Severn Estuary there is an established mitigation approach that applies a zone of 7.7km around the SPA/Ramsar. Visitor surveys from the Cotswold Beechwoods show that 75% of visitors (who were on a day-trip/short visit directly from home) originated from within 15.4km of the interview location. The equivalent figure for Rodborough Common is 3.8km.
- 1.15 A mitigation strategy has been prepared for the Cotswold Beechwoods SAC and this will ensure cumulative growth from multiple authorities can be adequately mitigated. The strategy is referenced in the Plan but needs to be implemented and the mitigation secured, ideally in partnership with neighbouring authorities. A mitigation approach for Rodborough Common SAC is also established, however this will require review and

revision to take account of new growth in the Local Plan. Similarly, a mitigation approach for the Severn Estuary is in place, this will require review and update.

- 1.16 The allocation at Sharpness would mean a particularly large increase in housing at a single location very close to the Severn Estuary SPA/SAC. The Plan includes specific requirements for the quality and amount of greenspace required to provide mitigation, alongside the need to contribute to the wider strategy for the Estuary as a whole. Also included in the Plan as mitigation is a proposal to divert the Severn Way footpath and the provision of a nature reserve with no public access to provide a disturbance-free area for SPA bird interest.

Water issues

- 1.17 Water issues include water quality and water quantity (i.e. water availability), and flood management. Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. Abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. Such impacts particularly relate to aquatic, wetland and estuary habitats.
- 1.18 Assessment of water related issues are primarily a check that the overall quantum of growth can be accommodated without compromising the ecological integrity of hydrologically sensitive European sites. Water supply was not deemed to be an issue for the District and the 2019 HRA work did not raise any concerns. Final checks are just required for the Pre-Submission Draft Plan in relation to the Severn Estuary SAC/SPA/Ramsar, particularly with respect to Sharpness.

Air Quality

- 1.19 Increased levels of traffic on roads that cross or run adjacent to European sites can result in reductions in air quality. These are primarily as a result of increased nitrogen deposition but are also related to increases in both sulphur and ammonia. Traffic generated air quality reductions can impact on vegetation communities.
- 1.20 Concerns relate to where there are roads within 200m of the European site. Major roads of concern are primarily the A46 which runs within 200m of both Rodborough Common and the Cotswold Beechwoods and no conclusions can be reached until traffic modelling results are available. There may be a need for further air quality modelling before adverse effects on integrity can be ruled out, alone or in-combination, for either Rodborough Common SAC or the Cotswold Beechwoods SAC.