



Kevin Gordon  
Environment Appeals Administration  
The Planning Inspectorate  
3A Eagle Wing  
Temple Quay House  
2 The Square  
Bristol. BS1 6PN  
by-e-mail: [ETC@planninginspectorate.gov.uk](mailto:ETC@planninginspectorate.gov.uk)  
cc: [Environment Agency Wessex Area](#)

15<sup>th</sup> 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 Westcountry Rivers Trust (WRT) is a 25-year-old environmental charity dedicated to the sustainable restoration of the rivers in Westcountry. We are a science and evidence led organisation considering a catchment scale approach and our remit covers many of the watercourse that flow into the Severn estuary.

The 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. It is protected by a range of environmental legislation, the Habitats Directive and the Water Framework Directive to name but two. 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 AFD as the most suitable 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 AFD as the required screening approach. The current trash screen at Hinkley (B) exhibit a long standing data set of fish mortality and considering this, the WRT feel that low carbon energy cannot be considered to be truly an environmentally appropriate technology if it also kills vulnerable species and also operates against a range of environmental protection measures in what is one of the most heavily designated conservation areas in the UK.

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,

Laurence Couldrick  
Chief Executive officer  
Westcountry Rivers Trust

**Westcountry Rivers Trust**

+44 (0)1579 372 140 | [info@wrt.org.uk](mailto:info@wrt.org.uk) | [wrt.org.uk](http://wrt.org.uk)

Registered Office Rain-Charm House | Kyl Cober Parc | Stoke Climsland | Callington | Cornwall PL17 8PH | UK  
Registered in England and Wales Charity No. 1135007 | Company No. 06545646