



Mr. Kevin Gordon
Environment Appeals Administration
The Planning Inspectorate
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by-e-mail: ETC@planninginspectorate.gov.uk
cc: Environment Agency – West Midlands

16th 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; that being 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) the cooling water system.

The Severn Rivers Trust (SRT) is an independent environmental charity dedicated to the protection of the River Severn 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 River Severn and ultimately the Severn Estuary.

The Severn Estuary and the wider Bristol Channel has several designations for their conservation value, e.g. Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar Site, Site of Special Scientific Interest (SSSI), the Water Framework Directive (WFD) and European Marine Site (EMS). In addition, certain species are also protected including twaite shad, river lamprey and sea lamprey within the Severn Estuary SAC designation under the Habitats Directive and European eels under the European Eel Regulations. The region is home to a multitude of marine species, and also provides a vital migration pathway for designated or endangered species such as the allis and twaite shads, lamprey species, Atlantic salmon and European eel. These vital habitats are connected and any development in the Severn Estuary directly influence conservation efforts in our rivers.

Fisheries and environmental consultants have reported on the necessity of a three-pronged approach, including the AFD, as the most suitable screening at the new cooling water intakes to protect all fish species in line with the range of protective environmental laws. This has led the Environment Agency to issue the permit with AFD as the required screening

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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 greater impact due to its design and volume of water intake.

In NNB Genco's Statement of Case, Section 3.11, 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*". The Severn Rivers Trust feel that no energy production should be considered within the Severn Estuary and its surrounds in any form unless all appropriate technology is utilised to protect the environment in all its forms. No energy production can be 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 for NNB Genco, does not mean it should not take place.

The likely impact of removal the AFD on fish will greatly undermine conservation work being undertaken across the Bristol Channel region to protect fisheries stocks, in both the marine and freshwater environments. As a prime example, the Severn Rivers Trust is part of a partnership working on the rivers Severn and Teme (SSSI) to ensure that the Severn Estuary SAC designation can meet favourable conservation status under the Habitats Directive. Beginning in the 2016, the Unlocking the Severn project is opening 158 miles of fresh water to migratory fish species that are designated in the Estuary. The project is due for completion in 2021 and for the first time in 160 years allis shad, twaite shad, river lamprey, sea lamprey, European eel and Atlantic salmon will have open access to the entire length of their historic range within the main River Severn. This work will be completely undone if the populations of these important species, notably shad, are further affected within the estuary on their migration to the Severn.

Therefore, we urge the Planning Inspectorate, in the strongest terms, to ensure that the permit determined by the Environment Agency is not varied, either through the variation or public enquiry processes.

Yours Sincerely,



Mike Morris, Chief Executive Officer