

## Devon and Severn IFCA News

### D&S IFCA Engage in Hinkley Point C Consultation

#### D&S IFCA Submit Response to MMO Consultation on Hinkley Point C

NNB Generation Company (HPC) Limited (NNB GenCo), a subsidiary of EDF, is responsible for the ongoing construction of Hinkley Point C nuclear power station. NNB GenCo plan to use tunnels to abstract very large volumes of water from the Severn Estuary to cool the nuclear reactors at Hinkley Point C, before discharging this water back to the Estuary. The construction of the cooling water infrastructure involves substantial works in the marine environment, including dredging and drilling of the seabed near to Hinkley Point. The MMO granted a Marine Licence for the relevant works in 2013, and the Licence has since been varied several times by NNB GenCo.



NNB GenCo recently submitted another request to the MMO to vary the Marine Licence. This request included updated methods for some of the work, but also included a request to increase the quantity of material to be dredged, and a request to dispose of the dredged material at the Portishead licenced disposal site, which is a few hundred metres from the coastline at Portishead in Somerset. NNB GenCo's variation request was subject to consultation, arranged by the MMO, to which D&S IFCA responded. The full consultation response submitted by D&S IFCA is available to view [here](#). While developing this consultation response, D&S IFCA was able to engage with a range of stakeholders and ensure that their concerns were highlighted through the consultation process.

*Photo: The Severn Estuary at low tide, as seen from Hinkley Point*

In the consultation response, D&S IFCA raised a number of concerns including, but not limited to: (i) impacts of dredging and disposal on the fish assemblage of the Severn Estuary Special Area of Conservation (SAC), (ii) impacts of dredging and disposal on other species and habitats (*Sabellaria* reef and sandbanks) designated under the Severn Estuary SAC, (iii) the Applicant's need to use the best available and most up-to-date evidence, (iv) the potential impacts on other legitimate users of the sea, including angling charter vessels, and (v) the Applicant's need to undertake a more thorough assessment of the cumulative and in-combination effects that the proposed activities could have on the Severn Estuary SAC. D&S IFCA's response also highlighted the Applicant's need to reconsider alternatives to disposing of the dredged material at sea.



Devon and Severn IFCA  
Response to MMO Consultation for  
MLA/2012/00259/6

5<sup>th</sup> April 2021

D&S IFCA's requested (a) that the Applicant provide the additional evidence and assessments taking account of D&S IFCA's comments, and (b) that these documents form the basis of a subsequent round of consultation during which it would be possible, if necessary, for D&S IFCA or Local Authorities to request that the MMO refers the application to Ministers. A referral to Ministers provides the option for the Secretary of State to hold a Public Inquiry regarding the application.

D&S IFCA highlighted to the MMO that, if it is not possible to satisfy both conditions (a) and (b), then D&S IFCA considers the consultation response (dated 5<sup>th</sup> April 2021) to represent a formal request for the MMO to refer this application to Ministers.

The MMO has an established online consultation system for Marine Licence Applications. D&S IFCA monitors Marine Licence Applications for works relevant to the District, and regularly provides responses to relevant consultations. This work is important for ensuring that the interests of inshore fisheries and relevant stakeholders are represented in marine planning, and enabling the sustainable use and management of the marine environment.

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