

#### Severn Estuary Partnership Position Statement on Large Scale Infrastructure Projects

The Severn Estuary Partnership (SEP) is an independent and politically neutral partnership that brings together a diverse range of stakeholders, including but not limited to, local authorities, community groups, non-governmental organisations, regulatory government agencies, ports authorities and universities to promote and facilitate a sustainable approach to management, planning and development in the Severn Estuary.

This position paper has been developed in collaboration with members of the SEP Management Group and reflects the five key principles of <u>the Severn Estuary Strategy (2017 - 2027</u>). These principles are:

- Achieving a sustainable marine economy
- Ensuring a strong, healthy and just society
- Living within environmental limits
- Promoting good governance
- Using sound science responsibilities.

The Severn Estuary is the UK's second largest estuary and one of the UK's most important and unique natural and economic resources, renowned for its biodiversity, dynamic tidal range, and unique coastal and inter-tidal features. It is a designated European Marine site and supports internationally important and designated habitats and protected species, including extensive wetlands, intertidal habitat and a rich diversity of wildlife. Major river catchments including the Wye, Severn, Usk, and the Bristol Avon feed into and are part of the wider Severn Estuary catchment, connecting marine and freshwaters which is crucial for the lifecycles of migratory fish and other wildlife.

The estuary plays a vital role in regional and national economies through its ports, fisheries, and tourism. It also provides crucial ecosystem services, such as flood protection, carbon storage, and water quality regulation, making its sustainable management essential for ecological balance, climate resilience and human well-being. The Estuary also boasts a wealth of heritage, archaeological and geological designations and has an important sense of place value for its vast, diverse and culturally rich local communities and landscapes.

As a partnership, we are committed to the long-term health, resilience and prosperity of the Severn Estuary and its communities. This includes recognising the complexities associated with large-scale infrastructure projects. SEP therefore emphasises the importance of the following principles in decision making and the development of all large scale-infrastructure projects, and would expect to see these principles applied to ensure a consistent and integrated approach to planning is applied within the Severn Estuary region.

#### 1. Compliance with Development Consents and Safeguards

Consents and requirements made during the decision-making process for development are critical to balancing progress with environmental, community, and regulatory safeguards. SEP advocates for rigorous compliance with all consents and conditions, included in planning permissions, marine licences, and environmental permits, to protect the Estuary's ecological, geological, social, cultural, and economic resources and their value. Ensuring adherence to these commitments reinforces accountability and fosters trust among stakeholders. Where variations to conditions or consents are necessary, particularly those involving significant changes, SEP expects a transparent and comprehensive process of consultation and assessment to occur before any development proceeds.

#### 2. Consideration of Statutory Responsibilities

Full consideration must be given to <u>the internationally and nationally designated sites of the Severn Estuary</u>, which include its status as a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site, and Site of Special Scientific Interest (SSSI). These designations afford the estuary significant legal protection under the Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations), the Wildlife and Countryside Act 1981 (as amended), and the Ramsar Convention on Wetlands of International Importance.

Additionally, it is recommended that due consideration be given to Functionally Linked Land (FLL), which supports species associated with the designated sites, even if located beyond their formal boundaries. This is particularly relevant for species listed under Annex I of the Birds Directive (Directive 2009/147/EC) and those protected under Schedule 1 of the Wildlife and Countryside Act 1981. Any activities or developments in or near these areas must adhere to the precautionary principle, ensuring that adverse impacts on the ecological integrity of these sites and their associated species are avoided or mitigated.

# 3. Use of Best Available Data & Modelling

The Severn Estuary is a dynamic and complex environment and system, and decisions impacting it must be informed by appropriate, robust, up-to-date, and peer-reviewed scientific data. SEP stresses the need for the consistent, transparent, and accessible use of the best available evidence to inform mitigation, compensation, and monitoring for both construction and operations. As part of the assessment of individual projects, the combined and cumulative impacts of projects across the estuary and at specific locations over time also need to be taken into account. Ensuring the transparency and accessibility of evidence fosters accountability and inclusivity, while minimising risks and achieving sustainable outcomes for both the project and the Estuary. Projects should also use up-to-date and readily updatable modelling allowing for adaptability within one of the UK's most dynamic environments. Where data is currently limited, the precautionary approach should be applied to assess potential impacts on the estuary to inform decision making, and plans and commitments put in place to obtain relevant data.

# 4. Commitment to Long-Term Monitoring Pre and Post Project

The impacts of large-scale infrastructure projects on the Severn Estuary will change over time as projects develop and the estuary responds to external factors including climate change. To ensure that unforeseen effects and trends are identified and addressed promptly, SEP advocates for a commitment to comprehensive, long-term monitoring programmes informed by long term monitoring data sets. These programmes should be transparent and designed in consultation with relevant independent experts to track changes in environmental conditions including but not limited to water quality (chemical, particulate and sediment load), water temperature, water levels and flows, ecology (protected fish, birds, cetaceans, and other species), habitat condition and area, greenhouse gas emissions, and socio-economic factors.

# 5. Effective Engagement with Local Stakeholders and Communities – Communities at the Heart of Decision Making and Planning

Timely, targeted and well-framed stakeholder engagement should be at the start and heart of any project within the Severn Estuary, irrespective of scale. Communication should be both location specific and at catchment level, taking into account the wide range of local community groups, fora and partnerships, at local and catchment scale, ensuring that communication messaging and materials are relevant and sensitive to local issues.

Due to the diverse range of stakeholders, partners, and communities and the major tributory river catchments associated with the Severn Estuary, communities must be meaningfully engaged throughout the entire development cycle, with lessons learnt fully appreciated, and effective communication being a first, not final thought. SEP emphasises the importance of clear, transparent communication and regular consultation and dialogue, ensuring that the voices of local communities, partners, conservation groups, industry representatives, and other stakeholders

are heard and considered. Building trust through genuine dialogue is essential to fostering collaboration and addressing concerns to design and deliver projects which support outcomes across objectives.

As an independent partnership, SEP remains committed to providing a forum for balanced discussion and ensuring that diverse perspectives are respected and represented. We urge all parties involved in the development of large-scale infrastructure projects to act responsibly and collaboratively, prioritising the long-term health and sustainability of the Severn Estuary and its communities.

# 6. Recognition of Cross-Border Challenges and Opportunities

The Severn Estuary's unique position as a natural and economic resource spanning multiple administrative and national boundaries presents significant cross-border challenges that must be carefully addressed in large-scale infrastructure projects. Coordinating efforts between stakeholders in England and Wales, as well as aligning with international obligations, is essential to ensuring consistency in regulatory approaches, environmental protections, and socio-economic outcomes. Failure to adequately consider cross-border dynamics can lead to fragmented decision-making, environmental degradation, and missed opportunities for collaborative benefits. SEP advocates for an integrated approach that fosters cross-border dialogue, aligns legislative frameworks across different scales, and harmonises environmental and community safeguards to achieve truly sustainable development outcomes for the Estuary and its diverse communities. <u>Shoreline Management Plans</u> (SMPs) alongside the <u>Wales</u> and <u>South West</u> <u>Marine Plans</u> and River Catchment Plans provide examples of where strategic alignment with policies is essential to delivering effective cross-border working, programme implementation, monitoring and regulation.