
From: ETC <ETC@planninginspectorate.gov.uk>
Sent: 19 November 2020 07:28
To: Gordon, Kevin
Subject: EPR Appeal Hinkley Point Bristol Avon Rivers Trust
Attachments: HPC Planning Inspectorate Letter EPRHP3228XTV004 - BART.pdf

Sent: 27 October 2020 10:53
To: ETC <ETC@planninginspectorate.gov.uk>
Cc:
Subject: HPC Planning Inspectorate Letter EPRHP3228XTV004 - Bristol Avon Rivers Trust

Dear Mr Gordon,

I am writing on behalf of the Bristol Avon Rivers Trust (BART) to 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. The likely impact of removal of the AFD on fish will greatly undermine conservation work undertaken across the Bristol Channel region to protect fisheries stocks, in both the marine and freshwater environments.

Therefore, we ask the Planning Inspectorate to take note of our serious concerns as outlined in the HPC Planning Inspectorate Letter (attached), 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.

Kind regards,
Simon

Simon Hunter BSc(Hons), MPhil
Head of Operations
Bristol Avon Rivers Trust

Website: www.bristolavonriverstrust.org/

We are on Twitter @bristolavonrt and Facebook and LinkedIn as 'Bristol Avon Rivers Trust'.



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DPC:76616c646f72





Mr. Kevin Gordon
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BS1 6PN
by-e-mail: ETC@planninginspectorate.gov.uk
cc: Environment Agency – Wessex North

27th October 2020

**Reference: Hinkley Point C - Screening for Cooling Water Intake - Permit:
EPR/HP3228XT/V004**

Dear Mr Gordon,

I 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.

I am writing on behalf of the Bristol Avon Rivers Trust (BART). BART is an independent environmental charity dedicated to the protection of the Bristol Avon and its tributaries to ensure a sustainable and thriving environment. We are a science and evidence led organisation considering a catchment scale approach and our remit covers all rivers that flow into the Bristol Avon and ultimately the Severn Estuary. BART is 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 the required screening approach. The long-term data set associated with the current trash screen at Hinckley (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 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 Seven Estuary*". The BACP questions 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 the 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 happen. Biodiversity Net Gain in relation to development is a key principle in the Government's 25 Year Environment Plan; that principle should not be lost, particularly in such a sensitive location.

The likely impact of removal of the AFD on fish will greatly undermine conservation work undertaken across the Bristol Channel region to protect fisheries stocks, in both the marine and freshwater environments. As a prime example, in the Bristol Avon there are currently two improvements planned on the main River Avon in Bath to the Radial Gates at Twerton and Pulteney Weir to incorporate improvements for fish passage. There are also assessments and improvements to weirs on many of the tributaries across the catchment, including the River Frome (Bristol), River Chew and River Marden to improve fish passage. Many other tributaries across the catchment have delivered river restoration projects to improve fish habitats, helping to increase spawning grounds. Funding to deliver these assessments and river improvements has been sought from a wide range of partners, including the Local Authorities, highlighting the collective need and support to improve our waterways for fish migration and provide suitable in-river habitats.

We, therefore, ask the Planning Inspectorate to take note of 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,

A handwritten signature in black ink, appearing to read "Simon Hunter", written over a white background.

Simon Hunter

Head of Operations
Bristol Avon Rivers Trust
simon@bristolavonriverstrust.org

