
From: Gordon, Kevin
Sent: 17 November 2020 11:55
To: Gordon, Kevin
Subject: EPR Appeal Hinkley Point 3rd Party Reps Chris Wilson

Sent: 25 October 2020 17:05
To: ETC <ETC@planninginspectorate.gov.uk>
Subject: Inquiry on permit EPR/HP3228XT/V004: NNB Generation Company (HPC) Limited

FAO Kevin Gordon

Dear Sirs,

Re: Application from NNB Generation Company (HPC) Limited (NNB) to vary an environmental permit for Hinkley Point C Power Station

I wish to register my representation regarding the appeal made by NNB to the Secretary of State.

The UK is one of the most biodiversity depleted countries in the world so anything that affects our ability to restore the natural world needs to be treated with utmost caution. This is even more so if one is considering something, as in this instance, that will deplete biodiversity further.

There appears to be two issues here. The first is NNB's attempt to renege on an agreement already made when this licence was originally granted in 2013. The second is that we are now 7 years after the original licence was granted and a lot has happened since then so now would be a good opportunity to totally reassess the granting of this licence considering current circumstances.

It is clear, when the licence was originally granted, that the AFD system was deemed essential to minimise the huge impact that the cooling water intake pipes would have on the marine environment. Indeed, it was a condition of the licence that the AFD would be installed. I have no faith in NNB's contention that this material change is about diver safety- after all they are no doubt going to have to send divers down to inspect the pipes anyway. It can only really be about money and we cannot, as a nation, keep prioritising commercial interests over destruction of our environment. NNB's chosen method of cooling the proposed nuclear power station is clearly not environmentally acceptable so they need to go back to the drawing board or stop the project now. Perhaps, they need to look at the installation of cooling towers? If the Environment Agency allows the variation to this licence, it is signalling that they are not able or willing to protect the environment. If the Secretary of State allows this variation, then it drives a cart and horses through the Governments statements about protecting the environment, the 25-year environment plan and claims that they wish to increase biodiversity.

To the above I would add, that if NNB need to make such a major change after years of pre-application consultation and planning and years after starting this project, what other aspects of HPC have not been fully thought through and what are the other areas where they will be looking to cut corners during construction or, potentially, operation of this nuclear facility?

Since the licence was first granted in 2013 the area affected has been designated as a Marine Protection Area which underpins its importance to preserving biodiversity. This application to vary the licence, provides the opportunity to have a public enquiry into the licencing of the cooling system as it will have adverse impacts on European Protected Species such as European Eels, Alis Shad, River and Sea Lamprey and Twaite as well as more common species that are part of the important food chain for marine and land-based mammals and birds. It has recently been made public that mud and sediment in the area where the pipes will be installed, and other works undertaken, is likely to contain radioactive particles and heavy metals including alpha emitting particles so this must call into question the environmental and health impacts of disturbing the sea bed.

In conclusion, I believe that the variation to the licence should not be granted and request that the damage that this project will have on the marine environment should be the subject of a public enquiry.

I am happy for my representation to made public.

Yours faithfully,

Christopher Wilson,