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c/o Gloucestershire Wildlife Trust
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Registered charity number: 232580
Registered in England number: 708575

Case reference: TR010056

Interested party number: 200028970

Document reference: GWT comments on responses submitted at deadline 6

11/04/2022

Dear Sirs,

I am writing to provide Gloucestershire Wildlife Trust's (GWT) submission for deadline 7, which comments on submissions made at deadline 6 and outlines GWT's intended engagement with the scheme post-examination.

GWT welcomes the new commitments made to address some of the concerns it has raised. However, several proposed solutions during detailed design create a not inconsiderable ongoing demand for GWT's input. GWT recognised the importance of participating in scheme development before and during the DCO examination process. Since 2016 this has placed an increasing demand on GWT's charitable resources, costing tens of thousands of pounds in staff time.

With an ambitious new 2030 strategic plan now underway, GWT's must re-focus and cannot continue to provide the same level of in-kind contribution to the A417 scheme post DCO. Whilst GWT will continue to engage with the scheme, time contributions will be limited. Long-term participation in working groups or extensive review of detailed designs will require GWT's time costs to be compensated for.

Your Sincerely

[REDACTED]

Dr Gareth Parry

Director for Nature's Recovery

Gloucestershire Wildlife Trust

[REDACTED]

[REDACTED]

Table 1D7a		Gloucestershire Wildlife Trust comments on responses submitted at deadline 6	
Document reference	Section 2.3.4	Submission	GWT response at deadline 7a
8.2 National Highways Comments on Responses received by Deadline 5		National Highways provides its latest position on the matters raised by GWT in their Statement of Common Ground submitted at Deadline 5 (Appendix F to the Statement of Commonality) (Document Reference 7.3 (Rev 3), REP-005)	<p>A) GWT is satisfied that the request for a comprehensive map of compensatory habitat has been met. GWT notes that the applicant did not address the request to confirm how much land for compensatory habitat has been secured. This information is important to help address GWT's matter outstanding 3.1 on the Statement of Common Ground with National Highways, which relates to the likely success of the mitigation plan.</p> <p>B) GWT is pleased with amendments to secure long-term monitoring of compensatory habitat via the EMP, and that this will including remediation measures. GWT's retains the view that the assumption of 100% success is overly optimistic, and evidence has not been presented for road schemes achieving this.</p> <p>C) GWT welcomes the provision of further detail on the Governance procedure for the LEMP and the inclusion of trigger points and remediation measures. Whilst GWT would be interested in participating in a working group, as outlined in the cover letter this requires an ongoing commitment of in-kind charitable resource at a level that is not sustainable.</p> <p>D) GWT welcomes the amendments to requirement 11 and is satisfied that this safeguards the detailed design of the engineered structures that are critical to the ecological outcomes of the scheme.</p> <p>E) GWT maintains its position of disagreement with National Highways on the assessment and mitigation of increased recreational pressure on the Crickley Hill and Barrow Wake SSSI.</p>