

Joint Statement from the Chairs of the Parish Councils of Arlingham, Kingston Seymour and Westbury-on-Severn on EDF's proposal not to fit an Acoustic Fish Deterrent at Hinkley Point C nuclear power station.

The initial engagement by EDF proposing to take farmland from within our communities to create saltmarsh has raised concern that the options are harmful, destructive, impractical, disproportionate and result from a flawed process for all concerned.

This paper constitutes an initial joint statement from the Chairs of Arlingham, Kingston Seymour and Westbury on Severn parish councils: -

1. **We call for** independent oversight and scrutiny of the survey work on saltmarsh creation options being commissioned by EDF ensuring that broad and appropriate evaluation criteria are established which draw in appropriate expertise but equally from those within our communities with extensive and detailed local experience and knowledge.
2. **We call for** alternative options to be added to those being assessed for the creation of saltmarsh to include reclamation of an area of land from the estuary (perhaps in a similar way to the creation of the 'New Grounds' which is the site the today's WWT Slimbridge).
3. **We call for** the options under consideration to be widened to include a process of reaching out to all conservation bodies within the Severn Estuary to encourage the development of options for qualitative and quantitative expansion including restoration of peat bogs to expand their activities and contribute to mitigation.
4. **We call for** an independent study and review of the practicality and efficacy of fitting an Acoustic Fish Deterrent (AFD) at Hinkley Point C to include its impact on fish species, how it could be serviced and maintained, diver safety and use/efficacy of Remote Operated Vehicles (ROVs), to reconcile the contradictory views and evidence of EDF and industry experts.
 - a. Should an AFD not be installed it will cause a loss of fish but not loss of habitat. **We call for** the inclusion and assessment of an alternative option to create within the Severn Estuary hatcheries/nurseries for local native fish species to supplement fish stocks to at least the extent of predicted fish loss caused by Hinkley Point C.
 - b. Should an AFD not be installed **we call for** a review as to why it cannot be made possible, through legislative change, if necessary, for the consequent loss of fish at Hinkley Point C to be managed and mitigated via the existing, or an amended, fishing quota process. The risk to fish

from Hinkley Point C represents a miniscule percentage of the UK trawler catch

5. In the community meeting at Kingston Seymour on 14 October EDF stated that it considers the proposed mitigation of saltmarsh creation within our parishes to be disproportionate. Our communities agree. EDF also stated that it has made its views on proportionality known to the Environment Agency/Government and urged us to raise the matter with our MPs. We question whether any UK policymakers would ever have intended that the UK legislation would result in EDF understanding that it is obligated to bring forward the current options. **We call for** a statement from UK Government as to whether or not it considers the current proposals to be both common sense and proportionate.
6. The legislative requirements binding EDF have their origins in EU legislation and after the UK's departure from the EU became assimilated law in the UK through the Retained European Union Law process which rebranded it as UK law in 2023 with seemingly little or no review. We understand that this may include the Conservation of Habitats and Species Regulations as retained EU law. **We call for** a review by the Environment Agency and the UK Government to establish the UK legislative changes that would be necessary to facilitate a mitigation which both EDF and the communities across the Severn Estuary can recognise as both appropriate and proportionate.

Councillor David Merrett, Chair, Arlingham Parish Council

Councillor Mike Sewell, Chair, Kingston Seymour Parish Council

Councillor Simon Phelps, Chair, Westbury-on-Severn Parish Council

22 October 2024