



**Gloucestershire
Wildlife Trust**

Gloucestershire Wildlife Trust
Robinswood Hill Country Park
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Registered charity number: 232580
Registered in England number: 708575

19 November 2024

M5 junction 10 Improvements Scheme Application- Deadline 9- Comments on the RIES and responses to any associated questions

Gloucestershire Wildlife Trust are submitting further comments in relation to the Planning Inspectorate's Report on the Implications for European Sites (RIES).

Table 2.2 of the RIES refers to our previous comments regarding concerns that the proposed M5 junction 10 development would increase accessibility for recreational users to Coombe Hill SSSI, which is known to be functionally linked to the Severn Estuary SPA, SAC and Ramsar. As an intrinsic element of the Severn Estuary habitat mosaic, any potential harm to Coombe Hill could lead to harm to the SAC.

We disagree that the increase in recreational pressure will come solely from the increase in housing locally. The need for the project is not limited to supporting growth and new housing in and around Cheltenham but also to sustain the m5 corridor more widely. The addition of northbound and southbound slip roads will make it much easier, convenient and appealing to travel to the area from elsewhere. It can therefore be argued that the works will inevitably make Coombe Hill more accessible from longer distances.



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Over the past few years, we have had reports from regular local visitors to our Coombe Hill Canal and Meadows reserve that there has been an ongoing increase in visitor numbers. Despite the point raised by the applicant that parking limits visitors, a more consistent flow of visitors throughout the day and use of the site by minibuses, potentially for a greater number of organised groups (i.e. further increasing footfall in this way, rather than by private cars) is possible and likely. Dogs cause one of the biggest disturbances to the site, and dog walkers with one vehicle can walk several dogs at once. An increase in this activity could also have a large impact. This is something we are already seeing as a result of the increase in dog ownership in recent years. The combination of significant new local development, with potentially new dog walking businesses, and improved accessibility to Coombe Hill from this scheme, will likely add to this issue. As such, we still consider it an error for the application not to consider such impacts.

The application makes reference to mitigation being provided by local housing development, which the M5 junction 10 scheme will facilitate. The mitigation proposed for the West Cheltenham development includes the creation of a new SANG. This SANG will be an 'enhancement' in general terms, in adding/introducing new habitat, and may deter visitors from visiting the Cotswold Beechwoods, which is a further distance to travel, but is not mitigation for harm to the existing habitat at Coombe Hill.

The new SANG will be several kilometres from the West Cheltenham development. This is a similar distance to Coombe Hill but with a longer journey time. Coombe Hill will also be made even more accessible from West Cheltenham by the addition of the new link road which is part of the scheme. The SANG will have a very different appeal to the wetland landscape at Coombe Hill.

We therefore think it is highly unlikely that the creation of this new SANG will deter people from visiting, and we do not think this suggested mitigation will help to protect Coombe Hill, as per paragraph 180 (a) of the NPPF, nor does it comply with paragraph 186 (b). We have also raised these concerns in our response to application 23/01875/OUT in September 2024.

Feasible Coombe Hill mitigation

We consider the reserve to be at full capacity and have/ are putting infrastructure and interpretation measures in place to try and reduce ongoing recreational impact on the reserve itself. An effective way to prevent further harm at Coombe Hill through additional recreational pressure and risk a reduction to the estuary mosaic would be to create an area of publicly accessible land next to the car park end of the Coombe Hill reserve.





The site would have a good network of accessible surfaced paths, providing better walking conditions than those in the surrounding countryside. We feel that by creating such a feature right next to the nature reserve, people would use this (especially dog walkers) rather than walking in other parts of the reserve where more sensitive wildlife persists. A site of this size would provide enough of an outdoor experience to keep the majority of visitors happy, benefiting both people and wildlife.

An example of what this type of mitigation would cost is set out below. We would welcome further discussion around this but consider this to be the only way to truly protect and prevent further degradation of the Coombe Hill site, as a result of the improved accessibility that the M5 Junction 10 scheme will deliver in cumulation with the additional nearby development.

Item	Cost
5ha permanent pasture (Severn Vale)	£120k
Path work	£19k
Interpretation (3 boards x £3k)	£9k
Habitat improvements - reseedling, tree planting	£7k
Reserve management (£8k per year) X 3yrs	£24k
Legal fees	£5k

Kind Regards,
Laura Bates

Planning and Green Infrastructure Lead,
Gloucestershire Wildlife Trust

