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cc [Environment Agency Wessex Area](#)

9 October 2020

Dear Mr. Gordon,

**Hinkley Point C: Screening for Cooling Water Intake - Permit: EPR/HP3228XT/V004**

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 [Sustainable Eel Group](#) (SEG) is the leading international organisation (originating in the UK), working to accelerate the recovery of the endangered European eel across its natural range.

As you will know, Bristol Channel has several designations for its conservation value, eg. Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar Site, Site of Special Scientific Interest (SSSI) and European Marine Site (EMS).

It is home to a multitude of marine species, and also a migration pathway for designated species such as the Allis and Twaite Shads, Atlantic Salmon and European eel. In fact, the Severn estuary probably sees more of each of those vulnerable species than any other estuary in England and Wales. Between 50 and 100 million baby eels enter the estuary every year – mostly from January to April.

It is protected by a range of environmental legislation, the Habitats Directive and the Water Framework Directive to name but two.

Fisheries and environmental consultants have reported on the necessity of adequate screening at the new cooling water intakes to protect those species and others in line with the range of protective environmental laws. This has led the Environment Agency to issue the permit with effective screening.

The current Hinkley (B) trash screens at the end of their cooling water intakes provide a morbid ability to monitor fish stocks in the Severn estuary and a snapshot of what it kills each year. Low carbon energy cannot be considered to be good for the planet if it also kills vulnerable species. It would be a sorry indictment if a 21<sup>st</sup> century power generation system would be permitted to operate against a range of environmental protection measures in what is one of the most heavily designated conservation sites in the UK.

So, 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,

**Andrew Kerr**  
Chairman