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cc [Environment Agency Wessex Area](http://www.environment-agency.gov.uk)

www.ifm.org.uk

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 IFM is the independent professional body representing fisheries professionals in the UK and Ireland. It is dedicated to the advancement of sustainable fisheries management.

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.

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 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.

The current Hinkley (B) trash screens at the end of their cooling water intakes provide the 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 of the UK planning system if a 21st 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 areas 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,



David Bunt
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