

20/06/2023

SDC Response to Heather Smith Maps Matter 6a

Reference was made to the Shoreline Management Plan 2 and this was developed in partnership by local authorities, regulators and other stakeholders. Stroud District Council was actively engaged in the development of the Shoreline Management Plan (SMP). The SMP is a high level non-statutory policy document designed to assist coastal flood and erosion risk management planning. It provides a large-scale assessment of the risks (to people, property, the natural and historic environment) associated with coastal erosion and flooding along the coast over the long-term. It also proposes policies to help manage these risks sustainably over the next hundred years. The SMP enables planners and regulators to plan for and manage the way that the coast will change. This could be by maintaining or improving defences, by enabling the natural processes to play a greater role, creating new natural habitat or by helping areas that are at risk of flooding at some point in the future to cope with and limit the impact of flooding events. It aims to provide more certainty for landowners, residents and businesses; to know how the coast will be managed by regulators during the next 100 years, so that they can plan ahead and make decisions about investments, homes, development and the management of their resources. The Council formally adopted the SMP2 at Cabinet On 9th December 2010 Agenda Item 20. The SMP2 received final sign-off from Defra and Welsh Government in February 2017. The SMP2 actions include ensuring environmental issues are taken into account in the management and maintenance of defence work. This includes preventing disturbance to birds. has been used and raised in discussions between the Council, site promoters, and the Environment Agency during the Local Plan process. The SMP2 has been integrated with our strategic flood risk assessment work. The Sharpness site layouts evolved to address both the flood risk and biodiversity (HRA) issues. Council Officers continue to engage with the Severn Estuary Coastal Group (SECG) and the Environment Agency as part of the ongoing light touch SMP2 refresh. The Council recognise that it is important that the long-term policies in the SMP2 influence planning, land use and management around the shoreline in a sustainable way that does not put future generations at risk or impose unmanageable financial burdens. Flood and erosion defences reduce the risk to the assets they protect from flooding. They do not remove the risk completely. The Severn Estuary Shoreline Management Plan Review is reviewed and referenced in the SA Scoping Report (EB75) at paragraph 2.94.

Five images from the Severn Estuary Partnership's Severn Vision have been included in the additional evidence (ref REP-523-001). These screenshots are from a mapping exercise ('the Story Map' <https://somersetw.maps.arcgis.com/apps/MapJournal/index.html?appid=141a0f9ed2554f5687b938a23a13a5c0>) that provided a range of map data about the Severn Estuary, described in the Story Map as a "starting point" and a "Toolkit" that "will help everyone with an interest in the estuary to engage with decisions about its future and to understand its complex workings and inter-connections". The 2017 Vision document is somewhat dated.

The Delivering the Severn Vision project was funded through the Championing Coastal Coordination Partnership Grant and aimed to produce a workable framework with which to deliver the aims of the Severn Vision Report. This was finally published in April 2023 after submission of the Local Plan. The project was delivered through three coordinated workstreams that engaged with a wide range of stakeholders to consider the themes of the Severn Vision and develop recommended actions to

increase co-ordination and identify opportunities for climate adaptation and mitigation. Whilst many barriers to a coordinated holistic approach across the Bristol Channel and Severn were identified, stakeholders expressed their support for change and enthusiasm for a united approach to the restoration and enhancement of natural resources alongside a holistic and integrated governance model for the whole area. In terms of the HRA for the Stroud Local Plan, the maps in the additional evidence do not contain anything that affects or should influence the findings of the HRA. There is unfortunately no information available as to where the map data supplied have been sourced from and at what stage. Irrespective of this, the Habitat Regulations Process is a statutory procedure which follows a series of clearly defined steps. These relate to the conservation objectives and conservation status for a European site. The process is set out in paragraphs 1.3-1.29 of the HRA (EB85).

The maps that have been shared relate to:

- The distribution of habitats around Sharpness. Nothing within the Plan involves direct loss of habitat within any European site and loss of supporting habitat (outside the European site boundaries) is comprehensively covered in the appropriate assessment (Section 5).
- Carbon storage and commercial fishing, which are not relevant to the HRA.
- Low-lying land potentially vulnerable to tidal inundation. This map in parts relate to coastal squeeze. This is discussed in the HRA in paragraph 5.7 of the HRA (EB85) which discusses the shoreline management plan.

The Local Plan policies and proposed allocations are believed to comply the maps and findings provided. Natural England and the Environment Agency both support the Local Plan. They have been involved throughout the process as the Local Plan and evidence base progressed.

Reference was also made to the South West Marine Plan (June 2021) that provides a framework will shape and inform decisions over how the areas' waters are developed, protected and improved over the next 20 years. Through its vision for economic, environmental and social prosperity, the South West Marine Plan will ensure effective and sustainable use has been made of the space and resources available, whilst taking account of the areas' distinctive characteristics. Marine developments, such as offshore renewable energy, will contribute to the UK's commitment to reduce greenhouse gas emissions to net zero by 2050. The vision is to be achieved through its 13 objectives and marine plan policies, which have been developed in partnership with local and national organisations, representatives, and users of the area. The South West Marine Plan covers an area of around 84,000 square kilometres of inshore and offshore waters stretching from the Severn Estuary border with Wales and the River Dart, in Devon. The Marine Plan whilst having been finalised post submission of the Stroud District Local Plan, the Council consider there is no conflict with its emerging policies or the HRA recommendations. All help to enhance and protect the marine environment and help achieve sustainable economic growth while respecting local communities both within and adjacent to the marine plan areas The Marine Management Organisation (MMO) has been engaged in the Local Plan process and where they have not objected to the emerging Local Plan allocations or to the HRA evidence provided to date. There is nothing in the Local Plan that undermines the South West Marine Plan. Going forward the Council's Flooding and Land Drainage Engineer refers to the South West Marine Plan when giving advice to applicants and landowners on inshore matters.

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For completeness any future iteration of the HRA (e.g. to accompany any main modifications) could include reference to the Severn Vision Story Map as a source of additional background information about the estuary and reference be made to the South West Marine Plan.