



West of England Nature Partnership
Joining up the dots for nature

Bristol Avon
Catchment
Partnership

Mr Kevin Gordon
Environment Appeals Administration
The Planning Inspectorate
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Bristol, BS1 6PN
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26th October 2020

Dear Mr Gordon,

Re: Hinkley Point C – Screening for Cooling Water Intake – Permit: EPR/HP322 8XT/V004

We refer to the appeal by NNB Genco on its application to vary its permit to remove an important protection measure which is required by the current permit; NNB Genco are seeking to remove the requirement for an acoustic fish deterrent (AFD) at its cooling water intake pipes in the Bristol Channel. The purpose of the AFD is to reduce the number of fish drawn into (and killed in) Hinkley Point C's cooling water system.

We are writing on behalf of the Bristol Avon Catchment Partnership (BACP) and the West of England Nature Partnership (WENP). The BACP comprises a range of organisations, groups, authorities¹ and individuals dedicated to working together to improve the water environment and provide wider benefits for people and nature at a catchment scale – known as a [Catchment Based Approach](#) (CaBA). Formed in 2012 with support of central government, the partnership has produced a [Catchment Plan](#) to work towards achieving a better water environment for all. [WENP](#), the designated Local Nature Partnership for the West of England, is a cross-sector partnership working to restore the natural environment in the West of England by embedding the value of nature in decision making across spatial planning, public health and economic development. The BACP and WENP are concerned about potential impacts on fish migrating into and out of the Bristol Avon and coastal streams in the vicinity.

The Bristol Avon is a significant river flowing into the Severn Estuary at Avonmouth. The Severn Estuary and the wider Bristol Channel have several designations for their conservation value, e.g. Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar Site and Sites of Special Scientific Interest (SSSI). Fisheries and environmental consultants have reported on the necessity of including the AFD, as part of the most suitable screening at the new cooling water intakes to protect all fish species in line with the range of protective environmental laws. The Environment Agency issued the permit with AFD as part of the required screening approach. The long-term data set associated with the current trash screen at Hinkley (B) highlights significant fish mortality and Hinkley Point C is likely to have a greater impact due to its design and volume of water intake. We are aware that fisheries scientists working for NNB Genco have

¹ Due to their regulatory roles in relation to the AFD, the Environment Agency and Natural England (standing members of the Partnership) are not party to this letter.



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a different view on the impact of the Hinkley C intakes and the need for AFD. Where there is no consensus between respective fisheries scientists, and when considering sensitive fish species in a highly designated area, we would urge that due weight is given to the precautionary principle.

In NNB Genco's Statement of Case, section 3.1.1, they make the following statement – "*further work since the granting of the Hinkley Point C DCO has shown that an efficient AFD is extremely difficult to design, and would be very challenging to construct and maintain in the specific environmental conditions of the Severn Estuary*". We question whether energy production should be considered within the Severn Estuary and its surrounds unless appropriate technology is utilised to protect all forms of the environment. No energy production system can claim to be applying truly an 'environmentally appropriate technology' if it also kills vulnerable species and operates against a range of environmental protection measures in what is one of the most heavily designated conservation areas in the United Kingdom.

We are in a biodiversity crisis as well as a climate crisis – the protection of one should not impact on the other. Just because something is difficult, and potentially costly, for NNB Genco, does not mean it should not be put in place to avoid a biodiversity loss being caused. Biodiversity Net Gain in relation to development is a key principle in the Government's 25 Year Environment Plan. That principle of 'net gain', and certainly not 'net loss', should be paramount in such a sensitive location.

The likely impact of removal of the AFD on fish will greatly undermine conservation work being undertaken across the Bristol Channel region to protect fish stocks, in both the marine and freshwater environments. As a prime example, in the Bristol Avon, there are currently improvements planned to the radial gates on the River Avon at Twerton and Pulteney Weir, incorporating enhancements for fish passage. There are also weir assessments and habitat improvements taking place on other tributaries across the catchment, including the River Frome (Bristol) and River Chew.

All of the partnership projects being developed and delivered through the BACP are aimed at improving the ecological performance of the rivers within the catchment, thus having a direct benefit for the fish populations. Ultimately, all of the projects are underpinned and influenced by the performance of the fish populations. Project partners are working together and seeking funding opportunities to carry on improving the ecological status of the rivers whilst delivering multiple-benefit outcomes.

We, therefore, ask the Planning Inspectorate to take into account our serious concerns, and to ensure that the protection of the fish species in this sensitive environment is not compromised by NNB Genco's desire to dilute the screening measures at this late stage.

Yours sincerely,

Dr. Richard Cresswell MBE
Chair, Bristol Avon Catchment Partnership

Professor Selena Gray MD, FRCP, FFPH
Chair, West of England Nature Partnership