

32 Reasons Why – #saynotosaltmarsh

1. Any potential salt marsh created in Kingston Seymour would quickly be eroded by variable, strong high tides from the Severn Estuary.
2. Land exposed to the Severn Estuary would immediately silt up (due to the high silt content) resulting in unattractive muddy, dangerous, unusable land.
3. These areas are likely to encourage highly invasive plant species such as *Spartina Anglica* and intertidal macroscopic alga *Enteromorpha* which has been linked to the death of horses.
4. These nutrient enriched areas risk blooming intertidal macroscopic alga *Enteromorpha*. This is likely to develop prolifically in the 'set back' area, which when rots, creates a pungent odour (hydrogen sulphide), the 'bad egg' smell.
5. Our current sea wall has protected us from flooding for many years and there is no justification to breach or 'realign' it without increasing flood risk. The Severn Estuary has the second highest tidal range in the world (at 14m) and this sea wall protects 45,000 houses across Kingston Seymour, Clevedon and surrounding areas. Any proposed changes would result in a major engineering project – with a lot at risk.
6. Placing new habitat creation above people's homes, farms, businesses, and livelihoods is unjust, inhumane and is strongly opposed by local politicians and the wider community.
7. Kingston Seymour is noted for its freshwater ditch and rhyne network (managed by the Internal Drainage Board) and associated invertebrate assemblage. Salt water would have a significant detrimental impact on this unique freshwater environment.
8. Freshwater fish cannot survive saltwater incursion so would be at risk. Kingston Seymour has three successful freshwater fishing lakes. These all rely on Kingston Seymour's unique freshwater rhyne and ditch network.
9. EDFs proposal seeks to destroy one wildlife habitat and its established flora and fauna to create another. The existing habitat is home to many endangered species, including Lapwing, Brown Hares, voles, great crested newts, rare birds, bats and rare invertebrates. These will all be lost if the proposal is approved.
10. Kingston Seymour has several SSSIs within the Severn Estuary which are protected by law, specifically, rare freshwater wildlife. This proposal is likely to have adverse impacts on the integrity on these sites.
11. Kingston Seymour is part of the Severn Estuary RAMSAR site, which is a wetland of international importance. This proposal is likely to have adverse impacts on the integrity on these sites.
12. Kingston Seymour is part of the Severn Estuary Special Protection Area (SPA) which are protected areas for birds under UK legislation. This proposal is likely to have adverse impacts on the integrity on these sites.
13. Given the significant value associated with our wildlife and internationally recognised environmental designations - it is clear that additional mitigation and offsetting will be required to ensure that proposed compensatory measures do not result in a net loss of existing biodiversity. Mitigation will be required for the mitigation.
14. Our historic landscape is ancient and unique. It will be lost and cannot be replaced, according to renowned Landscape Archaeologists.
15. The loss of 800 hectares of productive farmland threatens our food supply, food security, and the livelihood of intergenerational farmers. It will completely destroy the future of several young farmers.
16. Successful businesses and productive farms will be destroyed by this proposal and jobs, will be lost, following years of investment and hard work. This level of destruction is NOT proportionate to the habitat creation proposed.
17. The site is unsuitable for a salt marsh due to its proximity to key infrastructure e.g. a Solar Farm, Water Treatment Centre (sewage works for Clevedon), Internal Drainage Board System, the M5 Motorway and Bristol Airport (bird strike - the site is under key flight paths).
18. The Pier to Pier Way and the proposed Southwest Coastal Path would be negatively impacted by the proposal e.g. flood risk, closure for re-routing, passing through land which is rendered unusable and unattractive.
19. A significant area of our community (and amenity) will be lost to this proposal. This will have a negative impact on the fabric of what makes this community and its people a great place to live.
20. The local area is likely to experience high levels of mosquitos as a result of creating pools of stagnant water.

21. The scheme will significantly reduce the amount of rainwater storage in the rhynes and ditches, which during high tides will directly increase the flood risk of neighbouring houses.
22. Vehicular access to Kingston Seymour is less than ideal for such a large project. Construction traffic would need to travel through Clevedon and Yatton (past houses and schools) then onto narrow lanes which are heavily used by businesses and cyclists on the Pier to Pier.
23. EDFs proposal will take years to approve and then complete. This uncertainty (and disruption) will hang over us impacting our day to day lives and homes for years to come. People will be unable to get on with their lives.
24. This well-loved, biodiverse site has been chosen to offset non-related issues for Hinkley Point C. For EDF to be granted a compulsory purchase order they have to show that this is the only and best site that can meet their requirement. The evidence of that is extremely weak.
25. Alternative technical solutions to safety issues for an acoustic fish deterrent system should be considered by an independent panel.
26. The rationale behind the proposal appears deeply questionable in terms of how many fish would be 'offset' by these measures.
27. Other more suitable sites could be selected, without the high biodiversity or protections of Kingston Seymour. Avon Wildlife Trust have listed many projects in the vicinity which would welcome funding. Alternative options should be considered by EDF e.g. reclamation of land in the estuary as is the case in the creation of Slimbridge
28. The high volume of land to be consumed by this proposal seems excessive when compared to the net gain for fish in the Severn Estuary and is not in the public interest. There is no evidence that this site will actually breed any fish or the type of fish that will be destroyed by not installing the AFD.
29. More suitable biodiversity and/or fish renewal projects should be proposed by Conservation Organisations e.g. fisheries/nurseries in the Severn Estuary. Sites selected should preferably be in unpopulated areas.
30. EDF have not justified why there are no alternative solutions. They have not conducted a thorough assessment of alternatives which takes into account best available technology associated with design and maintenance of AFDs and other mitigation measures.
31. There is no evidence that the proposed compensatory measures will be sufficient to offset the predicted adverse effects - measures should be targeted at compensating for that precisely identified damage.
32. Since 2018, EDF have sought permission to remove the AFD, as part of this variation a package of compensatory measures was requested by EA which included creating 800 acres of saltmarsh. However, EA's policy for 'managed realignment' of sea defences for habitat creation (required to achieve EDFs salt marsh proposal) states that it 'should only be taken forward 'with the agreement of land and property owners and with input from the community'. Land and property owners and community are against these proposals and EDF would therefore have to rely on s172 compulsory acquisition powers to forcibly acquire land. These are already been applied to gain access private property for wildlife surveys - at the outrage of the community.

EDF cannot provide sufficient evidence and quantitative assessment to demonstrate that their proposed outcomes can be secured and delivered successfully. In addition, they have not considered the 'human impact' on people's homes, livelihoods and on the community.