



Mr K Gordon
Environment Appeals Administration
The Planning Inspectorate
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Email: ETC@planninginspectorate.gov.uk

26th October 2020

Dear Mr Gordon,

Re: Hinkley Point C – Screening for Cooling Water Intake – Permit: EPR/HP322 8XT/V004

I refer to the appeal by NNB Genco on its application to vary its Water Discharge Activity (WDA) permit to remove an important protection measure 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 at Hinkley Point C nuclear power station in Somerset. The purpose of the AFD is to reduce the number of fish drawn into (and mostly killed within) Hinkley Point C's cooling water system.

Somerset Wildlife Trust is one of 46 Wildlife Trusts working across the UK. We are a science-led movement focused on restoring habitats to support a wide range of wildlife and natural processes that are essential for healthy landscapes and provide vital services such as clean air and water, food, carbon absorption and flood alleviation. With the invaluable support of volunteers, and over 20,000 members, we manage 1700 hectares of land for wildlife and people in Somerset. We also work with other organisations and landowners to protect and connect wildlife sites across the county and inspire local communities and young people to care for wildlife where they live.

The Severn Estuary and its river systems are one of the largest and most important connected wetland habitats in Europe. The estuary has multiple designations of significant conservation value, including; Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar Site and Sites of Special Scientific Interest (SSSI). Over 100 species of fish have been recorded in the estuary, amongst the highest of any estuary in the UK, including the critically endangered European eel. Fisheries and environmental consultants have reported on the need to include the AFD, as part of the most suitable screening at the new cooling water intakes. Whilst there are still questions around the wider impact of using a direct cooling system on the marine environment, we felt the inclusion of AFDs suggested good intent on NNB Genco's part in terms of specifically mitigating some of the future impact on fish populations.

We therefore concur with the recent statement given by the Environment Agency;

"While we had not made a final decision on the application to remove the AFD, our provisional conclusion was that its removal, without additional mitigation measures, is unlikely to meet the requirements of the Habitats Regulations".

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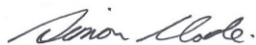
We are therefore very concerned by NNB Genco's application to the planning inspectorate for a variation in order to remove the AFD's - particularly when construction work is as advanced as it is.

We are currently in both a climate change and a biodiversity crisis. These are interlinked, and it's vital that any new energy production system use technology that does not impact negatively on already threatened species and habitats.

The removal of the AFD will greatly undermine vital conservation work undertaken across the Severn Estuary and likely have a significant impact on important fisheries stocks, in both marine and freshwater systems. We will therefore continue to support, and work, with other environmental partners and NNB Genco to clarify the situation and to reach a solution that is in the best interests of this precious marine ecosystem.

We, therefore, ask the Planning Inspectorate to take into account our serious concerns, and to ensure that the protection of the fish species in this sensitive, and highly designated, environment is not compromised by NNB Genco's desire to remove necessary mitigation measures.

Yours sincerely,



Simon Clarke
Head of Conservation Policy and Biodiversity

