

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Application number: EPR/HP3228XT/V004

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 15 February 2019.

Send the information to either the email or ShareFile site below by the 24th May 2019. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email to: [REDACTED] (please note 10MB file size limit)

or

Upload to: <https://ea.sharefile.com/f/fo4e1382-6ffd-4f00-88be-f3be8f83a3a4>

Name	Date
[REDACTED]	16/04/2019

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Schedule

- I. The effect of not fitting an AFD system at HPC on the operation of the HPC FRR systems (TR493), report prepared by Cefas for NNB GenCo, February 2019. As reference in the Water Discharge Activity Environmental Permit Variation Application for Acoustic Fish Deterrent Removal (NNB-308-REP-000721).

The effects of not fitting an Acoustic Fish Deterrent (AFD) system are a key consideration within the permit application determination. Therefore this document is expected to include information that is key to our consideration of the permit application that currently has not been provided.

What is the issue?

The abundance of fish entering the intakes and passing through the cooling water system (CWS) and Fish recovery and return (FRR) system, will potentially increase under the proposed scenario.

How will the performance of those systems be impacted and is there any impact on the wider cooling system that could lead to changes in the characteristics of the resulting discharge? What effect will this have on the survival of species expected to travel through the FRR system? It is assumed that delicate fish (sprat and herring in particular) will die within the system at the band and drum screen stage. Shoaling fish such as these will create peak periods of 'debris', increasing the risk of smothering biota that would have otherwise survived. For the original Habitats Regulations Assessment there was an assessment of debris at periods of normal, peak and exceptional amounts, and how these could impact on the fish in the gutter system.

Little information is currently provided on the impact of additional fish impinged in the absence of AFD system on the survival of fish in the CWS and FRR system.

What is the impact?

We do not fully understand at this stage what the possible 'knock on effects' of removing the AFD system could be on the CWS and FRR system. Removal of the AFD system could potentially inhibit the function of these systems. It is not known if this presents a significant increased risk of smothering of fish that are targeted for recovery, therefore an additional impact of removing the AFD system are not fully considered.

What is the solution?

Fully describe the expected impacts on the effectiveness of the cooling water system due to increased biota impingement levels, evidencing any justifications. This should include the whole FRR system, not just on the screens, and consideration of any effects on the characteristics of the final discharge(s). We would want to see a review of peak debris periods, to check if the addition of dead fish would create exceptional levels beyond those previously demonstrated. Provide confirmation and justification to show that any 'knock on effects' of removing the AFD system from the design on the functionality of the whole CWS & FRR system have been considered.