

## Appendix N – Responses to 2011 Consultation

Liam Fox MP to Secretary of State

Dr Liam Fox's letter to the Secretary of State

1 June, 2011

Dear Caroline

### **Environment Agency Consultation: Managing Flood Risk in the Severn Estuary**

I am writing on behalf of my constituents in Kingston Seymour, a small and historic village on the edge of the Severn estuary which faces wholesale damage as a result of the EU habitats directive. If the current proposals are taken forward, then a large area of productive farmland, profitable tourism and potentially archaeological value will disappear. I have a number of grounds for objecting to what I regard as little more than environmental vandalism.

I would like to begin with the issue of process. There has been widespread criticism of the lack of consultation from the Environment Agency. Local people feel that they are being railroaded by a large bureaucracy and concerns have not ever been requested or considered. The environment agency maintains that these proposals were anticipated in the Severn Estuary Shoreline Management Plan (SMP). It is true that managed realignment was mentioned, but with reference to a very limited area of the defences which we knew were particularly vulnerable. However, there was nothing in the SMP to suggest that managed realignment was being contemplated on the scale now being proposed. One could also ask whether there was any discussion between the Environment Agency and either DEFRA or Natural England prior to the release of the consultation document. Natural England appears to be of the view that there should have been full consultation with landowners before the proposals were ever published.

I have a number of questions relating to the implementation of the directive itself. The question boils down to "why us"? Why was this site chosen and what criteria were used to determine the viability of other sites? How is this being applied in other EU countries? Specifically, how do countries such as the Netherlands, where so much of the land is reclaimed from the sea, comply with this Directive? How is the Directive reconciled with other EU legislation such as Human Rights? I would also like to know what precisely are the criteria of the

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compensatory habitat? In law, is it necessary to compensate within the designated same area (in this case the Severn estuary SPA) or can compensatory habitat be created in some other parts of the country?

Another concern relates to the potential archaeological value of the land, as Professor Stephen Rippon of the Department of Archaeology at the University of Exeter says in a letter to me:

"Reclaimed wetlands fringe many of our estuaries, and they are a remarkable record of human achievement. They are complex landscapes that have preserved within them evidence of changing technology and agricultural practices over many centuries, and as such should be valued and preserved. Unfortunately, many coastal wetlands have been destroyed or damaged: the Avonmouth Levels, for example, are increasingly being swallowed up by industrial development, and most of Fenland, in the east of England, is now a vast arable prairie. What is so special about the North Somerset Levels is that they are such a well preserved example of a traditionally drained and managed reclaimed wetland, and so it is quite shocking to see this proposal.

"The reclamation of the wetlands around Kingston Seymour must first have been embanked in the late Roman period. The area then appears to have been flooded in the post Roman period, before being reclaimed again in the early medieval period: this medieval reclamation is undocumented but must have taken place before 1066 as the Domesday Book records a large population and numerous plough teams at Kingston Seymour which would not have been located on a salt marsh. The earliest reclamations were oval shaped areas, one of which lies immediately to the west of Ham Farm, and would be destroyed by this proposal. Once again, 'Landscape, Community and Colonisation: the North Somerset Levels in the 1st and 2nd Millennium AD' outlines the history of medieval reclamation in this area.

"Overall, this proposal will lead to the loss of an extremely well preserved and important landscape that is of great archaeological and historical value."

I would be very interested to know how the EU rates archaeological value when implementing Directives of this nature.

The Rt Hon Mrs Caroline Spelman MP