Institute of Fisheries Management

Submission to the Hinkley C Planning Enquiry Appeal, 8 June 2021

Hello, my name is David Bunt. To give you some credentials: I have been Managing Director of an Environmental Consultancy (*1) since 2016. I am Chairman of the Institute of Fisheries Management (*2) – the UK's professional body for fisheries managers, and I am also Director of Conservations for the Sustainable Eel Group (*3) – a leading European conservation organisation seeking to reverse the decline of the European eel. Previously I held a number of positions, over 30 years, in fisheries and environmental management with the Environment Agency and its predecessor, the National Rivers Authority. I hold a BSc. in Environmental Biology and MSc. in Aquatic Resource Management; I am a Chartered Environmentalist, and a Fellow of the Institute of Fisheries Management.

I am not going to seek to provide complicated scientific evidence in support of this submission. We will hear that I am sure from better qualified and informed colleagues such as the Devon and Severn IFCA, Charles Crundwell of the Environment Agency, Steve Colclough of the Severn Estuary Interests and Andy Turnpenny of Fish Guidance Systems. I am just going to present a few facts and common sense in support of this submission.

The Severn Estuary is home to one of the most important and diverse array of fish populations in the British Isles, and it has numerous conservation designations as result. Those designations are too many to list, but they include being a RAMSAR site and a Special Area of Conservation.

It is home, a nursery area or a migratory route for a wide diversity of over 100 fish species, some common, some rare and vulnerable. Rare species include the migratory allis shad, twaite shad, sturgeon, the declining Atlantic salmon and the critically endangered European eel. All of these pass through and have the potential to be impacted by the intake for the cooling water to Hinkley C, as they are already for Hinkley B. For the European eel, my specialist area, the Severn Estuary is the migration route for the highest numbers of this fish in the British Isles. The European eel is classified by the IUCN as critically endangered, and its numbers have declined by as much as 90 – 95% over the past 40 years. It needs and indeed deserves all the help it can get to help its recovery.

Hinkley C is the first nuclear build in the UK for many years, and is part of the UK's strategy for low carbon energy generation. However, low carbon energy generation is not necessarily green or environmentally friendly. Notwithstanding the risks of nuclear power, rather like hydropower, huge water pumps and intakes suck in and kill huge numbers of fish. However, because we can't see them, being under water – not many people know or care. If they were birds, say blue tits or even seagulls, or mammals – say dormice or badgers – there would be a public outcry if we could see these pumps sucking in and macerating our wildlife – whether designated under any specific conservation legislation or not. The Environment Agency rightly specified that there should be a first class, state-of the art screen to minimise the impact on any fish species. We have heard that the pumping rate of the intake will be 132 cubic meters per second (cumecs). To put that in perspective, that is over twice the average flow of the River Thames' 60 cumecs, and higher than the average flow of the River Severn's 107 cumecs. But those are average flows – highly skewed by wet weather events. It is greater than the normal dry weather flows of all the rivers that drain into the Bristol channel – the Severn, Parrett, Avon, Wye, Usk and Taff combined. That is massive!

Hinkley C is and will be a 'state-of-the-art' development, investing in the future energy security of the UK. We, as environmental specialists, and on behalf of the citizens of the UK, should expect a state-of-the-art fish screen to match that development, to minimise the impact on any fish species, and particularly those that are rare or vulnerable. If the appeal is to save the appellant money, well the saving is a pittance compared to the total cost of the development. If that small additional cost is ultimately passed on to its customers, then I am positive that the majority of our fellow citizens would be prepared to pay a few extra pence per year, to protect the wildlife of this country.

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