
From: Gordon, Kevin
Sent: 18 November 2020 07:21
To: Gordon, Kevin
Subject: EPR Appeal Hinkley Point 3rd Party Reps Dr Jill Sutcliffe

Sent: 25 October 2020 09:49

To: ETC <ETC@planninginspectorate.gov.uk>

Subject: Inquiry on permitEPR/HP3228XT/V004: NNBGeneration Company (HPC) Limited

I wish to make representations at a Public Inquiry concerning the importance of the site wildlife designations, fish and ecosystems in the River Severn given the proposal to take mud from Hinkley Point offshore and dump it off Wales. I have standing with regard to the issue having run the Objectors' office at the Hinkley Point Public Inquiry and submitted my own objection to the application and qualifications in radioactivity and the environment.

- Firstly, the previous dumping needs to be assessed and evaluated
- Secondly, the procedures adopted need to conform with laws and policy in the marine environment to include OSPAR
- Thirdly, the process, as it involves the environment, needs to be subject to public consultation (Aarhus Convention, 1998)

Many will recall the dumping in the 1950s of material from the nuclear power station formerly called Windscale. This included Plutonium and the argument was that this would "disperse" in the environment. The radionuclides were deposited on the saltmarshes, and, when these dried out, the radionuclides were blown onshore as demonstrated by Dr Derek Branford then at Edinburgh University and reported in research carried out by Patrick Nelis, 1990. In his document he proposed that the sea spray transfer is an important pathway of discharged radioactivity into the human environment. The Sea-to-Land Transfer Model developed in the course of this study has been shown to be successful in simulating the reduction in radionuclide air concentration with distance inland from the Cumbrian coastline. It also closely fits other published data on the reduction in radionuclide concentration inland in coastal vegetation and soil

The terms of the Inquiry should be wide, to allow scrapping of the licence to be fully considered, because any feasible fish diversion measures could potentially not meet the Habitats Regulations.

Further grounds for scrapping include

- the new international status of the area as a Marine Protection Area.
- the nuclear contaminants that would be disturbed in construction
- the killing of European Protected Species (EPS) sucked in with the abstracted water

The killing of EPS is forbidden under the Conservation of Habitats & Species law, when there is an alternative. There is an alternative - to build a cooling system on the Hinkley Point site, using air-cooling or evaporative cooling towers.

The company is currently test boring in Bridgewater Bay to extract cores to test for contaminants. This is preparatory to applying to take out about a million tonnes – they have no permits yet for this and it is being strongly opposed on both sides of the Severn Estuary.

Thank you for your consideration.

Yours sincerely,

Jill

Jill Sutcliffe, Dr



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