Dea Mr McGee

SOUTH GLOUCESTERSHIRE CORE STRATEGY

Thank you for contacting Natural England regarding the representations we submitted to the Pre-Submission Publication Draft Core Strategy in August 2010.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The concerns outlined by Natural England in those representations were raised at a time before a significant amount of technical work regarding ecology at Severnside had been undertaken. With the completion of the Habitats Regulations Assessment of the South Gloucestershire Core Strategy undertaken by the Council in March 2011 and the Severnside & Avonmouth Wetland Habitat Project (‘Cresswell Report’), Natural England is satisfied that, subject to the wetland mitigation strategy identified in the report being implemented in full, development at Severnside can proceed in a manner that protects the conservation objectives and internationally important waterfowl of the Severn Estuary European Site.

We are also satisfied the Plan provides an effective mechanism for implementation of the wetland mitigation strategy, in particular 17.23 states that “S106, and other contributions and grant regimes will be sought to fund infrastructure improvements and the establishing and managing of any wetland habitats and Local Nature Reserves.” However it will also be necessary for the Policies, Sites and Places DPD and CIL charging schedule to set out how retained and new wetland will be secured, managed and protected in perpetuity.

Whilst the report assesses the likely impacts arising from land-take and disturbance/displacement, it does not include an assessment of other development-related impacts - such as the affect of new aerial/aquatic discharges on the SAC or renewable energy technologies - as the precise nature and location of development within the Severnside area is as yet unknown and
unpredictable and each would need to assessed individually under the Habitat Regulations 2010.

In addition, once secured, consideration will need to be given to retained and new wetland habitats to protect them from adverse impacts of new development, particularly in terms of their ability to support Special Protection Area (SPA) species.

Natural England can, however, confirm that we consider the Severnside Chapter and Policy in the Core Strategy, together with the Core Strategy’s overall approach to the Natural Environment and Green Infrastructure, to be sound and that previous concerns set out in our 2010 representations have been adequately addressed. This was also confirmed in our most recent representations to the Core Strategy in February 2011 which stated Natural England considers the Core Strategy to be sound and legally compliant."

I hope this letter clarifies Natural England’s position, however if you have further queries regarding the South Gloucestershire Core Strategy please contact Amanda Grundy on 0300 060 1454. For all other correspondence, please contact consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Amanda Grundy
Lead Adviser, Sustainable Land Use