
From: Gordon, Kevin
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To: Gordon, Kevin
Subject: EPR Appeal Hinkley Point 3rd Party Reps L Dalton

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To: ETC <ETC@planninginspectorate.gov.uk>
Subject: Permit application number EPR/HP3228XT/V004

The The Habitats Regulations ensure protection of the environment by requiring decision makers, to assess the impacts of their proposed decisions on designated habitats and species. The original proposals gave some protection, but its removal, without additional mitigation measures, is unlikely to meet the requirements of the Habitats Regulations to ensure protection of the environment. Thus requiring decision makers, to assess the impacts of their proposed decisions on designated habitats and species.

Noting that:

Estuaries are complex systems that are comprised of subtidal, intertidal and terrestrial habitats, all interconnected and interdependent.

The Severn Estuary hosts some of the most important and protected habitats in the UK, with its vast tidal range playing a major role in creating the unusual physical conditions of the Estuary. The tidal characteristics not only influence the type and distribution of habitats but also affect the biological productivity of the Estuary. Whilst the Estuary is biologically poor compared with other UK estuaries, its unique set of physical characteristics still create a highly dynamic environment and support a wide range of communities.

The intertidal zone of mudflats, sandbanks, rocky platforms and saltmarsh is one of the largest in the UK and the Estuary's habitats support internationally important numbers of waterfowl, and large numbers of aquatic invertebrate populations. The Estuary also provides a valuable corridor for migratory fish and acts as a key nursery area for many species (see section on Fish).

Noting Also

In the UK, the Severn Estuary contains the largest aggregation of saltmarsh habitat in the south and southwest. It covers about 1,400 ha, representing 4% of the total area of saltmarsh in the UK¹. Saltmarsh environments fringe the coastline and can be found at locations such as Andrew's Pant, near East Aberthaw (Vale of Glamorgan pictured above), and Clevedon Pill. Saltmarshes develop where halophytes (plants which are more tolerant to saline conditions than conventional plants) colonise soft intertidal sediments, in areas protected from strong wave action. These halophytes provide important feeding areas for waterfowl.

Saltmarsh habitats are notable for their significance in supporting nationally and internationally important species and are frequently visited by numerous Species of European Conservation Concern (SPEC species), such as the Redshank, and Shelduck (see section on Birds). They also support an array of nationally important rare plant species, including the Bullbous foxtail, and the Slender hare's-ear (see Fig. 2).



The upper saltmarsh in particular makes an ideal water roosting site, and provides a refuge from the tides that flood the mudflats twice a day. Saltmarshes also support extensive networks of freshwater and brackish drainage ditches, which in turn provide habitats sustaining a vast array of plant species, aquatic invertebrates, and small mammals such as water voles. The Estuary's saltmarshes are of international importance, due to their dependence upon a narrow range of environmental conditions, and as such are designated as an **Annex 1 Habitat**² and a **Biodiversity Action Plan (BAP) Priority Habitat**³ (see Box 1 and 2 respectively). In addition to their enormous conservation value, they provide some shoreline protection, acting as soft sea defences, absorbing energy and helping to reduce the risk of coastal erosion and flooding. They also play an important role in the recycling of nutrients through the Estuarine system.

Given this the proposals to loosen the protection would damage the whole Severn Estuary, which is too valuable to the UK's natural environment to be put at risk. The proposals would undoubtedly do this

L.Dalton



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