

Wye Salmon Association

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Tidal Lagoon (Swansea Bay) PLC,

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Dear Sirs,

Wye Salmon Association represents over 900 members of the angling community on the River Wye including anglers, gillies and riparian owners. We write expressing our concerns regarding the likely impact of the currently proposed Swansea Bay and subsequent tidal lagoons on migrating fish stocks in Severn Estuary rivers.

As we are sure you are well aware the Severn Estuary is a migratory route for salmon returning to spawn in rivers including the Severn, Wye, Usk, Neath and Taff, along with such endangered species such as eels and lamprey, as well as highly prized sea trout and shad, a species found in few UK rivers outside the Wye.

We believe large numbers of these migrating fish will inevitably be caught in your lagoons, having no choice but to pass through the turbines. Many of these species spend several weeks or months swimming around the estuary before heading upstream to spawn, their progeny returning by the same routes, during which time they would have an unpredictable but significant number of chances of being caught in the lagoons.

Many of the rivers flowing into the Severn Estuary, including in particular the River Wye, are designated as Special Areas of Conservation for amongst others things their fish species. Developers are, we understand, required by law to prove to a very high standard their actions will not damage those fish populations.

A report in October 2010 by the Department for Energy and Climate Change concluded: “*Any tidal power scheme has the potential to significantly disrupt both nursery areas and the passage of fish up the estuary, which for some species may lead to the collapse of the associated fisheries*.”

We ask, have you carried out baseline characterisation surveys and research in respect of salmon and sea trout behaviour in Swansea Bay, such as movements of fish, seasonal changes and distributions, mixing of stocks, causes of and responses to migratory delays, effects of chemical and physical changes, resulting from the lagoon, on such behaviour?

We are very concerned that barrage studies demonstrate significant and damaging delays to river entry, especially in dry summer conditions. If delayed fish are on the wrong side of turbine discharges when a spate occurs, it is possible that they may miss an opportunity to run, missing what might be the only window of opportunity for river entry. If they are delayed by the lagoon operations they may well fall back and re-approach the estuary and likely to encounter the turbines on more than one occasion. We understand none of this has been assessed, beyond apparently comparing fish swimming speeds with lagoon outflow velocities, assuming no-impact avoidance behaviour. We believe an in depth scientific study of fish movements in Swansea Bay is therefore essential. NRW in their response to the draft environmental survey recommended tagging surveys to try to establish migratory routes, including post implementation displacement, in-migration and out-migration behaviour, etc.

We understand tidal lagoons could play a significant part in the UK’s energy mix but there will be environmental consequences and it’s essential that they are properly assessed and understood before any decisions on the sustainable nature of these lagoons are taken.

Our understanding is the impacts of the project remain inadequately determined. We urge you as the developers to provide us with independently-verified evidence proving you have found ways to make your turbines safe and that they will not kill fish. Significant harm to migratory fish stocks in the Severn Estuary and its many rivers would have a huge impact on thousands of anglers, those employed in the sport and affect the asset values of those owning such fisheries. These provide vital contributions to the local economy and jobs in South Wales estimated at £10m and 120 respectively for the river Wye alone.

We further ask that you to provide us with information on how you intend mitigating or offsetting any damaging impacts expected to occur throughout the lifetime of the project.

Stuart Smith

For and on behalf of Wye Salmon Association

cc.

Tidal Lagoon Power Ltd, HQ

Carl Sargeant Welsh Assembly Government [WAG]

Chris Davies MP Brecon & Radnorshire

Bill Wiggins MP North Herefordshire

Jess Norman MP Hereford & South Herefordshire

cfi

Stephen Marsh Smith Wye & Usk Foundation [WUF]

Mike Timmis Wye Salmon Fishery Owners Association [WSFOA]

Mark Lloyd Angling Trust [AT]