



BRISTOL NATURALISTS' SOCIETY

Founded 1862

Registered Charity No. 235494

www.bristolnats.org.uk

Hon. Secretary: Lesley Cox. E-mail,
secretary@bristolnats.org.uk



27th October 2020

Dear Mr Gordon,

Re: EPR/HP3228XT/V004 and the Appeal to Vary the Agreed Condition of Fitting of AFD's by NNB (HPC)

Firstly, I would like to make it clear on behalf of the Society that we are not a campaigning organisation.

The Society bases itself on the scientific process and seeks to understand our local geology, flora and fauna and the processes of change with regard to natural history, for example, the various changing practices of the modern world and the effects those practices have in the Anthropocene Era on our natural capital, including climate change and agricultural intensification. The Society records and monitors local populations of species with regard to their decline or improvement.

However, we must make comment on the tragedy that is about to unfold in the Bristol Channel/Severn Estuary if NNB (HPC) are permitted to get away with breaking the promises and commitments the Company made when applying for permission to build Hinkley Point C.

- a. Firstly, the Company has 'jumped the gun' and assumed that the Environment Agency would refuse permission to vary whilst the EA was still considering the evidence and the Company has applied to the Planning Inspectorate to override the EA's decision that it has not yet made.
- b. It has become standard practice for 'developers' to make commitments and then apply to vary them. This is effectively a licence to by-pass the environmental laws which are already too lax.

At a time when the world is facing an unprecedented ecological emergency which includes our dying oceans, the Bristol Channel (Area VIIf) provides an important nursery which enables some degree of recovery for many species.

The UK is one of the most depleted in terms of its biodiversity.

The tidal range in the Bristol Channel/Severn Estuary results in the estuary having one of the most extensive intertidal wildlife habitats in the UK, comprising mudflats, sandflats, rocky platforms and islands. These form a basis for a varied and biodiverse flora and fauna typical of extreme physical conditions.

If NNB (HPC) are given clearance for the absence of AFD's, thousands of tons of fish will be sucked into the cooling system over the course of the year – and each and every year. Some of these will be protected species and some will be IUCN listed as Near Threatened or Critically Endangered species, for example, Glass Eels, Angel Sharks, many forms of Ray and the Twaite Shad

The resultant fish soup will be discharged into the Bristol Channel/Severn Estuary causing eutrophication of the area which will have an adverse effect on its overall well-being. In addition, other species will be returned to the Bristol Channel/Severn Estuary in an injured state which could mean predation or death as a result of injuries sustained.

The Bristol Channel/Severn Estuary is recognised as:



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- a. A wetland area of International importance under the EC Directive and designated as a Ramsar Site.
- b. It is also recognised as a Special Protection Area (SPA) under the EC Directive on the Conservation of Wild Birds.
- c. It is also recognised as a Special Area of Conservation (SAC) under the EU Habitats Directive.
- d. The Severn Estuary is also a SSSI in part, within the former County of Avon, Gloucestershire and Somerset in England and Gwent and South Glamorgan in Wales.
- e. Whilst Britain has left the EU, do we really want to sacrifice our biodiversity just so a lazy company can save a lot of money?

If the company, NNB (HPC), has misjudged this factor of siting AFD's to protect fish stocks to the extent that it claims it has, its planning has been clearly flawed and the question has to be asked, what else has the company got wrong within the planning process? How safe will Hinkley Point C be? Has it taken in to account rising sea levels, for example. What other disasters will befall, following is commissioning?

We therefore request that the Environmental Laws of Britain are upheld and permission to vary the original planning conditions is denied.

Yours sincerely,
Lesley Cox
(Hon. Sec. Bristol Naturalists' Society)

Mr. Kevin Gordon,
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